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Title:
The battle of compliance over advocacy among street-
level bureaucrats: understanding perceptions and
approaches of financial aid workers in the United
States.

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Master of Arts, SocSci

Submitted in fulfillment of the requirements of the Degree of Doctor of Education (EdD)

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Abstract

My focus in this research is on the experiences of financial aid leaders and frontline staff as Street-level Bureaucrats (SLBs), focusing on whether those staff approach their work primarily from a compliance-focused mindset or if they adopt advocacy-based approaches. A primary goal of this work was to ascertain whether financial aid staffs were more likely to use advocacy-based approaches if they were provided with better information. In particular, better information about the structural challenges within the financial aid system and the supports beyond financial aid that were available to help them better support students.

I utilize an interpretive approach to this work and use multiple theoretical approaches to help understand my data. Foucault's ideas of discipline and panopticism are used to show how financial aid staff operate under constant professional surveillance with the compliance requirements in their jobs. I also utilize Ball's Foucauldian approaches to shed light on the idea that financial aid staff exist under the same weight of compliance requirements as Ball has attached to teachers and performativity. I support these pieces of theory with Lipsky's street-level bureaucrat ideas, bolstered by Zacka's recent work that utilizes the same concepts and adds in the ideal types of SLBs that I use as a methodological tool. Lastly, I use Herd and Moynihan's work on administrative burden to highlight the weight of compliance requirements that financial aid staff labour under.

I have utilized multiple surveys of financial aid staff and leaders to create quantifiable data to generate descriptive statistics and open-ended questions that I analyze using qualitative analysis to strengthen my descriptive data. My findings show that financial aid staff tend to adopt more compliance-based approaches but are willing to consider other operating methods if provided with the information needed to do so. My discussion sections explore how my theoretical lenses and the data intersect to show how and why financial aid staff tend to follow compliance-based approaches in their work. I also examine to what extent there are ways to shift them towards advocacy approaches to provide students with more support than they currently receive. I conclude with how this work contributes to the base of higher education theory, implications for policy and practice and financial aid, and how this work has changed my understanding as a professional in this field.

Table of Contents

Table of Contents	4
Chapter 1. Introduction	12
1.1. Positionality and importance	12
1.2. Use of Theory	13
1.3. Research questions.....	15
1.4. The context of US higher education	16
1.5. Literature Review	17
1.6. Methodology	18
1.7. Findings-Project Leads	19
1.8. Findings-Financial aid staff	19
1.9. Discussion.....	20
Chapter 2. Professional Context.....	22
2.1. Introduction.....	22
2.2. Personal Context	22
2.3. The Larger Project	24
2.3.1. Stage 1	24
2.3.2. Stage 2	25
2.4. The complexity of the U.S. Higher Education System.....	26
2.5. Two-Year Institutions	26
2.6. Four-Year Institutions.....	26
2.7. The complexity of Financial Aid.....	27
2.8. The Free Application for Federal Student Aid	28
2.9. Categories of financial aid	30
2.10. How Financial Aid is Calculated	32
2.11. Systemic Flaws.....	33

2.12.	Cost of Attendance	34
2.13.	Verification	35
2.14.	Financial Aid Staff	37
2.15.	Financial Aid Appeals	38
2.16.	Planning with real costs	40
2.17.	Conclusions and Problem Statement.....	40
Chapter 3.	Literature Review	42
3.1.	Introduction.....	42
3.2.	Literature Review Strategy	42
3.3.	Financial Aid as a Field of Study.....	43
3.4.	Efficiency and Targeting Approaches	44
3.5.	Exploration of systemic flaws and undercounting of Student Financial Need.....	47
3.6.	How Students Experience the system.....	48
3.7.	Gaps in the Research.....	50
Chapter 4.	Theoretical Approach	53
4.1.	Introduction.....	53
4.2.	Foucault and Ball-The disciplining of frontline staff to ensure compliance	54
4.3.	Street-level Bureaucrats.	59
4.4.	Administrative Burden.....	62
4.5.	Plaiting three threads of theory	64
Chapter 5.	Methodology.....	66
5.1.	Project Overview	66
5.2.	Position of This Work Within a Larger Study	67
5.3.	The Importance of Institutional Context.....	67
5.4.	Sample Description.....	68
5.5.	Survey Details-Project Leads.....	70

5.6.	Survey Details-Financial Aid Staff.....	73
5.7.	Analytic Approach.....	75
5.8.	Quantifiable Survey Responses	76
5.9.	The Use of Research Vignettes.....	77
5.10.	The Benefits and Drawbacks of Vignettes.....	78
5.11.	Using Data and Theory to Create the Research Vignettes.....	79
5.12.	Vignette Descriptions.....	81
5.13.	Vignette Types	84
5.13.1.	The Compliance-focused counselor.....	84
5.13.2.	The Indifferent Counselor.....	85
5.13.3.	The Advocate Counselor	86
5.14.	Methodological Limitations	87
Chapter 6.	Findings-Project leads.	89
6.1.	How we worked with project leads to improve understanding of the limitations in the current system.....	90
6.2.	Limitations of the current system	91
6.3.	Changes in Understanding for Project Leads	96
6.4.	Changes in Perception about student need and willingness to change practice.	98
6.5.	Willingness to use better data.	102
6.6.	Using Negative EFC to Direct Supports to Students.....	106
6.7.	Recent policy developments	109
6.8.	Conclusions.....	109
Chapter 7.	Findings-Financial aid Staff	111
7.1.	Framing	111
7.2.	Understanding of limitations within the financial aid system	111
7.3.	Comfort and use of non-tuition supports	121

7.4. Conclusions.....	131
Chapter 8. Discussion.....	132
8.1. Introduction.....	132
8.2. Points for Discussion; Knowledge Matters	133
8.3. Compliance Versus Advocacy Among Financial Aid Staff	134
8.4. Uneven Exercise of Discretion	137
8.5. Terrors of compliance.....	138
8.6. How Differences Between Staff and Leadership Challenge Change Making.....	142
8.6.1. Sharing of information from leaders to staff	142
8.7. Professional Experience matters in how staff approach their work.....	144
8.8. Informational interventions work, to a point	144
8.9. Limitations of this work.....	146
8.10. Further research.....	146
Chapter 9. Conclusions	149
9.1. Answering my research questions	149
9.2. This work in context	150
9.3. Financial aid staff operate within a system that pushes them to focus on compliance 151	
9.4. Summary of findings: Financial Aid staff tend to be compliance-driven.....	151
9.5. Informational interventions work to an extent, and leadership matters.....	152
9.6. Experience and discretion are linked	153
9.7. Implications for Theory and Higher Education	153
9.8. Impacts on My Professional Practice.....	154
9.9. Recommendations.....	155
Chapter 10. Bibliography	156
Chapter 11. Appendices.....	167

11.1.	Appendix A. Project Leads Survey 1. Survey administered to all project leads .	167
11.2.	Appendix B. Financial Aid Staff Survey 1. Administered to all financial aid staff at participating Institutions.	173
11.3.	Appendix C. Project Leads Survey 2. Survey administered to all project leads..	223
11.4.	Appendix D. Financial Aid Staff Survey 2. Administered to all financial aid staff at participating Institutions.	230
11.5.	Appendix E. Project Leads Survey 3. Survey administered to all project leads..	284

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Declaration of Originality

I declare that, except where explicit reference is made to the contribution of others, this dissertation is the result of my own work and has not been submitted for any other degree at the University of Glasgow or any other institution.

Printed Name: Edward Conroy

Signature:

Chapter 1. Introduction

1.1. Positionality and importance

The financial aid system in the United States (U.S.) is, it can be persuasively argued, a deeply flawed and perhaps even broken system, as explored in detail in chapter two, particularly sections 6-18. It is a system that no longer provides the path to higher education access and success that it was initially designed to provide. Efforts abound to adjust or change the system, as surveyed in chapter three; while those work their way through the painfully slow policy process, some things can be done to use the current systems in ways that might improve the support it provides for students. That is the focus of this study. Additionally, I hope to add to the field on issues of professional knowledge and discretion, which are a key part of my work here, improving the understanding of the importance of professional knowledge for higher education staff and the importance of how and when they exercise discretion.

The work represented in this dissertation is a part of a larger project, funded by Lumina Foundation, called The Real Price of College. There are six participating institutions, four community colleges, and two universities, all located in Texas. The project aims to determine whether financial aid offices can use current financial aid data to determine student financial need better, whether students can benefit from more realistic information about the price of college, and to what extent having this information can change the understanding that financial aid staff have of their student's financial need and how they need to be supported, the larger project also considers whether providing financial aid recipients with more detailed information about how their financial need is undercounted is beneficial. The work represented here focuses on the components of this project related to the work we conducted with project leads and financial aid staff from each institution.

I come to this work having been a financial aid administrator working directly with students at two different institutions for six years. This is combined with three years of work on financial aid research, practice, and policy advancement at the Hope Center. This experience gives me a detailed understanding of the challenges faced by financial aid staff when operating as a street-level bureaucrat (SLB) within the U.S. financial aid system and an understanding of the

policy implications and challenges present in trying to change the current system. As with other frontline workers that can be defined as SLBs, financial aid staff wield significant discretion, with the ability to approve or deny appeals for students whose circumstances do not fit neatly into the boxes supplied by the financial aid system. As I show in chapter two, the U.S. financial aid system is also massively complex. Supportive and student-centered financial aid staff can make a huge difference in whether a student completes the application process successfully or not and often helps determine whether students know what financial aid options are best for them to utilize.

By focusing on the experiences and understandings of financial aid staff, I hope to add to the extensive work on the US financial aid system. As we will see in Chapter three, while extensive, the current literature largely focusses on either the policy side, with reference to how and why financial aid policies exist as they do and the extent to which they are well or poorly targeted for achieving the goal of increasing access and attainment in higher education. Alternately, the literature focuses on how different programs impact students' behavior and outcomes. Each of these approaches plays a vital role in the field, but they leave a significant gap in the middle with the experiences of financial aid staff. Financial aid policies are made real through the work of financial aid staff, and student experiences of financial aid are primarily modulated by how policies and regulations are interpreted and implemented by financial aid staff. Thus, there is room for significant development of the literature as it concerns the role of financial aid staff. Answering questions of how financial aid staff go about their work and how it might be improved if they had the knowledge and resources needed hopefully adds to our understanding of how financial aid could be improved to provide students with the support students need to be successful.

1.2. Use of Theory

My theoretical approach to this work is explored in-depth in chapter four. My approach melds Foucauldian ideas of power, freedom, and norms of behavior that the education system imposes upon those working in it with the concept of street-level bureaucrats originally developed by Lipsky (2010). This approach represents a novel joining of theoretical approaches, as little work utilizes Lipsky's work in the education field. This combination of approaches lets me tease out ideas of power conceived at a high theoretical level and whether

those concepts hold true at the front line of implementing a piece of public policy. From the Foucauldian side, I particularly focus on Ball's approaches (Ball, 1990, 2013) in adapting Foucault to the education space. In particular, I focus on how the administrative state uses its power to ingrain a sense of discipline into SLBs, in my case, financial aid staff, that leads them to approach their work from a compliance-first mindset. I suggest that financial aid staff are in the unfortunate position of operating as both guard and prisoner within the bureaucratic maze of the U.S. financial aid system. Financial aid staff must ensure that students comply with the system while also being watched by the Office of Federal Student Aid (FSA). The institutions staff represent are subject to sanctions if they fail to properly enforce regulations, up to and including being barred from participating in federal student aid programs, a likely death sentence for most institutions. I explore the idea that Foucauldian docility is inculcated using regulations that impose penalties for missed compliance issues, but not for failing to support students adequately. The heavy-handed use of regulations leads to a profession that labels itself as “caring” but is torn between caring and advocating for students and ensuring that every box is ticked for the administrative state.

Financial aid staff must take on a dual jailor/prisoner role. They have to sit in Foucault's central observation tower and watch students to ensure that they are complying with federal regulations. At the same time, they are observed themselves to ensure they and their institution are holding students to the rules. While operating as compliance monitors, financial aid staff are designated as part of the support system available to students. This supportive role is often represented in titles that use the words “advisor” and “counselor” as descriptors for these staff roles; titles that suggest caring and support more than they do roles of compliance monitoring. I use the ideal typing approach Zacka (2017a) adopted to help explore these issues, particularly this dissonance between the compliance-focused reality of the work and the ideal of financial aid as a helping profession. I use Lipsky's ideas of SLBs (Lipsky) to help understand the practicalities of the roles that financial aid staff play, as well as to critique the ideas of docility and obeisance to power (Foucault, 1977) that a purely Foucauldian approach to this work might lead to. I also draw on the work that Zacka (2017) has conducted on street-level bureaucrats. Zacka hews closely to Lipsky's general explanations of who and what SLBs are. However, his approach to ideal typing different approaches taken by SLBs provides a key methodological approach to this work that I will explain in greater depth in the methodology chapter.

1.3. Research questions

Three central research questions form my analytical framework for this project, as listed below. These questions are further broken down into smaller sub-parts to address different aspects of the central research hypotheses.

How well do project leads and financial aid staff understand the limitations of the current federal financial aid system?

This first broad question is focused on the idea that many financial aid staff do not interrogate the system they work within. That when operating as SLBs, most workers do not take much time to think through whether the system they are implementing is well-founded or not.

Financial aid staff are generally much too busy just trying to get the work done; as such, their time is spent determining how they approach the day-to-day work that the system brings them and whether their role is to comply with, subvert or enforce that system. If they are provided with the tools to see the significant gaps and flaws within the system, does that change perceptions and a willingness to seek novel solutions for providing support to students?

Within high-level questions, I also seek to understand whether improved information about the shortcomings of federal methodology changes financial aid staff/project lead's opinions about the adequacy of the financial aid system. I ask if providing detailed information about undercounted financial need changes staff/project lead's perceptions about whether their students are adequately supported by financial aid. I also consider to what extent providing staff with better information might help staff target support to those students more effectively.

Do financial aid staff at these institutions see themselves as having the agency to support students outside of tight strictures, and do they have the knowledge to provide that support?

This question speaks to the ideal types that I use as a central part of my methodological approach and seeks to understand why and how financial aid staff fall into a particular type. For instance, asking whether financial aid staff fall into a compliance mindset because that is what they are predisposed to or whether it is a result of where the incentives in the work lie. This question also holds onto ideas of whether culture can be changed from one of compliance as a primary approach to advocacy as a primary approach, and to what extent

culture can be changed from the top down if leaders are willing to share the information that we provide them with about their student's real financial need.

How well do financial aid staff understand student supports that go beyond financial aid?

This final framing question concerns whether financial aid staff are willing and able to think beyond the traditional strictures of the financial aid system when presented with students that require additional support. This question speaks to what level of knowledge and comfort is needed with different supports for staff to suggest them to students and whether financial aid staff are willing to consider providing this kind of advice as part of their job. This question also helps understand whether it is possible to push financial aid staff toward more of an advocacy mindset if we help them see that there are tools and supports that go beyond the traditional financial aid system.

I hypothesize that while many financial aid staff fall into a compliance mindset, that is primarily due to the structure of the work, the incentives, both institutional and individual, and the nature of federal regulations that govern financial aid. I posit that if provided with the right tools and knowledge, financial aid staff are more willing to provide students with support beyond financial aid than we might expect from a heavily compliance-driven industry. Secondly, I use the SLB framing to question the idea that staff are docile and acquiescent in their work. When provided with the bare minimum of support to help them support their students, I suggest that they are likely to want to break out of the traditional strictures of financial aid and become more advocacy-focused in their work.

1.4. The context of US higher education

Chapter two provides a detailed explanation of the context of US higher education and specifically the financial aid system within that context. I lay out the history of why and how the US financial aid system is so complex, how it poses challenges for students and why it has led financial aid work and staff to be heavily focused on compliance aspects of the work rather than student advocacy and support. I pay particular attention to the verification auditing process that many students are run through and how that presents significant challenges for students and institutions. I also give an overview of the general scope of the US higher education system as it currently exists to provide context for how different types of

institutions operate and are constrained. This chapter provides an essential primer on the US higher education system and the financial system and process. I provide an overview of how financial aid functions in practice both for the students and families who experience the system as the means for paying for college and for financial aid staff charged with supporting students and ensuring compliance with myriad federal laws and regulations.

1.5. Literature Review

My literature review in chapter three provides context on the current significant threads of research on and about financial aid in the U.S. I review the system approaches, those focused on student experiences of the system as currently constructed, and the approaches that attempt to re-work the current system to deliver support to students more efficiently. There is limited work on how financial aid staff sit in this system, which provides the opportunity for this work to provide new insight for policy makers and practitioners.

Adding to financial aid staff's knowledge increasingly appears to be a crucial tool in assisting students. Unmet financial need has increased year on year (Baum, Ma, Pender, & Libassi, 2019; Baum, Ma, Pender, & Welch, 2016b, 2017; Baum & Payea, 2013), and students are increasingly placed in financially precarious positions (Allen & Wolniak, 2019; Broton & Goldrick-Rab, 2018; DeAngelo & Franke, 2016; Goldrick-Rab, 2016). This financial precarity has led to significant basic needs challenges for students (Goldrick-Rab, Richardson, & Hernandez, 2017; Goldrick-Rab, Richardson, Schneider, Hernandez, & Cady, 2018). These issues combine to suggest that the financial aid system alone cannot adequately support students, at least not as presently structured. If that is true, we must equip staff with better knowledge of supports beyond financial aid, as we attempt to do in this work.

There has been significant work on the importance of high-quality college counseling and its impact on whether students, particularly first-generation students, and students of color, attend college. Stanton-Salazar and Dornbusch (1995) have conducted survey-based work on how Mexican origin students in Los Angeles schools utilize information networks to understand the college process. De La Rosa's (2006) survey work with high school students in southern California on the importance of financial aid perceptions has shown how vital a proper understanding of the financial aid system can be for low-income students when deciding whether they should attend college. Fitzgerald and Delaney (2002) have shown a greater likelihood of college-going aspiration from low-income students who anticipated

receiving financial aid support to attend. McDonough (2004) has shown how college advising around college prices can increase the likelihood of college enrollment for students from low-income backgrounds. All of this work focuses on how important it is for students to receive good information about financial aid and the role that can play in getting them to apply for college and then succeed once they are there. What is missing is a discussion of how the financial aid staff, who play a key role in providing this kind of information can be encouraged to do this type of work rather than viewing students as objects of enforcement that they must ensure are abiding by financial aid regulations.

1.6. Methodology

Chapter five provides a full exploration of my sample and methodological approach. The data for this project was gathered through multiple surveys of two distinct groups of college staff at six different institutions. One group was composed of senior leaders at each college who acted as project leads. The other group was the financial aid staff at each institution. Surveys were administered in a pre- and post-fashion and asked questions to determine how well respondents understood the current financial aid system. We also asked questions to determine how well equipped they were to explain financial aid to students, whether they understood the systemic flaws, and to what extent they were willing to consider thinking outside of the traditional financial aid box when supporting students. The surveys were combined with in-person interventions delivered at meetings with project leads and informational webinars for project leads and financial aid staff. These interventions aimed to provide the staff and project leads with new skills and information to ascertain what supports might change staff perceptions and approaches to working with students. I use the word intervention here as shorthand for the various pieces of the project aimed at improving knowledge and understanding of project leads and financial aid staff.

I combine quantitative analysis of the surveys to generate descriptive statistics. These results are considered. The quantitative portions of the work are buttressed by analysis of the open-ended survey questions that were coded and used to create three vignettes to generate the ideal types that financial aid staff sort themselves into in their work as SLBs—utilizing two different forms of analysis provided additional context and nuance to the quantitative treatment of the survey data.

1.7. Findings-Project Leads

Chapter six addresses how knowledgeable the project leads were about some of the financial aid system's central flaws and how much their approach and attitudes towards the financial aid system could be changed by providing information and learning. I consider whether project leads are willing and able to increase their understanding of the flaws within the financial aid system and, once cognizant of those flaws to take action that might help increase students' student success by mitigating those flaws. I focus on the base level understanding of financial aid's systemic flaws and whether relatively small informational interventions helped to change the perceptions and understanding of project leads about problems with the current financial aid system. I also seek to understand whether there is a willingness amongst project leads to use financial aid data in nontraditional ways to provide support to students. I pay particular attention to what extent project leads are willing to share information with their financial aid staff that is not part of routine financial aid information. For the project leads who were unwilling or reluctant to share such information, I explore why they might be reluctant to share that information with staff.

This chapter helps explain how work in this area needs to be done at multiple levels if it is to meet with success. For example, trying to improve the understanding of financial aid staff in isolation is unlikely to lead to significant changes in approach as leadership controls much of the information flow to their staff. Alternately, trying only to improve the knowledge of those in leadership positions is unlikely to provide the kind of broad-based changes needed. By working with leaders and staff simultaneously, there is an increased chance that lasting change supported by both staff and leadership can be made.

1.8. Findings-Financial aid staff

Chapter seven examines the understanding that financial aid staff have of the flaws in the financial aid system. I explore how well financial aid staff understand the fundamental formulas that underpin the financial aid process and to what extent they understand how flawed those formulas are. This includes whether staff think they can manually calculate an Expected Family Contribution, which requires a good understanding of the underlying formulas. I also examine the data provided on how financial aid staff explain complicated

financial aid concepts to students to provide indicators of which of the three vignettes they fall into.

My analyses explore to what extent I have been able to change or improve financial aid staff's understanding of how they go about supporting their students. First, questioning how comfortable staff were with student supports beyond traditional financial aid at the start of the project. I then explore whether understanding of supports beyond financial aid has been improved by the simple interventions we provided. I then address whether increased awareness of supports leads to increased willingness to refer students to those supports. Finally, I also explore whether there is a correlation between length of service and an understanding of the flaws within the financial aid system and a willingness to consider supports that go beyond financial aid to support students.

1.9. Discussion

In chapter eight, I explore the interactions of my findings and theoretical approach. This chapter pulls together the threads of the three different theoretical approaches I have woven together and determines to what extent the data and findings match with my theoretical hypothesis and approach. I draw on my data and the broader literature base to explore and support these conclusions.

I break my discussion into several sections. I first cover the central idea that financial aid staff are more compliance-focused than advocacy-focused. I then re-introduce the idea that they exist as both jailer and prisoner within financial aid regulations, with extensive potential capacity to exercise discretion but with a limited actual capacity to do so. Next, I discuss key information from my two findings chapters, particularly the reality that level of knowledge matters a great deal, with increasing knowledge seeming to increase a willingness to operate on a more advocacy-focused basis. I then assess whether financial aid staff are more compliance-focused than advocacy-focused. This includes exploring some of the possible drivers of compliance rooted work behaviors and to what extent this matches or disproves the theoretical base I use, particularly Foucauldian ideas of docility. Finally, I also connect the debate around the use or avoidance of discretion and how financial aid staff are willing or unwilling to utilize discretion.

My next section explores the idea that financial aid staff are driven to compliance-focused behavior partly due to the performative expectations they operate under. I explore how Department of Education rules and regulations make it more or less likely that staff will be willing to utilize discretion. I also note the reality that there is a significant middle ground of staff who are relatively indifferent and take neither a compliance drive nor advocacy-driven approach to their work. I move on to assess to what extent project leads differed from financial aid staff and how information sharing from leadership to staff levels might impact the approach that staff takes, particularly with regard to exercising discretion. I explore to what extent years of professional experience play a role in how financial aid staff approach their work and whether years of service are positively or negatively correlated with more advocacy-based approaches to their work. Lastly, I present a short section on possible avenues for further research and how it could contribute to financial aid practice and policy.

Chapter 2. Professional Context

2.1. Introduction

This introductory chapter provides an overview of my professional context related to my work in financial aid offices in my two prior positions, and now my work engaged in research on financial aid issues in my current role working at the Hope Center for College, Community, and Justice¹. I provide an overview of the Higher Education landscape and financial aid system in the United States (US). This provides a foundational understanding of the complexity involved with applying for financial aid in the US and sets the context for the importance of working with financial aid staff to improve the system they operate in. I also provide an overview of the larger project that this dissertation is a product of. This work is based on the staff facing side of a project with two different research arms, one student-facing and the other staff-facing. An overview of the whole project helps in understanding the staff facing piece of the work.

2.2. Personal Context

Before joining the Hope Center for College, Community, and Justice, I worked in financial aid at two different institutions. Starting as a financial aid counselor at Vanguard University, a small liberal arts college, I moved to The University of California Los Angeles (UCLA). Initially, at UCLA, I worked as an outreach coordinator, conducting on and off-campus workshops for students, high school counselors, and families on how the financial aid system worked in general and at UCLA in particular. By the time I left UCLA, I managed all communications and outreach for the financial aid office. My work included managing communications to current and prospective students around financial aid, helping ensure that as many students as possible completed the financial aid process through effective communications, and taking on all large public speaking engagements for the financial aid office. At its core, my role involved breaking down an immensely complex financial aid system into easily digestible presentations, emails, web pages, and publications. This work

¹ The Hope Center for College, Community, and Justice is a nonprofit action research center focused on rethinking and restructuring higher education and social policies, practices, and resources to create opportunities for all students to complete college degrees. More information on the center can be found here: <https://hope4college.com/about-the-hope-center/>

provided me with a first-hand view of how profoundly challenging and often broken the American financial aid system is.

The never-ending challenge of translating this complex system for the students and families I worked with made it increasingly clear that financial aid has significant challenges in how it operates. Financial aid systems and processes are overly focused on compliance, and there are underlying methodological flaws in the formulas used to calculate aid eligibility. These flaws need to be addressed if the financial aid system is going to function successfully. All these issues are to the significant detriment of achieving the core goal of any higher education financial aid system; providing students with the financial assistance and guidance they need to afford college.

Financial aid staff generally spend most of their time focused on the pieces of the system they need to check off the correct regulatory box. This focus is primarily the fault of a system designed for an idealized college student that no longer exists. That idealized (and increasingly fictional) student is 18-22, went straight from high school to college, just left home, has a supportive nuclear family to help them financially, and lives on campus in their first couple of years of college. That idealized student now represents the minority of students in American higher education. The majority of students have one or more characteristics that make them so-called “nontraditional” students (National Center for Education Statistics, 2015). The majority of students are financially independent, many have dependents of their own that they support (Reichlin Cruse, Holtzman, Gault, Croom, & Polk, 2019), and large numbers are providing financial support to their families rather than being supported by them (Goldrick-Rab, 2016; Scott, Zhang, & Koball, 2015). Our financial aid system has not kept up with these changes in reality. It was never designed to support such a diverse group of students, and, as enrollment of such students has grown, financial aid support relative to costs has dwindled (Mitchell, Leachman, & Masterson, 2016; Protopslatis & Parrott, 2017; Walizer, 2018). There is even some new evidence that there are direct links between cuts to higher education funding and racial resentment (Taylor, Cantwell, Watts, & Wood, 2020).

The financial aid system plays a prominent role in the challenges faced by students; however, financial aid staff can have both negative and positive impacts on students’ experience of the system. Financial aid staff are often inculcated into the idea that the system is remarkably rigid and that they have little power to operate independently to support students. The reality

is that financial aid administrators have a significant amount of bureaucratic freedom but often choose, or are pushed, to exercise that freedom in very limited ways. Allowing the system to dictate behavior over and beyond what regulation calls for, where overzealous adherence to regulation inhibits the work of supporting students. I have seen this at both institutions I have worked at in financial aid; adherence to over documentation taking precedent over easing student's bureaucratic burdens. This is supported by the percentage of time financial aid offices spend on compliance functions.

In many cases, compliance-focused work represents the most significant fraction of staff time and resource allocation. This is evident in research on the administrative burden experienced by financial aid offices conducted by the National Association of Student Financial Aid Professionals (NASFAA) (2015; National Association of Student Financial Aid Professionals, 2020). Focusing on compliance requirements is in many ways a natural street-level bureaucratic response to too much work (Lipsky, 2010), too few resources, and negative incentives, where staff are much more likely to get in trouble for negative audit findings than they are for not providing sufficient support to students.

2.3. The Larger Project

This dissertation draws on data from a more extensive study called *The Real Price of College*, funded by Lumina Foundation. This brief overview of the larger project provides context for the portion of the work my dissertation focuses on. The project is being conducted with six institutions, all in Texas. Four of the institutional participants are community colleges, the rough equivalent of further education colleges in the United Kingdom (UK). Two others are bachelor's degree-granting institutions. The project has two stages, with multiple research approaches at each stage. In addition, each institution participating has two project leads participating and allowed access to their financial aid staff for survey work.

2.3.1. Stage 1

The first part of the project focused on project leads from each institution, who have senior leadership roles in student affairs and financial aid, and the financial aid staff from each college. The goal was to help these staff at both a senior and front-line level understand some

of the underlying problems with the financial aid system to show them where students are poorly served and how the system does not accurately calculate things like financial need. The overarching goal is to work alongside financial aid staff and senior leaders to help reveal some of the ways the financial aid system is broken. We also sought to encourage these staff to consider whether there are ways that they can work within currently available financial aid to improve support to students while still living inside of the regulatory system as it currently stands. This work has been done by providing concrete examples of the methodological flaws within the system, including gathering administrative data from all the participating colleges and calculating a negative EFC for all students who applied for financial aid. This has helped us show that EFC calculations are seriously undercounting the true extent of financial need for most students. In the methodology chapter, I provide more detail on all the work completed with project leads and financial aid staff.

2.3.2. Stage 2

The second stage of this project focuses on interventions to help students understand that the official estimates of cost and financial need provided by financial aid offices may not represent their whole financial reality. We hypothesize that students and their families currently use financial aid EFC and COA to plan for college expenses and are then surprised when those estimates do not seem to match their financial reality. Helping students understand that official estimates are likely over estimating what they can afford to pay and what their costs are, and as a result, underestimating how much aid they should receive to cover those costs may help students better plan for college expenses. This second stage of the project was conducted as six focus groups with current students, using a pre and post-intervention survey design with a presentation and short video we specifically created to help improve student understanding of college costs and the realities of flaws in the financial aid system.

The second stage of the project provides valuable context in which to set this dissertation. However, this work focuses on the changes in understanding and knowledge for project leads and financial aid staff. Thus, there are some limited references to the student-facing portion of the project but no in-depth analysis of that arm of the project.

2.4. The complexity of the U.S. Higher Education System

There are over forty-three hundred degree-granting institutions of higher education in the United States (U.S. Department of Education National Center for Education Statistics, 2019). At a high level, they are divided between public colleges and universities, private, not-for-profit colleges and universities, and private for-profit colleges and universities. Those categories are further broken down into two and four-year colleges. Two-year colleges generally award associate's degrees, while four-year colleges award bachelor's degrees through Masters and Doctoral degrees. This high-level typology disguises the massive variation in the type of institutions in these two categories, mainly in funding.

2.5. Two-Year Institutions

Most two-year colleges are public institutions (U.S. Department of Education National Center for Education Statistics, 2019), receiving some of their funding from state and local funding sources and charging relatively low tuition levels. There are then several hundred private two-year colleges split between private, not-for-profit institutions and private for-profit institutions. While private institutions, both not-for-profit and for-profit, do not receive any direct public funding, they do receive substantial amounts of indirect public funding through the financial aid system. This is because financial aid from the state and federal level in the U.S. is essentially vouchered, with funding following the student wherever they choose to enroll.

Two-year institutions offer shorter, more vocational programs that lead to credentials in skilled trades and longer courses in subjects considered more traditionally more academic, offering students the opportunity to earn an associate's degree in a particular subject. Two-year institutions also provide students with the opportunity to transfer to a four-year institution and complete the rest of a bachelor's degree in two more years of study.

2.6. Four-Year Institutions

Four-year institutions can be split in the same fashion as two years in terms of funding sources, but there is significantly more diversity in size, scope, and financial strength. Along with considerable variations in how much they charge students. Private, not-for-profit institutions range from Harvard through small private liberal arts colleges with tiny enrollments and Historically Black Colleges and Universities; there is vast diversity amongst

private, not-for-profit institutions. With this comes vast diversity in how much financial aid students receive. Wealthier institutions can provide far more institutionally funded financial aid than those with smaller endowments. Only a tiny fraction of institutions have endowments that run into the billions. Private, for-profit institutions represent a different category, with corporate owners and more money spent on advertising than instruction. Institutions like the University of Phoenix are the most famous of these.

Public four-year institutions are also very varied from flagships like the University of California Los Angeles, University of North Carolina Chapel Hill, and Michigan University, with highly selective admissions, and multibillion-dollar endowments, to institutions like Alabama State University and Portland State University, with open admission standards and endowments in the tens of millions of dollars. Public universities also charge different tuition levels to students enrolling from within their state than out-of-state students. Using higher tuition from out-of-state students to help balance their budgets is primarily due to the massive decline in state appropriations for higher education since 2008 (Laderman, 2017).

There are additional layers and levels of complexity in the U.S. higher education system, with more granular levels and types of institutions. However, that level of detail is not required here; instead, this section serves as a primer to help provide context around the overall complexity of higher education in general and financial aid specifically.

2.7. The complexity of Financial Aid

The financial aid system in the United States is tri-partite, with financial aid coming from three different potential sources: the federal government, state governments, and individual institutions. Federal aid is available to all citizens and legal permanent residents, with a few very limited exceptions that make aid available for students who do not meet those criteria. State aid is generally only available to students who are residents of that state and attending an in-state institution. Some states limit eligibility for state financial aid to citizens and permanent residents, while others provide aid to undocumented students and citizen and permanent resident students. Institutional aid is provided directly by colleges and universities. Similar caveats apply to eligibility for citizens, permanent residents, and undocumented students with institutional aid as they do for state aid. There are differing award schemes for

each type of financial aid based on academic merit, financial need, or a combination of both criteria.

Financial aid in the United States (US) is immensely complicated. The complexity is theoretically grounded in the ideal of targeting aid to the students who need it most. That complexity is often unnecessary for targeting, however. Dynarski and Scott-Clayton, along with others, have shown that most of the targeting in the current system could be achieved with a much simpler system (S. M. Dynarski & Scott-Clayton, 2006; S. M. Dynarski & Scott-Clayton, 2008; Lieber, 2017). Their work has shown that 75% of the questions used in the aid application could be removed without significantly changing the accuracy of targeting the aid to the students and families with the greatest financial need. Financial aid complexity creates significant challenges for students, their families, and administrators and advocates, as we all attempt to navigate a system seemingly designed to frustrate rather than facilitate access to higher education.

2.8. The Free Application for Federal Student Aid

At the core of the US, financial aid system is the Free Application for Federal Student Aid (FAFSA), an electronic form of over 100 questions² that ostensibly operates as a tool designed to determine students' relative ability to pay for college. FAFSA is used by the Federal Department of Education (ED), state-based aid programs, and individual institutions to determine the allocation of need-based financial aid. The reality is that FAFSA operates as a rationing tool more than anything else. The original intent may have been that FAFSA would determine a reasonable amount a family or student could be expected to pay for their college costs. That intent has long faded. FAFSA now mainly functions as a Pell Grant (the primary federal grant) indexing tool for federal aid and as a rationing tool for most other forms of financial aid.

When applying for financial aid, students begin by completing their FAFSA, which requires detailed tax, income, and asset information for themselves if they meet the criteria to be considered an independent student³. If they do not meet the criteria for independent status,

² From 2023 onwards this form will be reduced in length from over 100 questions to 38 questions. These changes are being made in an attempt to simplify the application process for students and families.

³ FAFSA places students within two broad categories; Dependent students, who must provide parent income and tax information, and independent students, who only need to provide their own income information. To be

they must also provide income, tax, and asset information for their parents and themselves. There are three different levels of questions students are required to answer depending on whether they meet the criteria for the auto-zero Expected Family Contribution (EFC) calculation, the simplified needs test, or have to be run through the complete FAFSA formula (Federal Student Aid, 2017). To receive an auto-zero EFC, students, or their parents for dependent students, must have income below \$26,000 and receive public benefits or be eligible to file a simplified tax return. To be run through the simplified needs test, which excludes assets from the EFC calculations, the student or family must have income below \$50,000 and receive public benefits or be eligible to file a simplified tax return. Additionally, FAFSA asks whether the student has ever been convicted of a drug-related crime and asks men to register for Selective Service⁴. Once this information has been entered, it is run through a formula defined in the authorizing legislation rather than through regulation (U.S. Department of Education, 2019b). This means changes to the formula can only be implemented through legislation, not regulation, making improvements challenging to enact. The student then receives their EFC. This number is theoretically the amount that the student, and/or their family can afford to contribute to their educational costs. As already mentioned, the reality is that EFC is a very inaccurate measure of students and family's ability to pay for college costs.

This whole application process is completed using financial information over two years old (U.S. Department of Education, 2019a) at the time of applying for financial aid, and almost three years old by the time the student enrolls in college. For example, if I applied for financial aid for the 2020-2021 academic year, I would have applied between October 2019 and March 2020, using my tax information filed in the spring of 2019, reflecting the income I earned throughout 2018. Using such old income information requires a system of appeals for students whose financial circumstances have changed since their applications were processed. For example, if the student loses a job and becomes unemployed after the end of the tax year used on their FAFSA, then their financial information is inaccurate when they apply for aid. The only way to correct this situation is to appeal to the student's financial aid office. This

considered independent for financial aid purposes, a student must be over 24, have children or other dependents they provide more than fifty percent of the financial support for, be a veteran or currently serving in the armed forces, former foster youth, and homeless or at risk of homelessness.

⁴ Selective Service is the system that registers American males between 18-26 years of age for the draft should one ever be instituted again.

becomes particularly challenging for students applying for admission to multiple institutions. There is no central process for appeals, so a student may have to complete multiple appeals, using different forms and dealing with differing institutional appeal policies, before knowing how much financial aid they might receive from each institution they are considering.

Completing the FAFSA gives the student minimal indication of how much they will receive in financial aid. After completing their FAFSA, the only thing the student will know is whether they are eligible for a Pell Grant and how much they can take out in federal student loans. They do not know whether they will qualify for state-based financial aid, institutional aid, or a work-study award. This leads to significant frustration as students try to determine how much college might cost them and decide which colleges and universities they can afford to attend. Even if students knew at this stage how much aid they were going to receive, there is enormous variation in cost of attendance (COA) -which influences aid eligibility- between different types of institutions. At many institutions, institutional and state aid exceeds federal aid, so most students have to wait until they are admitted and receive financial aid offers from each institution before they know the price they will pay.

2.9. Categories of financial aid

There are three broad categories of financial aid. Grant aid, merit aid, and self-help aid. I outline each type below. College Board (2021) and Federal Student Aid (2021) provide useful overviews of financial aid categories and processes for further detail. Love and Campbell (2017) also have an excellent report detailing the financial aid process and programs.

Grant aid, typically based on financial need, does not need to be repaid, and can come from the federal government, states, and institutions. The largest federal grant program is the Pell Grant, originally intended to provide most or all funding needed for a student to pay tuition and fees at a public institution (National Association of Student Financial Aid Administrators, 2011). Many states also have their own grant programs, mainly provided to students who attend in-state institutions. State grant programs vary significantly in the amount of support they provide, with the most generous paying full tuition and fees for in-state students at public institutions, for example, the CalGrant program in California. However, most state programs are less generous and cover only a portion of total tuition and fees.

Merit aid awarded based on academic ability or other merit, such as athletic or musical talents, tends to be awarded by individual institutions. Awards are generally based on Grade Point Average (GPA) from high school and standardized test scores, two primary considerations for admission decisions at most US institutions. This is the category that most scholarships fall under, often given regardless of the student's financial need. Some state aid programs, including the Calgrant program, use a combination of merit and financial need criteria to award funds (California Student Aid Commission, 2019). Typically these programs require a minimum high school GPA in addition to an income cut-off.

Self-help aid. Much as the name implies, it is financial aid where the student is deemed “helping themselves” either by borrowing or working. The two main self-help aid programs are federal work-study and federal student loans. Work-study provides subsidies for hiring students and does not count the earnings from that program against students when they file their financial aid application in the following year. Federal student loans come in several different forms. The most common federal loans are subsidized direct loans, unsubsidized direct loans, and Parent PLUS loans. Subsidized and unsubsidized loans are taken out by the student. The primary difference between the two loan types is when interest begins to accrue on the loan. Subsidized loans accrue no interest while the student is enrolled at least half-time. Interest begins to accrue after graduation or when the student drop below half-time enrollment. Because of this, they are considered a need-based award. Students are only eligible for subsidized loans if they have unmet need (see Table 1). Unsubsidized loans begin to accrue interest as soon as they are disbursed to the student. All students enrolled at least half-time or more are eligible to take out direct loans. Students can borrow up to their cost of attendance minus any other aid they are receiving, or up to the maximum loan amounts available, whichever cap comes first. There are no credit requirements involved. Parents borrow parent PLUS loans as a way of meeting costs within their student’s cost of attendance that are not met by other financial aid. A credit check is required, but the credit standard is deliberately designed to be easy to meet.

2.10. How Financial Aid is Calculated

Three different elements are used to calculate students' financial aid eligibility: EFC, cost of attendance (COA), and calculated need. In the US, COA is defined by federal regulation (Department of Education, 1965) and includes total tuition and fees, an estimated amount for room and meals, books and supplies, transportation, personal expenses, and health insurance costs. There are also provisions to include an allowance for dependent care costs and costs related to a disability. However, the student must specifically request those last two categories, usually through an appeal process. A student's financial aid package is determined mainly by what their calculated need is. Calculated need is the difference between a college's COA and the student's EFC, as I explain below in table 1. Students can only receive gift aid (any aid that need not be repaid, such as grants and scholarships) up to their calculated financial need. They can receive non-need-based aid (typically loans) up to their institution's total cost of attendance.

Table 1 illustrates how EFC and COA interact to determine a student has calculated financial need. COA plays a significant role in determining a student's calculated need and their maximum award amounts. COA varies widely by institution. Private institutions tend to have much higher COAs than their public counterparts, with some of the most expensive private colleges sporting COAs over \$75,000 per year⁵. It is important to note that most students do not receive need-based aid equal to their calculated need, as demonstrated by multiple researchers (Baum et al., 2019; Siegel Bernard, 2019; Walizer, 2018). Federal and state funds rarely meet full calculated need, and most institutions in the US do not have the institutional resources to make up the difference. 78% of full-time students at public four-year institutions have unmet financial need, with an average unmet need of \$14,400 as shown by the College Board's regular reports on trends in student aid (Baum et al., 2019; Baum et al., 2017).

⁵ Admittedly such institutions also tend to be the wealthiest, providing significant need-based aid to students from low-income backgrounds.

Table 1. How Expected Family Contribution and Cost of Attendance Determine Student Financial need.

$$\text{COA minus EFC} = \text{Calculated Financial Need}$$

Student EFC	Cost of Attendance	Calculated Need	Max Need-Based Aid	Max Total Aid
\$0	\$30,000	\$30,000	\$30,000	\$30,000
\$5,000	\$30,000	\$25,000	\$25,000	\$30,000
\$25,000	\$60,000	\$35,000	\$35,000	\$60,000
\$55,000	\$60,000	\$5,000	\$5,000	\$60,000
\$65,000	\$60,000	\$0	\$0	\$60,000

2.11. Systemic Flaws

The current financial aid system has serious underlying methodological flaws built into several aspects of the calculations that underpin the system. These flaws exist in the Federal Methodology (FM) that provides the basis for the calculations that determine a student's EFC and how colleges calculate their COA. FM has several significant flaws, but the largest stems from the Income Protection Allowance (IPA) (U.S. Department of Education, 2019b). In theory, this is an amount of money that is protected from the EFC calculations to provide a family or individual student with a "moderate standard of living" (Collins, 2016; U.S. Department of Education, 2019b) before calculating how much they can contribute to their college costs. Unfortunately, this allowance relies on very out-of-date assumptions about family spending and costs of living. For example, for the 2019-2020 academic year, the IPA for a family of four was \$28,580 (U.S. Department of Education, 2019b, p. 18). After that amount, every \$100 increase in income will increase the EFC for the student by \$27-47 on a progressive scale, with the 47% rate kicking in at adjusted available income of \$32,201 (Collins, 2016). To put this into context, one of the colleges participating in the project my data is drawn from is Amarillo, Texas. Amarillo is considered one of the least expensive cities

to live in the USA (McDowell, 2019), with rent 80% lower than the national average. The amount a family needs for a moderate standard of living in Amarillo is \$68,828 (Economic Policy Institute, 2020), meaning that the current FAFSA formulas leave families in one of the lowest cost cities in the US, over \$43,000 short of a moderate living standard before calculating what they can afford for college.

The IPA formula is so outdated that it assumes families spend more of their income on food (30% of the IPA) than they do on housing (22% of the IPA) (U.S. Department of Education, 2019b). Given that housing is the single largest budget item for most families (U.S. Bureau of Labor Statistics, 2019), this provides just one example of how badly out of date some of the underlying assumptions and formulas within the financial aid system are. Most student's EFCs significantly overestimate student's and families' ability to pay for college expenses (Goldrick-Rab, 2016; Kelchen, 2017; Siegel Bernard, 2019) while simultaneously underestimating how much aid they should receive.

2.12. Cost of Attendance

Cost of Attendance (COA) calculations are the second part of the financial aid formulas that leave students and their families with poor information and often less aid than they need. Federal regulations require that colleges and universities include standard elements in their COA estimates. However, they do not provide guidance on how institutions should construct their estimates, what constitutes an appropriate methodology, nor which data sources they should use. This leaves financial aid administrators to figure out how to estimate costs for costs that are quite difficult to estimate. Creating COA estimates for students living on campus is generally the least complicated process. Institutions already know what they charge in tuition and fees; they can average room and meal expenses based on meal plan and residence hall costs, and then often survey students to get some idea of how much they spend on books each semester. This process becomes significantly more challenging when calculating costs for students living off-campus or at home with their families.

To calculate off-campus living expenses, financial aid administrators often resort to surveying students, using local rent estimating websites, or even surveying local landlords with no guidance on what data sources to use. For students living at home, determinations must be

made over whether students are likely to be paying any rent to live at home and whether living at home decreases their other living costs or not. It is easy to see how these varying methods can produce varying and often inaccurate results. COA was also designed for the idealized student I mentioned earlier, which no longer represents most students, who live much more complex lives, with children, spouses, and other financial responsibilities that are not generally considered. COA estimates are widely variable, even when established by colleges near each other. Kelchen, Goldrick-Rab, and Hosch (2017) have shown that almost half of colleges have COA estimates 20% above or below the estimated county-level living costs.

2.13. Verification

In addition to the complicated means-testing and challenging application process, applying for financial aid is only the first hurdle in the financial aid process. After applying for aid, many students have to submit additional documentation before they can be awarded financial aid at their college or university. Until recently, approximately one in three students who applied for financial aid went through an audit process known as verification (Federal Student Aid, 2017). That percentage has been declining, standing at 18% based on the most recent information released by the Department of Education (Hoover, 2020). However, that is still incredibly high. Research has shown that aid eligibility changes very little for most students selected for verification, with around 75% of students verified seeing no changes to their EFC (AlQaisi, DeBaun, & Warick, 2020; Warick, 2018). To put this into context, the Inland Revenue Service (IRS) audits approximately 1% of all tax filing records while losing between \$450-\$560 billion to fraud every year (Gale & Krupkin, 2019). Compared to \$1.4 billion in “improper payments” through financial aid programs (U.S. Department of Education Office of Inspector General, 2019). It is worth noting that many improper payments are due to error rather than deliberate fraud, and an improper payment includes incidences where a student received too little in grant funds as well as too much.

Verification is a federally mandated process that colleges and universities must enforce to participate in the Title IV aid system. Students and their families are required to provide the colleges they applied to with tax documents, earning statements, asset information and family size information, and a verification form specific to the institution. When I first began working in financial aid, there was even a process where families whose income looked too

low to live on would have to prove how they managed to pay their expenses—essentially requiring families to prove their poverty. The process is completely decentralized, so if a student is deciding between multiple admissions offers, they may be submitting verification documents to multiple institutions simultaneously.

Financial aid offers are provisional until a student has completed the verification process, so choosing to enroll without knowing what a financial aid package might look like can be financially challenging for many students. There is also some evidence that many institutions require students and families to submit more documents than required by federal regulation (Warrick, 2018), making an already onerous process even more challenging.

Institutions can select additional students for verification beyond those selected by the FAFSA Central Processing Service (CPS). This practice was actively encouraged at the first institution I worked at. It was not actively encouraged at my second institution, but individual counselors were given the discretion to select additional students for verification. Some institutions select all financial aid applicants for verification regardless of whether CPS selects them. There is significant evidence that all these barriers impede the most vulnerable students from enrolling and continuing in college (Bidwell, 2018; Debaun, 2018; Warick, 2018), as is true of so many bureaucratic burdens created by means-testing. The system is often harming the very students it was ostensibly designed to help. This assertion is supported by looking at who gets selected for verification. Verification selection rates are much higher for students from the lowest-income families than they are for students from wealthier families (Ahlman, Cochrane, & Thompson, 2016; Warick, 2018). Students selected are also much more likely to come from racial or ethnic minorities (Douglas-Gabriel & Harden, 2021).

Once students have submitted all required documents, financial aid administrators then compare FAFSA information to the documentation provided by families to check whether the FAFSA information is accurate. This highly manual process presents a significant burden for families and for overstretched financial aid offices (Bidwell, 2018; Campbell & Yuen, 2018), with some research showing that financial aid offices spend up to 50% of their staff time on verification (Ahlman et al., 2016; National Association of Student Financial Aid Administrators, 2015; National Association of Student Financial Aid Professionals, 2020). In addition, some estimates show that as many as half of the students from low-income backgrounds who start the financial aid process never complete it as a result of what is known

as verification melt (Debaun, 2018), where students start the financial aid application process but then never complete verification and receive financial aid. Verification presents a challenge for all students, but a huge one for students who attend open-access institutions, mostly community colleges, where students are much less likely to file their FAFSA early. These institutions also generally have smaller financial aid staffs to process verification. Students cannot receive financial aid until their files have been verified, which can lead to delays in enrollment, financial challenges for students, as well as dropouts and stop-outs (Bidwell, 2018; Warick, 2018).

In addition to needing to be experts in financial aid regulations, verification requires that financial aid staff be relatively expert in significant parts of tax law and regulations. As a financial aid counselor, I had to know whether students and their parents had used the correct tax filing status, whether they might have qualified to use the 1040ez form⁶ even if they had filed a regular 1040, and whether they had correctly entered untaxed income into their FAFSA. I had to match deductions taken, understand the nuances of different types of taxable and non-taxable income and know whether someone had earned over the tax filing threshold if they reported income but had not filed a tax return. This is a significant amount of complex information that financial aid staff must master to process verification files correctly. Financial aid offices spend significant time and effort helping their staff gain knowledge on tax issues. Verification turns financial aid staff into mini-IRS auditors by requiring them to police whether students and families complete their tax returns correctly. This work takes time away from supporting students, helping them understand their aid packages, and ensuring that students understand what they are taking on by taking out student loans.

2.14. Financial Aid Staff

Financial aid tends to center itself as a caring profession, with front-line staff frequently having job titles that include “counselor” in the title. This idea of a caring profession exists in

⁶ Most people who earn income from employee wages, have limited nonretirement investments, and earn less than \$100,000 per year can file their taxes using this simplified form. However, tax preparation companies charge less for a 1040ez than for a regular 1040 form. This leads to many people receiving 1040s even though they could have filed using a 1040ez. Since filing a 1040ez can qualify a financial aid application for the simplified needs test, financial aid staff need to know whether they could have filed using the ez form, even if they filed with the longer more complex 1040.

significant tension with the very compliance-oriented nature of financial aid work. It also exists in tension, as do so many counseling type jobs, with the overwhelming caseload. My former institution, The University of California Los Angeles (UCLA), is, by most standards, very well resourced when it comes to financial aid staff. The institution has over 31,000 undergraduate students and almost 13,000 graduate students (National Center for Education Statistics, 2020a). Approximately two-thirds of those students receive financial aid of some sort. UCLA has 11 financial aid counselors, plus four front-desk advisors to handle walk-in questions, for a counselor-to-student ratio of roughly 1-1900 and a total financial aid staff of 55. This is what staffing looks like for a very well-staffed office. Very few institutions have the level of resources that UCLA has. Based on NASFAA’s research, the average staff size for institutions with more than 20,000 students is 31 total staff (National Association of Student Financial Aid Professionals, 2020, p. 9). That number has remained the same over the past five years, even as the number of financial aid recipients has risen (National Association of Student Financial Aid Professionals, 2020).

Nationally the number of aid applications, aid recipients, and amount of aid managed has been steadily increasing over the past decade (Radwin et al., 2018). Simultaneously financial aid operating budgets have declined slightly when adjusted for inflation (National Association of Student Financial Aid Administrators, 2015; National Association of Student Financial Aid Professionals, 2020). Any survey report conducted by an advocacy association for a particular profession should naturally be taken with a grain of salt, but self-reported administrative burden combined with objective increase in the number of students receiving and relying on financial aid do seem to indicate an ever-increasing workload for financial aid offices. Even if the profession is truly one aimed at caring and advice, there is no possible way to provide individual advice to that many students, certainly not while ensuring compliance with the many and myriad financial aid regulations that financial aid offices are charged with enforcing.

2.15. Financial Aid Appeals

As with any type of “street-level bureaucracy” (Lipsky, 2010), there has to be some level of flexibility to deal with situations that do not fall within neat parameters. There will always be exceptions, need for flexibility, and students who need additional help for various

circumstances outside their control. The financial aid system has this built-in through professional judgement (PJ) (Federal Student Aid, 2017). There are five categories of PJ appeal that a student or family can request. The appeal categories range from a special circumstance appeal to look at more recent financial information in the event of job losses, financial challenges as the result of illness, and so forth, all the way to students requesting that their dependency status be changed because they no longer have contact with their parents, often as the result of abandonment or abuse. Subsumed under these broad categories are thousands of individual situations that students experience that do not fit into neat bow-wrapped boxes of bureaucracy. I have sat and walked students through appeals who have just lost their surviving parent to cancer, figured out how to make sure the student with a child has the funds they need to cover childcare costs, and comforted the distraught student whose parent lost their job and can no longer afford to pay their tuition.

The problem with the financial aid appeals process is that it relies on the vagaries of individual decisions made by thousands of financial aid staff around the country. Students have no recourse of appeal beyond the financial aid offices of their institutions (Federal Student Aid, 2017), and overworked staff struggle to take the time over appeals that they need for a thorough assessment. Even when staff wants to grant appeals, the guidelines set out by ED (Federal Student Aid, 2017) and their institutions mean that students often have to jump through multiple hoops. They must explain personal and painful circumstances to complete strangers and do all of this under the immense pressure of knowing that they may be completely unable to pay for their tuition that semester if things do not go their way. Lastly and saddest, the appeals system has no recourse for the student who is under 24 whose parents refuse to provide their financial aid information for the student to submit a FAFSA. Students whose parents refuse to provide information do not have grounds for appeal under PJ regulations (Federal Student Aid, 2017). This hole in the regulations creates situations where students must choose between keeping in contact with their parents and having a better chance at receiving financial aid.

2.16. Planning with real costs

A key aspect of this work comes down to helping students and their families properly plan for and understand their college expenses. As I have shown above, between flawed EFC calculations and COAs that often bear little resemblance to reality, students are often working with very poor information when they try to determine how much they will pay for college. So how do we correct that? One of the first places we can start is by helping the staff who work on the front lines of financial aid understand the flaws in the system and then working with them to see where there are areas that they can work within the confines of the system as it is to provide better support and information to students. Essentially, I am interested in how easy or difficult it might be to inculcate cultural change through relatively low-cost interventions with financial aid staff. The key to this is working with financial aid staff to show them where the challenges lie and not viewing them as the problem. This kind of work must be collaborative and trust-building to face any chance of success. If we can help staff understand the flaws in the current system, then we can give them the tools to help show students what their costs really look like. Helping illuminate the realities of the current systemic flaws can also play a role in policy creation and improvement.

2.17. Conclusions and Problem Statement

This introductory section has laid out the complexities and challenges of the current financial aid system in the US, providing the foundational understanding for the rest of the dissertation. The essential facts are that the current system is serving no one well, least of all students. They need more help in terms of actual dollars and much more help in understanding the system they must operate in. That sort of help is only possible if we can change how the frontline staff think about financial aid and get them to see that the system currently has some huge flaws that need to be addressed in the long term. I believe that many staff already believe this but are unsure where or how to start the cultural change process needed to help generate long-term change.

In the short term, I hope to help start a conversation and some action around the idea that there is room to operate within the current system without kowtowing to it. This will include encouraging staff to support students in new ways and give students better information to

make decisions with. There is already work in the field to show this can be done by innovative use of the current data (Conroy, Goldrick-Rab, Kelchen, Welton, & Huelsman, 2021; Kelchen, 2020). In the long term, I hope that this sort of work can show where improvement to the system is possible, even with current funding structures, and help jump-start the policy conversation around ways that the system can be improved. This work also contributes to central issues in broader higher education debates, particularly around student access to higher education and support once they have gained entry. Hopefully adding to the work that already exists, for examples of current work see (Allen & Wolniak, 2019; Eichelberger, Mattioli, & Foxhaven, 2017; Fitzgerald & Delaney, 2002; Perna, 2006; Tierney & Venegas, 2009; United States Government Accountability Office, 2018). As well as the ways the higher education professionals, particularly staff and offices, such as financial aid that are largely unstudied, have on the experience and support students receive. These issues of professionalization and discretion are integral to how staff view themselves and their work and, as a result, are central to how students experience their institutions. I discuss this in greater depth during my discussion in chapter eight. Finding ways to improve our understanding of these types of work will hopefully lead to improved insight into how to best train and support these staff, with improvements in student support as a result.

Chapter 3. Literature Review

3.1. Introduction

This chapter provides a detailed overview of how the current financial aid literature plays into my research here. I provide an overview of my literature review search process and how I decided to delineate the different types of research around financial aid. Additionally, I provide a high-level view of the current state of financial aid research generally. I explore the main approaches taken in the current literature and show where there are gaps, with reference to the gap around how financial aid staff play a vital role within the financial aid system. I break the current literature into the three broad categories explained below. I describe the overall focus of research in each of these three areas and explore the strengths and weaknesses that exist in each broad area. I also show where the research gaps exist and how my work here helps fill in a small piece of those gaps.

In the theory portion of this chapter, I briefly explain the three theoretical approaches I utilize. I also lay out how I understand each theory, an explanation of how they help frame my research, and how I use it to help explicate my findings. I finish by explaining how I plait the three different threads of theory together and how that supports the rest of the work here.

3.2. Literature Review Strategy

My literature review strategy contained two distinct approaches. The first approach was to gather the work of the researchers who are widely known for their work on financial aid issues and use their papers on the topic as a starting point. Researchers like Susan Dynarski, Eric Bettinger, Judith Scott-Clayton, Robert Kelchen, Sara Goldrick-Rab, Laura Perna, and Sandy Baum formed the foundations of my search. I used their work and the work they cite to establish the boundaries of my initial literature search. Once I had explored the bibliographies of the published work of those researchers, I added a keyword-based approach, using a series of Boolean searches across multiple academic databases focused on areas like “financial aid,” “financial staff,” ”FAFSA,” and “financial aid complexity.” Reading as I went, I drew from the bibliographies of each paper to further expand my literature search. Once I began to find the same papers and authors cited in each new piece of literature, I determined that I had reached saturation point and focused on the literature that was most apt to my work here.

I have grouped the literature into three broad areas. This breakdown is based on the three strands of work that repeatedly appeared when reviewing the present literature. As I alluded to above, most of the current research on financial aid is primarily concerned with these three particular areas of focus. As such, it made sense to organize my review by the same broad themes.

1. Systems-level approaches that focus on how the system is funded, whether the way those funds are distributed is the most efficient use of those funds to improve college access and persistence. These types of work have been largely the realm of economists.
2. Approaches that show the challenges and flaws inherent in the current system and potential ways to improve it. These approaches are mainly technocratic, working with how to best implement or adjust the system already in place.
3. How students experience the system and the challenges they have in accessing funds, working through appeals, and ensuring they continue to meet the financial aid criteria that are key to their continued receipt of the money needed to pay for college.

3.3. Financial Aid as a Field of Study

We do not have much understanding of how financial aid staff go about their work, whether they see themselves as student advocates or in a more technocratic role, and to what extent they work for or against a compliance-driven financial aid system. I add to the extant literature by exploring the experiences and work of the staff that sit at the intersection of policy and student experience and make the system work at the very front end of things. This exploration of the current literature on financial aid provides a scan of the different approaches to this type of work, how the field has gone about approaching financial aid research, and where the gaps lie in considering the reality of how high-level policies are experienced and implemented by those who sit face to face with students every day. Given my contention that the financial aid system is insufficient to properly support students, part of this investigation is to determine whether providing financial aid staff with knowledge about supports beyond financial aid might be an effective approach for supporting students.

There have been numerous studies on how students can be better supported with more effective financial aid information (De La Rosa, 2006; Hallett, 2008; McKinney & Roberts, 2012; Perna, 2006) and application assistance (E. P. Bettinger, Long, Oreopoulos, &

Sanbonmatsu, 2012), but nothing that provides financial aid staff with tools outside the traditional financial aid system to support their students. The vast majority of the work on financial aid focuses on either the system and how changes to the system can improve efficiency; for an overview, see (Terry Long, 2008). Other areas of focus are how particular financial aid programs impact students (for example see (E. Bettinger, 2015)); or it is on the experience of students and their families as they navigate the financial aid system (for example, see (Davidson, 2015)). The financial aid staff, those who administer the system and support students as they navigate it, play quite a small role in much of the research on financial aid, with significant room to explore how their role shapes the support students receive.

3.4. Efficiency and Targeting Approaches

Dynarsky and Scott-Clayton have conducted a significant body of research exploring how effective the current financial aid system is at correctly allocating funds to the students that most need them to enroll in college; they particularly focus on unneeded complexity in the aid system, as well the use of tax credits as a financial aid resource. Their work seeks to explore whether aid can be targeted while reducing complexity for applicants and whether tax credits are an effective way to target money to students who need it most. (S. M. Dynarski & Scott-Clayton, 2007; S. M. Dynarski & Scott-Clayton, 2006; S. M. Dynarski & Scott-Clayton, 2008). These studies use existing financial aid data to simulate to what extent removing different variables would impact student eligibility for financial aid and to determine which portions of Free Application for Federal Student AID (FAFSA) do most of the work in determining the aid that students receive. They find that complexity could be significantly reduced without sacrificing much in the way of targeting. They also find that tax incentive approaches to financial aid (S. Dynarski & Scott-Clayton, 2016, 2018; S. Dynarski & Scott Clayont, 2016) are largely ineffective as a tool to increase access and enrollment in college. They suggest we would see a greater benefit from using those moneys to boost regular financial aid; given the focus of this work, that raises the question of whether sending more money through the current system is the most effective way to go about supporting students and supporting financial aid staff.

The National Association of Student Financial Aid Professionals recently commissioned a series of ten papers discussing various approaches to enhance FAFSA efficiency. These papers take several different approaches. Miller (2020) discusses the possibility of students completing a one-time FAFSA rather than completing the application each year. He models what effects would be student aid eligibility and discusses to what extent this might improve students' access to financial aid. Mishory, Walsh, and Granville (2020) provide an overview of whether moving to a free college model, where tuition is free at the point of use, would improve the current means-tested model that the system operates under. Walizer and Lower-Basch (2020) consider how better use of public benefits questions could simplify students' financial aid application process by directing them to a much simpler application if they or their family had used public benefits recently. This approach suggests it would encourage completion of the FAFSA by directing students with the greatest financial need through a greatly simplified process. This would likely benefit those students but still leaves in place the challenge of starting the FAFSA in the first place and leaves verification as a hurdle to be overcome.

Oster, Wiederspan, and DesJardins (2020) take on the challenge of verification and the barriers it presents, especially for low-income students. Using a logistic regression approach, they assess which students are most likely to be selected for verification and to what extent that impacts the likelihood that a student selected for verification will enroll in college, finding that verification appears to depress enrollment. They rightly point out that most students see little or no change in their financial aid after the verification process has been completed. Making it hard to justify such a burdensome process that seems to limit enrollment. This paper draws on the work in the same series by Alqqaisi, Debaun, and Warick (2020), utilizing Pell Grant disbursement data before and after students complete verification to determine whether grant amounts change post verification. They show that verification does not change Pell Grant eligibility for most students and represents a significant burden on students and institutions for minimal benefit in terms of taxpayer money saved.

Kelchen (2020) builds on prior work on negative EFC (Kelchen, 2017) to show that the way the current Federal Expected Family Contribution Methodology is structured fails to capture full student financial need by truncating negative values at zero. Kelchen utilizes full FAFSA data to show that for many students, especially students who already have a zero EFC, there is much more variation than might be evident from the large group of students who have a zero

EFC. Kelchen suggests that recognizing negative EFC might help target aid to the students who have the greatest financial need in a way that cannot be fully captured by using a simple zero EFC.

Baum (2020) provides an exploration of the different policy proposals that have been floated for FAFSA simplification and what the effects of different changes might be, including an increase in FAFSA filers and the likelihood that simplification would not change aid eligibility for students from lower-income households, but might make it harder to determine eligibility for need-based aid for students from higher-income households. Reuben, Huffer, and Baum (2020) then explore to what extent could tax return data be used to replace FAFSA, removing the burden of filing a FAFSA altogether. The findings are similar to those of Baum (2020) in the same series. Baum finds that for lower-income students and families, this adjustment would present limited challenges and likely not change eligibility for aid in any significant way, but that for families with higher incomes and more assets, it would be more challenging to completely replace the FAFSA. This does of course come from a point of view that such complex means testing is necessary, which is highly debatable, with evidence that similar targeting can be achieved with far less information (S. M. Dynarski & Scott-Clayton, 2007). Alternatively, a universal free college model (Perna, Leigh, & Carroll, 2017) might reduce or eliminate the need for means-testing. Lastly, Baum (2020) explores to what extent the current Federal Methodology is a good measure of how much families can contribute to college expenses and how it could be improved. Baum argues that the methodology is highly flawed for determining Pell grant eligibility and that the process for that ought to be simplified, but that for families with more significant financial resources, there needs to be an approach that helps determine ability to pay with some level of nuance. This approach fails to address the fact that college has become unaffordable for all but the top income quintile (Huelsman, 2018; Poutre, Rorison, & Voight, 2017).

There is significant value in exploring how complexity can be reduced in the current aid system, given that complexity inevitably increases administrative burden for students and financial aid staff. There are also benefits to exploring whether tax policy is an effective way of incentivizing college attendance. However, these approaches assume that means testing is a necessary part of aid policy rather than considering universal approaches to college funding. The work also only looks at the complexity experienced by applicants and does not consider any of the compliance issues faced by staff at the other end of financial aid applications.

Admittedly, reducing the complexity of the inputs from students would likely reduce the complexity of the outputs that financial aid staff then have to manage when they process student aid applications.

3.5. Exploration of systemic flaws and undercounting of Student Financial Need

There has been consistent research for the past decade around student financial need and especially unmet need by the College Board⁷ with indications that every year the unmet financial need of students is increasing (Baum et al., 2019; Baum et al., 2016b, 2017; Baum & Payea, 2013). This work shows the ever-growing size of the problem, suggesting that finding ways to improve the ability of financial aid staff to support students who will almost inevitably have unmet need is vital.⁸ This work all deals with official calculations, which undercount the real need that most students have. These approaches mostly use the National Post-Secondary Student Aid Survey (NPSAS)⁹ and descriptive quantitative approaches to assess to what extent student financial need is or is not being met in the current system. Until this year, the methodology of these reports was somewhat flawed due to excluding several key elements from their calculations of cost of attendance (COA). However, that has been corrected in their most recent report, and even with their flaws, these reports, authored for the College Board, play a vital role in the field when it comes to assessing things like student financial need. Kelchen (2017) has conducted some of the first work in determining how we can go beyond the official need calculations to gain a more nuanced understanding of real student need by looking at negative EFC. Kelchen's (2020) most recent work on this subject shows that the number of students with a negative EFC increases over time, making use of this information ever more vital. This work has been conducted by taking administrative data records from individual institutions and then recalculating student EFCs to determine how many students might have negatives if the methodology allowed for them. Kelchen's work

⁷ College Board plays a very significant role in US higher education. It administers the SAT, used as one of the standardized tests for college entrance in the US. It also commissions annual research on student financial aid with its Trends in Student Aid series that I refer to here.

⁸ A detailed explanation of financial need is provided in [Chapter 2](#).

⁹ The NPSAS survey is conducted by the National Center for Education Statistics every 3-4 years. The survey is nationally representative, and focuses on how students and families pay for higher education costs. The survey data is supplemented by student interviews and administrative data provided by institutions.

has raised vital questions around whether we properly account for student need with current EFC calculations. It's one potential drawback is sample sizes that are small relative to the scope of the number of students who use federal student aid. Kelchen's work on these issues is in addition to that conducted by Goldrick-Rab, Kelchen, and Hosch (2017) on the challenges that colleges face in setting COA, which is a crucial part of the financial need calculations. The goal with my work here is to extend what was done in determining how accurately or inaccurately student need is being counted and determining to what extent financial aid staff behavior can be influenced by exposure to these issues and ideas, as well as determining whether there is an appetite for them to use these data, and possibly make these calculations themselves, and using that information to better support students.

3.6. How Students Experience the system

The financial aid system is meant to help students pay for college, so if they do not understand the process or cannot access the funds they are meant to have at their disposal, the system is not effective. A key area of financial aid research is centered on how students experience the financial aid system and how to help them navigate the process. Some of the leading work in this area has been done by Bettinger, Long, Oreopoulos, and Sanbonmatus (2012), who used an experimental design to demonstrate that even small amounts of assistance completing financial aid applications led to significant increases in college enrollment and financial aid receipt. Other work of a similar vein focusses on the role that financial aid staff play as expert guides to students and families, particularly the survey of financial aid staff by McKinney and Roberts (2012). There is also a growing body of research examining if low-cost, high-volume nudging campaigns through texts sent to students can increase completion rates for FAFSA. While smaller efforts using experimental designs have shown some promise (Castleman & Page, 2016; L. C. Page, Castleman, & Meyer, 2020), once scaled up to assist larger numbers of students, positive effects have so far failed to materialize (Bird et al., 2019; L. Page, Sacerdote, Goldrick-Rab, & Castleman, 2019). These studies have used experimental and quasi-experimental designs to ascertain whether nudging students can improve FAFSA application rates and eventual college enrollment. The current lack of impacts at scale suggests significant limits to how much of this work can be done in a light touch, low-cost manner. Bird et al (2019) suggest that scaling nudging campaigns up from local to national may dilute their salience to the students targeted, reducing their efficacy.

The current lack of positive effects from nudging studies conducted at a large scale gives more weight to the idea that there is a need to focus on the experience and knowledge of financial aid staff, who are frequently called upon to assist students with things like FAFSA completion, generally with limited time and resources. Both these streams of research are valuable in understanding what supports students need to successfully navigate the current financial aid system. They also provide insights into where the application process could and should be simplified, given that significant assistance is required for students to navigate the application process successfully. However, this research shows the limitations of nudging interventions. It suggests that complex financial aid application information needs to be provided by overburdened financial aid staff, who are unlikely to devote more time to assisting students with the financial aid application process than they already do.

Goldrick-Rab's (2016) work has explored how students' experience of the financial aid system leaves them with little understanding of how and why the system operates as it does and frequently without the resources they need to meet their basic needs, never mind be successful in college. This research uses a longitudinal experimental design based around the receipt of additional grant funds. This work threads together the complexities of the financial aid system, the challenges presented by lack of funding at all levels of US higher education, the challenges present for staff in administering such a system, and the difficulties it creates for students. This work has shifted thinking in the field to explore basic needs insecurity as a symptom of a dysfunctional financial aid system. However, there is limited exploration of how that dysfunction impacts or is caused by financial aid staff.

There is substantial recent work that suggests many students are confused by the financial aid process and unsure how to navigate it effectively. The work on verification and its challenges has shown that it frequently discourages students from completing the aid process (Davidson, 2015; Debaun, 2018; Warick, 2018). The FAFSA itself is more complex than the notoriously complex US tax filing process (S. M. Dynarski & Scott-Clayton, 2006; S. M. Dynarski & Scott-Clayton, 2008; Lieber, 2017) with limited evidence for that level of complexity. Work on the complexity of award letters by (Burd et al., 2018) has shown that most students are confused by the process and lack the help they need to complete the application. There is also evidence that students do not get enough support from their financial aid offices in navigating the process (Rosenbaum, Deilk-Amen, & Person, 2009). This suggests a crucial need for

understanding how financial aid staff can support students more effectively, both with financial aid resources and supports beyond financial aid.

3.7. Gaps in the Research

This literature search process helped confirm my initial thinking that there is limited work on the experiences of financial aid staff within the system being studied. Given the significant amount of discretion that financial aid staff have in their decision-making and the appeal process, this is surprising. The literature presently focuses on the role financial aid staff play as technocratic agents, system implementers rather than influencers. Current literature pays minimal attention to the considerable amount of official discretion financial aid staff have through the professional judgement process. Additionally, there is limited work on whether financial aid staff attitudes and behaviors can help or hinder students as they navigate the financial aid system.

Financial aid as a topic has both a deep and broad body of literature, ranging from attempting to create the most efficient use of resources to encourage uptake of higher education to how students and their families experience the financial aid system. This work focuses on whether financial aid staff can benefit from an improved understanding of their student's real financial need. The experiences of financial aid staff are relatively lightly studied. There is research around how financial aid offices times is consumed by compliance-focused work (National Association of Financial Aid Administrators, 2020a; National Association of Student Financial Aid Administrators, 2015), as well as myriad regulations they have to implement (Byrne Kornrum, 2006; Chen & DesJardins, 2010; Frankle Cichrane et al., 2007; Warick, 2018). The existing literature that focuses on financial aid staff makes particular note of the need for more research on these staff. McKinney and Roberts (2012) conducted one of the first and only studies on how financial aid counselors view their work and how effective financial aid advising is vital to student's understanding of the system. It is this area where I intend to contribute to the field.

There is the start of a deeper research strand on the experiences of financial aid staff in some contexts. Most of it stems from dissertation work, suggesting emerging interest in this area from early career researchers. There is also a focus on what financial aid staff can do

differently (Davidson, 2015; Frankle Cichrane et al., 2007) and how they should improve the process. This type of work proposes policy and practice improvements, such as improved communications (Hallett, 2008), more clear, less jargon-laden language, and better award letters (Burd et al., 2018), and improved accessibility to financial aid offices for students. I have written guidance like this; it is valid and well-intentioned. However, it often fails to recognize that the incentive structure in financial aid work is primarily centered on ensuring compliance comes first. Pushing for a more student-centered approach without changing those structures is very challenging. It is also worth noting that the work in this area is atheoretical or light on theoretical underpinning in many cases. I hope my work here adds some additional theoretical footings to these areas of research.

There is some work on the role of financial aid staff in helping students access their financial aid, particularly in a community college setting. McKinney and Roberts (2012) used survey work to explore the importance of financial aid counselors in helping students access and understand financial aid. However, they place significant emphasis on the idea that financial aid counselor's primary responsibility is to “help students make informed decisions about financial aid” (McKinney & Roberts, 2012, p. 764). This misses the reality that job descriptions aside, many financial aid staff are implicitly or explicitly encouraged to focus on ensuring compliance as a priority, ahead of advising students.

Financial aid staff are the primary implementers of financial aid policy. It is the work of financial aid staff that students and families experience most often when they interact with the financial aid system. Complex concepts are not explained by a policy staffer from the Department of Education; they are explained by people like me, Frontline staff, who do their best to interpret complex rules and regulations. As both Lipsky (2010) and Zacka (Zacka, 2017) have pointed to in their work, citizens experience policy when they interact with street-level bureaucrats (SLBs). They do not interact with it on a theoretical level. If that is true, as I agree it is, then failing to study and understand how frontline staff approach their work in financial aid likely means we are missing a great deal of understanding of how the financial aid system operates. We can spend all the time we want on optimizing financial aid efficiency at a macro policy level, Big P policy if you will, but failing to understand how those macro policies are implemented and explained means we are missing a large piece of the financial aid policy picture. It is this gap that I hope to begin to bring some light to. By gaining a better understanding of how financial aid staff operate and what their motivations are. As well as in

considering what sorts of information might change how financial aid staff think about the system they work in and how they can improve how students experience it.

Chapter 4. Theoretical Approach

4.1. Introduction

Financial aid as a system, a process, and a community of professionals is threaded through with norms of behavior that are the culmination of legislation, regulation, socialization, and the individual meaning-making that financial aid staff go through as they attempt to do their job, as they attempt to support students. This finding is drawn from personal experience with years of front-line work in financial aid, combined with extensive reading of the myriad financial aid regulations and seeing how those regulations impact the day-to-day work of financial aid staff. This is evidenced by the significant amount of time that financial aid offices spend on compliance-related work that flows from regulatory requirements (Collins, 2016; Frankle Cichrane et al., 2007; National Association of Financial Aid Administrators, 2020a; National Association of Student Financial Aid Administrators, 2015; Warrick, 2018). Through interviews and surveys of financial aid staff spanning multiple projects, I have also found that there are deeply embedded norms of behavior within financial aid, which often ensure that compliance-based behavior is given preeminence in the work of financial aid staff and in office culture. While anecdotal, it is noteworthy that it was considered a promotion to be a compliance officer compared to a student counselor at the last institution I worked at. This was in spite of the fact that the two roles were on the same salary scale. Breaking or challenging those norms of compliance first is difficult and potentially harmful to the careers of financial aid staff. There is a sense within the profession that no one gets fired for poor service and support delivered to students, but that they do if they receive a bad audit finding or poor program review¹⁰ from the Department of Education. This is perhaps understandable. The worst thing that happens if you fail to provide good and effective support to a student is that they may leave the institution. The worst thing that could happen if you mess up your compliance work badly is the entire institution losing the ability to access federal student aid, typically a death sentence for an institution. For example, the closure of Corinthian Colleges after losing access to federal financial aid for its students (Mandaro, 2015)

¹⁰ Details of the program review process are available here: <https://studentaid.gov/data-center/school/program-reviews>

To best understand my research here, I have taken an interpretative approach to the work, trying to understand the how and why of how these different pieces fit into each other, and with an understanding that I have inextricable biases as a former practitioner in the very same roles, my survey respondents hold. My work here seeks to make sense of the understandings that financial aid staff work with. I come to this as both an insider and an outsider. As a former financial aid staff member turned researcher, who has an intimate knowledge of what the day-to-day work looks like while having been on the outside of the day to day work for long enough to see the challenges of the system and ways of working that harm both students and the staff who spend their work lives trying to assist those students.

4.2. Foucault and Ball-The disciplining of frontline staff to ensure compliance

My theoretical starting point stems from Foucault and the idea that much of the regulation and compliance-based approaches taken in U.S. Financial Aid can be traced to his theories around discipline, particularly the suggestion that “discipline produces subjected and practiced bodies, ‘docile’ bodies.” (Foucault, 1977, p. 138). Foucault’s concept of docile bodies explores the idea that bodies must be ready and receptive to have power applied or used over or on them. Foucault’s work focused extensively on ideas of power and knowledge, as well as how discipline is used to inculcate compliance throughout society. Discipline in this context is taken to mean one facet of how power can be exercised and used to elicit particular behaviours and outcomes from those it is exercised over. It is this work that I draw lines from to how financial aid staff operate as executors of financial aid compliance. I use the idea of discipline to explore and explicate how and why the U.S. financial aid system is so highly focused on compliance issues and how that impacts both staff and students. I also critique the idea that discipline only creates docile bodies. The “discipline” created by the heavy compliance requirements and the resulting administrative burden imposed on students and financial aid staff creates both docility and some defiance, rather than only creating docile bodies amongst financial aid staff.

The central idea of Foucault’s (1977) panopticon is that by creating a central observation point, surrounded by cells, prisoners are always on view, without ever knowing if they are

being surveilled. The original concept, adapted from Bentham is focused on prisoners in a carceral environment, but is meant to provide the foundation for other explanations of social control. Foucault argues that this approach creates an environment where it is always possible that you are being observed, without knowing if that is true or not. Ultimately, this has the effect of ensuring that those observed internalize the surveillance and change their behavior pre-emptively because they think they might be under surveillance, rather than because they know that to be true. I use the idea of the panopticon to help explain how the financial aid staff feel as though their decisions and work are under constant surveillance from the Department of Education because of the annual audit process all financial aid offices go through. In a large financial aid office, much as in a large physical panopticon, there is a very small chance that any individual financial aid administrator's work will be pulled for review, but the possibility that it could be pulled creates a sense of ever-present surveillance.

I use Ball (2013), his work on Foucault, and ideas of power to update and extend Foucault's work. Ball approaches Foucault as a way of looking at how we "focus upon and produce modern educational bodies" (Ball, 1990, p. 117), arguing that many of the practices used in education place a more significant burden on the most vulnerable students. I take this approach and apply it directly to the financial aid system. A system that was designed to make being anything other than the administrative norm painful and challenging. Students are not the primary focus of this work but understanding how the decisions of financial aid staff affect them is key to understanding how great of an impact staff taking compliance rather than advocacy focus to their work can have on students. The students who do not fit the neat little boxes that the financial aid system provides for them have to perform their challenges, to perform that which they lack in order to get the seal of approval from a financial aid administrator who will tell them it is ok that their situation is different.

Students exist within the financial aid system with limited power and constrained choices, subject to a system that makes differences from an idealized norm painful to negotiate. The system also penalizes financial aid staff who attempt to find ways to assist students, giving them some small measure of power to understand the system. Those acts tend to lead to more work, as processing an appeal or helping a student navigate the system more effectively is more laborious than doing the minimum. Financial aid staff sit at the tension point of having significant power and knowledge over the process that students must go through. They must also contend with limited power over the legislation and regulations that constrain their daily

work. I explore the idea that the financial system resembles an education “apparatus of security” (Ball, 2013, p. 46) that functions to constrain and penalize both guards and inmates for stepping out of line or attempting to bend the system in any meaningful way. Part of the goal with this work is to explore the tension that financial aid staff experience as a result of being placed in a duality of power and powerlessness; to determine how financial aid staff can be encouraged to give up more knowledge to their students and exercise what power they have in support of those students.

Ball’s discussion of testing and how it is used to simultaneously highlight and obscure individuality (Ball, 2013, p. 72) is directly transferrable to the way that we use the Free Application for Federal Financial Aid (FAFSA) in the US financial aid system as a state-level bureaucratic tool. This form that sits at the center of the system is allegedly designed to delineate between those who need financial aid and those who do not; FAFSA is meant to determine the support individual students need. As with most bureaucratic forms, it creates allegedly individualized profiles while obfuscating many of the characteristics that create that individual profile of a student. This approach to financial aid also creates a system that ‘converge[s] upon the Black body, the disabled body and the “underclass” body in both dramatic and mundane ways’ (Ball, 2013, p. 117). The system creates one where students who fit the ideal and largely fictional idea of a college student can progress through the system with minimal pain, while those who do not or cannot conform have to contort themselves to make their way through.

I use Ball and his work on Foucault to generate the idea of a financial aid panopticon. Financial aid staff do not need a physical tower to observe students locked up in cells around them. Instead, they are privy to all the student’s financial information, ensuring they “deserve” the funds awarded to them. Students are constantly observed and monitored to ensure they are playing by the financial aid rules, to ensure they are meeting all the criteria needed and not attempting to cheat the system, and where if they break or misunderstand a rule, the punishment is the loss of the means (money) to complete their education. At the same time, financial aid staff are both jailer and prisoner. They are told to watch students to ensure that they follow all of our established regulations. Financial aid staff and offices are simultaneously monitored by the office of Student Federal Aid to ensure that they are not missing any of the rules and regulations. Ball deals with a different population of SLBs,

teachers, in his work on “The Terrors of performativity” (Ball, 2003), but the ideas translate quite well.

Performativity in the way Ball addresses it is another form of compliance-focused behavior. Ball (2003, p. 216) talks about performativity as “judgements, comparisons and displays as means of incentive, control, attrition and change – based on rewards and sanctions”.

Performativity in this context is the need for the worker in question to explicitly show they are complying with the standards they are told they must meet to be considered excellent or good. It is not about meeting a standard because doing so would show competence, rather meeting the standard is the marker of competence. For financial aid staff this comes into play by needing to show they are meeting every tiny piece of the federal regulations that govern their work, and even going further to enact their own internal policies and procedures that are more stringent than even federal regulations require.

Ball suggests that teachers are mostly at the mercy of the system they do not control. While that is true in some cases for financial aid staff, given the large amounts of discretion available at both an institutional and individual staff level, I suggest that in some cases, financial aid staff are advocates for a compliance focus over student advocacy; financial aid staff can be complicit in the compliance regime. Often this presents itself in the name of ensuring support goes to the students who most need it or that there is a duty to protect taxpayer funds. All the while, students struggle to figure out what they are supposed to do.

There is a fundamental power-knowledge relationship here between staff and students (Ball, 2013, p. Loc 788), with staff holding most of both. If staff hold that power close and fail to use it to help students navigate the system, then the compliance focus has overtaken advocacy, something I explore in my discussion chapter. If ‘it is not possible for power to be exercised without knowledge, it is impossible for knowledge not to engender power’ (Foucault, 1980, p. 52), sharing knowledge with students would help to share that power. The goal is to determine whether staff can be encouraged to give over some of that power and knowledge and operate more as advocates and less as compliance monitors. I use this concept to observe how financial aid staff respond to this constant monitoring of a panopticon within a panopticon, determining whether they attempt to buck or use the system as best they can by operating as advocates or whether they bow to the pressure from above and turn into

compliance-focused operatives. This higher-level theory is largely operationalized by considering the ideas of street-level bureaucracy.

Foucault and Ball both provide useful theoretical perspectives to analyze and explore the work of financial aid staff. There are areas that they are open to critiques though. Hughes (2015, p. 84) has rightly critiqued the idea of the ‘fleshless passive body’ that comes out of Foucault’s work. This criticism can be extended to Ball, whose work around performativity often implies that those subject to performative demands on their work have no agency in complying with the performative demands placed on them. This issue is accidentally highlighted by Holloway and Brass (2018) in a paper that is largely laudatory of Ball’s prescience in identifying the terrors of performativity and how it has changed teacher’s approaches to their work reducing autonomy and increasing measurement of objective performance. Holloway and Brass suggest that it is unequivocally a negative to see how teacher’s attitudes have changed toward performance requirements. However, they fail to engage with the implications that their research subjects have stated that they find comfort in the performance standards they are held to. This critique ultimately comes down to how much agency we endow SLBs with and to what extent performativity requirements can be welcomed to simplify the complex demands of SLB jobs. Wang (2011, p. 154) provides a helpful summation of this by suggesting that Ball does not give enough credit to the idea of ‘powerful subjects’ in Foucault’s work. Ball diminishes the ability of those subject to performative requirements to vessels subject to input only, rather than both input and potentially resistant output. I explore this critique in my discussion regarding how much of a role financial aid staff have in bringing performative requirements on themselves and to what extent they can act as powerful subjects.

Lastly, Hope (2003, 2009) provides both support and nuanced critique of Foucauldian approaches. Hope’s work highlights that the visual aspect of the panopticon should not be overemphasized and supports the idea that the compliance effect of constantly being monitored is no longer about a literal visual gaze. Instead, the panopticon can often now be thought of as an electronic visual gaze, something financial aid staff are often subject to as their work is examined for meeting compliance requirements. Hope’s work on surveillance (Hope, 2005) also makes it clear that resistance from at least some subjects of surveillance is almost a certainty, something Foucault explicitly pointed to in some of his writing on power and knowledge (Foucault, 1982). Given the finding that school children are able and likely to

resist compliance requirements, it is reasonable to suggest that financial aid staff, with significant professional autonomy as SLBs are even more likely to push at the compliance regime they work within, or that if they do not, they are actively choosing not to resist as tacit agreement, rather than doing so through pure docility.

4.3. Street-level Bureaucrats.

Every interaction that a financial aid staff member has with a student or family is a microcosm of the power/knowledge relationship I have explored in brief above as the second strand of my theoretical approach. Staff sit in a place of knowledge, able to use their power by doling out discretion as they or their institution chooses to. How financial aid staff give their knowledge and exercise their power ultimately comes down to exercising discretion. Lipsky's Street-Level Bureaucrats (2010) (SLBs) is central to my work here in that financial aid staff are perfect examples of SLBs. Lipsky's key holding is that SLBs face working conditions that lead to managing their work differently from the impersonal and detached decision-making that bureaucratic ideals would suggest is best for delivering government services and supports. Central to these ideas is the reality that SLBs face more work than they have time to complete, deal mainly with complex systems and processes; they have to manage the expectations of complex humans in the form of their clients and are charged with significant autonomy and discretion to make decisions with minimal direct oversight from superiors. SLBs are also charged with dealing with issues that wider society would perhaps ignore. I explored how financial aid staff fit all these characteristics in detail in my prior chapter on the context of US higher education.

I use Lipsky (2010) to sort through and understand the individual actions of financial aid staff when it comes to the daily grind of processing financial aid applications and helping students and families understand the system they are seeking support from. Understanding how staff make these day-to-day decisions is a vital part of understanding the work here, as students rarely experience the big P policy that has gone into creating the financial aid system they have to work with. Students do not experience policy writ large, instead, they experience the individual experiences of dealing with the financial aid office and staff at their institution (Lipsky, 2010, pp. 10-11). To do this work well and to have any chance of understanding and changing the system, I need to contextualize the individual actions of financial aid

administrators as they exist as small cogs in the system. A system designed to place the onus on students to jump through administrative hoops that rewards financial aid administrators for crossing every T much more than it rewards them for helping students. Additionally, financial aid staff are faced with dealing with issues wider society seems to prefer to ignore. Nisar and Masood (2020) pull together ideas of administrative burden, Foucauldian concepts of subject formation, and the work of SLBs by arguing that SLBs deal with disgust at the marginalized, so wider society does not need to. I do not believe that disgust is the correct feeling when considering financial aid staff; dealing with the despair and disappointment of students who cannot afford college is. Society underfunds higher education while telling students they must attend to be successful and leaves financial aid staff to face the ordeal of informing students and families about the harsh realities they must face with paying for college.

I augment the understanding that Lipsky provides about street-level bureaucrats with Zacka's (2017) work. Zacka uses the idea of street-level bureaucrats to explore ideas of compliance and the use of discretion amongst street-level bureaucrats, both the formal discretion granted them by the systems they work within and the 'real discretion they wield on the ground' (Zacka, 2017, p. 34). Zacka suggests that there are critical differences between discretion as granted and wielded. Understanding these differences between discretion as granted and discretion as exercised is a vital part of understanding the work of financial aid staff. The financial aid system codifies very broad discretionary authority for financial aid staff. However, that discretion is functionally constrained by the lack of resources needed to exercise that discretion effectively. The focus on compliance at a systematic level also emphasizes the need to focus on meeting regulations, placing greater importance on that than on using discretionary authority to provide additional support to students. Exploring the tensions present around how, when, and why financial aid staff utilize discretion can aid in understanding why they adopt more of a compliance-based approach to their work versus one of advocacy and how the system as constructed pushes staff toward one approach or the other. While generally finding both Lipsky's and Zacka's approaches to be helpful in the analysis of this work, there are limitations. Howe (1991) has suggested that the rules and regulations most SLBs operate under provide more stringent constraints that Lipsky acknowledges, suggesting that practitioner autonomy is dead or dying. Based on personal experience and alternative, more nuanced critiques, I suggest this is an overly antagonistic line of criticism. It is probably true that by placing too much emphasis on SLB discretion, Lipsky assumes that

SLBs are always trying to subvert organizational goals, as Evans (2010) has suggested. However, the heavy emphasis on subversion likely exaggerates how far from their organizational goals SLBs are willing to stray. Evans also suggests that lower-level management are often viewed more as allies in exercising discretion than they are viewed as dictatorial supervisors to be bucked (Evans, 2010). Evans and Harris (2004) have posited that some curtailment of discretion is not necessarily a bad thing in the context of social work, which shares a good deal of similarity with financial aid work. That in fact, strong, well-documented procedures can help guide and give structure to discretion. Moore (1987) has critiqued the assumptions present in treating SLBs as monolithic when there are clearly significant variations in how individual SLBs approach their work. Discretion is not a 'zero sum game' after all (Murphy & Skillen, 2015, p. 638). Zacka's work (2017) goes some way to addressing the idea that SLBs all approach work similarly with his typology of SLB approaches, as do I by adopting a similar schema. However, this remains an important caveat. There is enormous variation in the types of workers who are considered to be SLBs and assuming they all approach their work with similar goals and expectations is perhaps both optimistic and naïve.

Too much discretion can be a negative. Exploratory work by Bashir and Shakil (2020) suggests that higher levels of discretion can lead to work patterns that are convenient for the SLB rather than supportive of their clients or the policy goal they are working towards. Similarly, Karseth and Møller (2020) have found that increasing discretion in the name of providing more flexibility to support students can lead to less support for those students. Smart (2018) has argued that too much discretion can even be deeply corruptive. This is perhaps at the extreme end of the spectrum, but it does speak to issues present in this work that discretion does not have to be exercised, particularly when it can lead to more work for SLBs. Lipsky, to an extent, assumes that SLBs will always want to exercise discretion, perhaps missing a key reality of SLB work where edge cases that require discretion also tend to take more work. This misses the reality that Smart speaks to of too much discretion being problematic. Alternatively, SLBs can choose not to exercise their discretion at all, supporting Hupe and Hill's (2007, p. 283) contention that SLBs often form policy as well as following and enacting it, and in some cases can form policy through choosing inaction in the face of edge cases. This has been an issue in financial aid, with recent legislation including a provision that requires institutions to change policies of denying all professional judgement

requests (National Association of Student Financial Aid Administrators, 2021). Previously it was legitimate for an institution's appeal policy to be that they did not allow any appeals, regardless of circumstance. The reluctance to use discretion may stem from 'practitioners denying their discretion in order to protect themselves from blame' (Evans & Harris, 2004, p. 889) when something goes wrong. The very fact that new legislation now compels financial aid staff to exercise their discretion shows that discretion by itself is not a panacea for managing the implementation of complex policies. Discretion has to be accompanied by the willingness to exercise it.

4.4. Administrative Burden

The third strand of theory and approach that I pull on in this work are the ideas of administrative burden that have been so clearly articulated by Herd and Moynihan (Herd & Moynihan, 2019). Their work on how the state has increasingly shifted responsibility from the state to individuals sits at the core of the story of financial aid, where the importance of students getting it right has increased as the price of college has increased, while the system has remained maddeningly complex. Additionally, the efforts by the state to push more and more responsibility onto students and families has also resulted in colleges and universities bearing more responsibility as well. Generally, this additional responsibility has come with little to no additional resources, so the story of administrative burden has become one of increased administrative workload for students and their institutions. Herd and Moynihan's work places particular emphasis on the fact that programs designed to serve and support the poor, including the financial aid process tend to have the greatest administrative burdens to overcome (Herd & Moynihan, 2019, p. 39).

In financial aid, the administrative burdens have steadily increased (Bidwell, 2018; National Association of Student Financial Aid Administrators, 2015; National Association of Student Financial Aid Professionals, 2020) at the very same time that minoritized students, who typically have less social and cultural capital to navigate complex bureaucracies, have been enrolling in college at higher rates (National Center for Education Statistics, 2020b). This has led to an increasingly large number of students dependent on financial aid to pay for college. In response, financial aid has maintained high levels of administrative burden with limited support for either students or financial aid staff. The result is students who face losing their

ability to pay for higher education if they are unable to run the gauntlet of administrative burden, and financial aid staff forced to spend more and more of their time policing students in the face of being policed themselves by audit standards that ensure a continued focus on compliance over student support and advocacy.

Herd and Moynihan's work is an essential final pillar here as they speak explicitly to the challenges that nudging actions face when it comes to complex systems like financial aid, given that parts of this study focus on how to nudge financial aid staff toward making different decisions or to equip them with the skills and knowledge to adopt novel solutions to the wicked problems they face on a daily basis. Moreover, there are distinct similarities between discipline and administrative burden and how it is employed to limit or control who has access to public supports. The administrative burden of the financial aid system represents a deliberate attempt to discipline, and even at times it seems punish both staff and students, ensuring that only those who are willing and able to jump through the hoops. As Herd and Moynihan note, 'The programs targeted at poor people from Supplemental Nutrition Assistance Program (SNAP) to Medicaid, tend to have the greatest administrative burdens' (Herd & Moynihan, 2019, p. 39). We have decided to punish people for no greater offense than being poor, and the mechanism of this punishment is through layer upon layer of administrative burden.

The adage of it is expensive to be poor, can be related both to the price of living paycheck to paycheck but also in the time and effort required to access any kind of support service, whether FAFSA, the Supplementary Nutrition Assistance Program (SNAP), Supplementary Social Security Insurance (SSI) or any other kind of means-tested governmental benefit. All these types of support mechanism have one thing in common, they are aimed at people with low to moderate incomes and tend to require significant labor on the part of the recipient to receive them. Students face this discipline by making it harder for them to navigate the financial aid system and get the support needed to pay for college. Staff experience this discipline through the ever-present threat of sanctions if they fail to comply with regulation, even when doing so comes at the direct expense of students, they are ostensibly meant to put first in their work.

The ideas of administrative burden are a key part of this work as it speaks to ideas of deservingness, whether students should be able to navigate complex systems as part of

“earning” their place in higher education. Further, this speaks to who should ensure that students can easily access supports like financial aid. Does the burden fall on the state, on institutions, or individual students? This tension of who takes responsibility cuts to the core of how financial aid staff operate. If the state is responsible, it potentially shifts the conversation away from a heavily compliance-focused approach to financial aid and nearer to a more supportive advocacy-based approach. If institutions are responsible, they inevitably fall into troubled waters, beholden to students and the state, in a tug of war that the state and all its regulatory power will win every time. To a large degree, this is the situation we currently find ourselves in, where institutions are the ultimate middleman; ensuring that students meet the state's compliance requirements so that the state will not punish the institution through loss of access to federal dollars. At the surface, this may seem little different from students with ultimate responsibility. However, the key difference is that this approach sets up students and institutions antagonistic toward each other.

Students primarily experience the policies enacted by the state at an institutional level, so when faced with high levels of administrative burden, the blame is primarily placed on the institution rather than on the state, which has determined the regulations the institutions are enforcing. The state can quietly let itself off the hook and leave institutions to do all the explaining. Lastly, if students are ultimately responsible, it remains easy to hold fast to a heavily compliance-focused approach. If students are responsible, then it becomes their fault if errors are made on forms or if they cannot complete paperwork on time. This builds the narrative that students capable of attending college should be capable of filling in a few forms and that those who cannot or will not do that are somehow unworthy of the privilege. The practical ideas of administrative burden are inextricably linked to the questions I intend to raise around who should be responsible for getting students the help they need to succeed in college.

4.5. Plaiting three threads of theory

Pulling together the literature on financial aid issues and separating it into the three groups I present, the way students experience the system, efficiency approaches, systemic flaws, and the undercounting of student need provide a broad overview of the work conducted on financial aid issues at present. This review also shows the limited research on the experiences

and approaches of financial aid staff as a key component of the financial aid system. Given the crucial role that financial aid staff play as gate keepers to the financial aid system, this is a significant gap. This work can add to the small body of research that has considered how financial aid staff approach their work and the effect that has on the experiences of the students they serve.

By drawing on three distinct theoretical perspectives, I am creating a more robust framework for my research. Murphy (2016, pp. 13-14) has noted that utilizing theories in this hybridized way is key to intellectual creativity, allowing for new theoretical developments to take place. That is very much my goal in plaiting these different theoretical approaches. Lipsky, bolstered by Zacka, with a modern exploration of SLB's work in a society even more precarious and austere, provides the key to understanding the street-level work that financial aid staff is engaged in every day. This also allows me to weave in my own professional experience while maintaining a foundation based on the literature. The use of discipline from Foucault, and Ball's interpretations of his work, helps to explicate the way that financial aid staff are pressured to comply with onerous administrative requirements as much as they pressure students to comply with those requirements. The basis for these onerous administrative requirements are better explained through the use of Herd and Moynihan, providing the context needed to show that financial aid is not an island of administrative burden. Instead, it is part of the ecosystem of such requirements that make it harder for those most in need to access the programs ostensibly designed to support them.

Chapter 5. Methodology

5.1. Project Overview

I come to this project having moved from a position of shared experience with the study subjects to one of observing and evaluating the subjects of the study. Prior to my current role at the Hope Center, which bridges research and practice, I was a financial aid administrator, working at two different universities over six years. I have done the same jobs and faced many of the same challenges that the study participants face in their jobs. I have had to manage all of the competing job pressures that Street-level Bureaucrats (SLBs) encounter, stemming from the systemic complexity I laid out in my previous context-setting chapter. As a result, I come to this research with a deep understanding and sympathy for the challenges that the professionals in these roles face on a daily basis and an acknowledgment of being sympathetic to those challenges.

Paradigmatically I take a constructivist approach to this work. I hold to the idea that the meaning embedded in financial aid administrators' work is built out of shared understandings and language that builds the complex structure that makes up the world of financial aid. A complex structure where understanding is dependent on knowledge only held by other financial aid administrators. Given that the entire financial aid system has been seemingly constructed to make little sense to anyone in the real world (see context chapter for more on this), it seems perfectly apt and appropriate to choose a paradigm that gels with that approach. As noted by Lincoln and Guba (1994) and Owen (2014), constructivism provides room for me to weave in my own experience and accept that I do not approach this work from a purely objective standpoint. In fact, I think it would be naïve to think that I do. By acknowledging my place in this work as both a financial aid practitioner, former financial aid SLB (Lipsky, 2010), and now a researcher, I hope to mitigate any bias that may come in from those different roles while still drawing on the expertise and knowledge that the practitioner work provides me with to enhance my research work.

5.2. Position of This Work Within a Larger Study

As I have previously noted, the data used for this research was part of a larger project, called the Real Price of College. The Principal Investigator for that larger study was Dr. Sara Godrick-Rab. I was the project lead for the day-to-day work of the project, with final decision rest with Dr. Goldrick-Rab. My role was to lead the day-to-day work of the project. This included being the primary contact for the with project leads at each institution, developing the surveys, leading the workshops and other information provided to project leads and financial aid staff. For the purposes of my own research, I was able to use the data we were already collecting to try and answer a very different set of research questions than those being addressed in the main study. This created some challenges and limitations with the data available to me. Except for adding some questions to the surveys fielded, I was not able to adjust the methodology of the study. This presented some challenges.

The questions that I am trying to answer in this work might be more readily answered by using interviews rather than surveys. My original intention had been to conduct some interviews in addition to the surveys that we fielded, unfortunately as I was not able to secure permission from the projects' PI to conduct interviews in addition to other data collection methods and had to adjust my approach accordingly. Interviews would have provided richer data, although from a smaller sample size, and might have allowed me to dig deeper into the reasons that financial aid staff go about their work in the ways that they do. An interview-based approach might also have helped provide more nuance to the analysis, allowing me to more effectively determine whether financial aid staff approach their work through a compliance versus advocacy lens.

5.3. The Importance of Institutional Context

Institutional context and resources matter a great deal for understanding how and why staff approach their work. Lane and Brown (2004) provide a particularly useful overview on the particular importance of context when it comes to institutionally focused research in higher education. While this research is not focused at the institutional level per se, institutional context undoubtedly matters from a resource perspective. Institutional context is particularly useful when trying to determine whether staff approach their work from an advocacy or compliance perspective. I note throughout this work that one of the driving forces for financial aid staff behaviors and choices stem from the financial aid system that constrains

them. That system is not limited to regulations, it also encompasses the often limited resources available to financial aid offices and staff. The resources, particularly staff resources, available at each institution could increase or limit how much time financial aid staff have to spend explaining complicated financial aid issues to students.

One of the challenges in this research was the very limited data collected on the institutional contexts of the financial aid staff and project leads I was working with. This was due in part to the design of the larger study that my data is drawn from. Institutional context was not explicitly addressed in the larger study so was not available when I conducted my own analyses. I did consider gathering institutional contextual data separately from the main study but realized it would be challenging to use within the privacy we had assured both institutions and individual respondents would receive. We had promised not to publicly identify results from individual institutions. Additionally, individual survey respondents had been assured a high degree of anonymity in their answers. Several of the financial aid offices had small numbers of staff, so breaking answers down by institution could have identified individual staff. This made it challenging to provide individual institutional context without being able to attach that context to survey responses. I felt these limitations would reduce the explanatory power that institutional context would provide.

5.4. Sample Description

This project was undertaken with six individual institutions, four community colleges, and two universities located in Texas. Four of the institutions are located in more rural areas of Texas, and two are from large urban metro areas. Project participants represent two distinct groups. Data collected was focused on the needs of the main project, called the

1. Institutional leaders who acted as primary institutional contacts and project leads for the study
2. Financial aid staff at each of the six institutions

There were two project leads from each institution, many of whom held leadership positions within the financial aid offices at their respective institutions, most typically as financial aid directors. The remaining institutional leaders are primarily in senior leadership roles in student affairs and enrollment management. Eight of the project leads primary responsibility is to manage their institution's financial aid offices or to oversee financial aid as well as

additional institutional offices. Eight of the twelve project leads are from the four community colleges participating in the project, and four are from four-year institutions. Project leads were surveyed a total of five times. Three times with a survey administered only to project leads, in which respondents were not anonymized, and twice by participating in the surveys administered to the financial aid staff, which were anonymized. All surveys were administered electronically using the Qualtrics survey platform.

The sample used for the surveys was a sample of convenience based on the institutions that had agreed to participate in the larger project. This second group are financial aid staff from each of the six institutions. We asked project leads to identify all student-facing financial aid staff at each of their institutions. Surveys were then sent to all financial aid staff identified by the project leads at each institution. Project leads also actively encouraged staff to complete the surveys. For five of the six institutions, this meant staff in a singular financial aid office were completing the survey. One of the institutions has seven different campuses, each with its own financial aid staff as well as a centralized service for processing financial aid documents that they outsource, staff from each campus office were surveyed. I did not survey anyone from the company the document processing work was outsourced to.

The total number of staff the surveys were sent to was 152, plus the 12 project leads for a total of 164 possible survey respondents. For the first survey, I received 109 responses. During data cleaning, any responses that had started the survey but had not answered any questions were removed. Respondents who completed less than 5% of the survey were also removed. This left me with 89 responses for a response rate of 54%. For the second survey, after completing the same data cleaning process. We received 121 responses for a response rate of 74%. It is possible that there were some changes in the sample of financial aid staff due to staff turnover between survey one and survey two, so the universe of potential respondents might have changed slightly in between surveys.

I served as the primary developer of the surveys, in consultation with the principle investigator for the project, who provided final approval for all data collection. The survey questions for the main project overlapped with the questions I wished to address. I was also able to add in questions that were not used in the main study. I was able to add the open ended questions, and the question asking about number of years of experience in financial aid. The survey data for the larger project and the data I use here are the same. The primary difference

was that there was no analysis conducted of the open-ended responses from staff in the larger project. Those data were collected as part of the same surveys, but were not analyzed for the Real Cost of College project¹¹.

Financial aid staff were surveyed completely anonymously. Due to constraints on the larger study that my data was drawn from it was not possible to collect demographic data for the participants, so I do not break down responses by categories like race or gender. The principal investigator for the larger study decided that demographic information would not be collected for several reasons. One was to keep the survey as short as possible to ensure participants' time burden was limited, it was also decided that not collecting demographic information would enhance anonymity for respondents. Given the small sizes of some of the financial aid offices participating in the project, collecting demographic data would have made some respondents too easily identifiable. We also wished to allow staff to respond to the surveys completely anonymously to encourage candid responses. By limiting any fear of their being identifiable to either myself or their managers, we hoped to encourage forthright responses in the surveys.

In an attempt to gain some understanding of the overall demographics of respondents, I sought out information on the overall demographics of the financial aid profession in the U.S. Demographic data on the financial aid profession as a whole is quite limited. The best available data comes from NASFAA (2019) as part of their salary benchmarking reports. The most recent of those reports had a total N of 13,732. NASFAA represents institutions that have over 28,000 financial aid staff, so the reported N provides a large sample to work from. Based on this data 77% of financial aid staff are women and only 23% men. I have not been able to find any breakdown of those who might be no-binary.

5.5. Survey Details-Project Leads

All surveys were conducted with a planned pre/post intervention approach. For project leads, the first survey was fielded before participants had received any information about the project. Then the follow-up surveys were delivered shortly after points in the study where project

¹¹ More detailed information for the Real Price of College project, including all publications that resulted from it, can be found here: <https://hope4college.com/rpc-toolkit/>

leads had received some form of intervention that I hypothesized might change their outlook or understanding of the issues involved in the project. Similarly, financial aid staff were surveyed before and after an informational intervention was delivered.

Surveys were delivered to project leads by email, using the Qualtrics survey platform, follow up emails were sent to those who had not completed the survey within two weeks of the initial survey request. All data was collected was initially for use in the larger Real Price of College project, although the analytical approach used in that project was quite different than the approach used here.

Table 2. Data Collection method and respondent’s overview

	Survey 1- Leads	Survey 1- Staff	Survey 2- Leads	Survey 2- Staff	Survey 3- Leads
Project leads	x	x	x	x	x
Financial Aid Staff		x		x	
Month administered	October 2019	October 2019	November 2019	December 2019	December 2020

At the start of the research, the project leads were surveyed to ascertain their understanding of the financial aid concepts we wanted to improve knowledge of.¹² This included questions about how calculated need operates, whether the project leads understood the idea of a negative Expected Family Contribution (EFC), how their institutions went about calculating Cost of Attendance (COA), whether they thought that their institutions COA was accurate and what percentage of their students they believed were receiving completely accurate COA information. Project leads were then invited to a meeting where we spent half a day discussing the concepts they were surveyed on. This meeting included presentations from myself and other team members working on the larger project. Presentations focused on the problems with COA calculations, the underlying problems with the EFC formulas, particularly the problems with the Income Protection Allowance (IPA) that I discussed in the

¹² See Appendix A for the full survey administered.

context chapter, and why it was so important that we calculate these things as accurately as possible. Project leads also received presentations from research partners about how we would go about calculating negative EFC for their students and what some of the implications for negative EFC were, most notably that negative EFC would indicate that students have much more financial need than official calculations would suggest.

A key part of this meeting was a human spectrogram¹³ exercise at the start of the session to visibly surface the different levels of understanding of financial aid issues from the different project leads. This exercise asked participants to physically place themselves on a spectrum of understanding about the key questions we were asking in the project. Questions like whether they thought the current calculations for student financial need and COA were accurate or not, or whether they felt that the current financial aid system met enough of student financial need. Conducting this exercise in person provided helpful information about project leads understanding of the questions we sought to answer, as well as helping to give context on which of the project leads were more sanguine about the deficiencies of the current system than others.

The broad goal of the first project meeting was to provide context for the project leads on how and why official calculations of financial need are inaccurate and contribute to students and financial aid staff having poor and inaccurate information to work with. This meeting was the first part of determining whether providing simple information-based interventions to the project leads and financial aid staff might shift their thinking and understanding of how well the current financial aid system was meeting the needs of students. The meeting operated as one piece of the overall informational intervention of the project.

The project leads were surveyed a second time one week after the initial project meeting. This second survey asked the same questions as the initial survey. The only difference was that we asked project leads to update their answers if their understandings about the issues being

¹³ This is a variation of an exercise where we use people to represent where they stand on a scatter plot using their bodies as the physical representations of data points. The room was divided along four axes that corresponded to answers to questions the project leads were posed about their understanding and feelings on the current financial aid system. After being asked each question the project leads were asked to place themselves physically in the part of the room that corresponded to their answer. This exercise serves to help illuminate where each person stands on a particular question in a very physical way. This exercise also helped to illuminate which of the project leads were perhaps more skeptical about things like negative EFC at the project's outset and which project leads had the best understanding of the concepts we were introducing. See this page for further information (Wageningen Centre for Development Innovation, 2012)

asked had changed after receiving the information we had presented at the initial project meeting. Project leads were identified in each survey to track changes in response from one survey to another. We did not collect demographic data on the project leads. The small group size would make any demographic data essentially unusable for any kind of helpful analysis.

The third survey for project leads was delivered after providing them with memos about negative EFC rates and magnitudes at their institutions. These memos provided data on the percentage of students who had negative EFCs, broken down by various financial aid, academic, and demographic characteristics. These included race and ethnicity, gender, GPA, Automatic zero EFC status, and student or parental income level, as well as the size of those negative EFCs for the students who had them. This final survey added questions about the ways that the project leads would consider using negative EFC and whether they would share the information with students or with their frontline staff.

For all the open-ended questions in the project lead surveys, I chose not to force answers, allowing the project leads to bypass those questions if they chose to. However, it also proved impossible to obtain responses from all the project leads on every survey round. This was partly due to the institutions changing who was representing them as a project lead after the first survey, and one project lead moving a new job at a different institution. However, by using the same core question set across all three surveys, I obtained at least two responses to each of the open-ended questions from all, but one of the project leads. This provided the ability to analyze changes in understanding over time from each of the project leads.

5.6. Survey Details-Financial Aid Staff

We conducted the first survey of financial aid staff while the second survey of the project leads was administered. Financial aid staff were surveyed to help understand their familiarity with the underlying formulas in the FAFSA, how they explained complicated financial aid issues to students and families, what sort of supports their institution had that went beyond traditional financial aid, and how comfortable they were in referring students to those support services. We used skip logic in the surveys to reduce survey fatigue. The skip logic ensured that staff were only asked about their comfort in referring students to a particular support

service if they had first indicated that their campus had that support service available to students.¹⁴

After the first survey of financial aid staff was administered, financial aid staff and project leads were invited to participate in two webinars. One webinar focused on emergency aid, providing a primer on emergency aid issues, ways to disburse it, and why it was a valuable tool in supporting student success. We provided suggestions on different models of running emergency aid programs and information on some of the pros and cons of different models. We also provided a short explanation of how flaws in the financial aid system created the need for emergency aid programs. This information was an abbreviated version of what we provided to the project leads during our initial project meeting. In addition to the general overview of emergency aid, I had someone from one of the project colleges present about the work they were already doing on emergency aid at their institution. This allowed us to provide insight into what it looks like to run an emergency aid program on the ground and provide information on some of the emerging best practices.

The second webinar focused on public benefits access for students. This webinar was run by a Hope Center affiliate who has significant expertise in benefits access in general, particularly benefits access for college students. The webinar focused on the types of public benefits available to students, and the unique challenges students can face when trying to qualify for these types of assistance. The webinar focused on how financial aid staff can use information about benefits access to support students outside of the regular financial aid system. The goal of this webinar was not to suggest that financial aid staff provide these supports themselves but instead to help them understand that there is a potential role to play in referring students to these services if they are offered on campus or in the surrounding community. Financial aid staff often interact with students the most frequently when it comes to finances in college and are likely to see and hear about financial challenges that students may be facing, which is why they were the primary audience for this work. These two webinar topics were chosen because they were the two support services that staff indicated they felt the least confident about referring students to in their responses to survey one.

Following the webinars, financial aid staff were surveyed for a second time to see if their understanding, attitudes, and willingness to refer students to support services outside of

¹⁴ See Appendix B for full survey administered.

financial aid had changed. A significant limiting factor of the potential impact of the webinars is the number of people who attended them. For the first and second surveys of financial aid staff, I received 89 and 121 responses, respectively. In contrast, the webinars were attended by fewer than 30 financial aid staff each. This limited attendance highlights a persistent challenge within this project. Namely, how to transfer buy-in and willingness to change from institutional leadership down to the frontline staff. Project leads have actively participated in all aspects of the project, but it has been a struggle to transfer that enthusiasm and knowledge learned to frontline staff. With multiple competing priorities and usually limited capacity to take on work beyond the necessary day-to-day tasks, it took concerted effort to get the needed buy-in from project leaders. Getting that same level of buy-in from their staff is much more challenging. Keeping that in mind, I was hopeful that even small shifts in understanding and approach were indicative of some small measure of buy-in. Given the positions of the project leads, I also surmise that changes in their understanding might facilitate broader cultural shifts if they were able to help inculcate those changed understandings within their staff.

All of the surveys, both those delivered only to project leads and those delivered to leads and financial aid staff, combined Likert scale type questions and open-ended text entry questions. The surveys were analyzed using Qualtrics inbuilt analysis tools for quantifiable data. Open-ended questions were coding manually in excel using a cyclical process, as suggested by Saldaña (2016). This cyclical approach allowed me to create an initial coding scheme to determine my initial coding buckets and then further refine and split codes to provide for a more detailed set of codes. This process was used to identify three broad types of responses in the open-ended questions. The three broad types of responses were used to create the three different vignettes that I utilized as an analytical and explanatory tool throughout the rest of the study.

5.7. Analytic Approach

My approach using research vignettes was not precisely like creating themes as is common in different types of qualitative analysis. However, it was similar enough that adopting the ideas of thematic coding to create the three different vignettes was useful. My approach to the analysis is adopted from Braun and Clarke (Braun & Clarke, 2006; Braun, Clarke, Hayfield, & Terry, 2019). The six-stage process that Braun and Clarke lay out for Thematic Analysis

provided a linear approach to dealing with my data from start to finish while providing the iterative approach to coding I wanted to undertake. I chose to code inductively, rather than deductively, allowing the data to inform my thinking, rather than approaching the analysis with pre-set codes and forcing the data into them. I come to this study with an extensive professional background in financial aid and the literature surrounding this topic. This experience meant I came to the qualitative analysis process with a well-defined hypothesis. So, while my approach was inductive, it was bounded by a robust analytical framework from the outset. This framework undoubtedly guided my thinking. I initially defined my codes narrowly, placing the different open-ended survey responses into the three broad categories that eventually became the three different vignettes I am using. I then iterated the coding process to widen the scope of my scheme on each subsequent read through of the data to help reveal the nuance of areas where responses could cross from one ideal type to another. This allowed me to pick out important details while still allowing for the broad themes embodied in the three vignettes.

5.8. Quantifiable Survey Responses

The hypothesis in this work is that providing financial aid staff with better information about some of the problems and challenges within the financial aid system might lead them to be more willing to consider approaches and solutions that are more advocacy-focused and go beyond the traditional financial aid system. The quantifiable responses to each of the surveys administered were analyzed to help determine whether there were any changes in overall responses from one survey to another after project leads and financial aid staff had received more information on the challenges within the financial aid system. Each survey's responses were coded and compared to determine whether there had been any shift in understanding. Due to the study's design, with no linking of responses at the individual level from staff survey one to survey two, and its exploratory nature, conclusions drawn are necessarily cautious. When combined with a review of the qualitative information, shifts in thinking in the quantifiable data can help paint a more detailed picture of any changes in attitude and understanding among the project leads and the financial aid staff.

The baseline surveys administered to both financial aid staff and project leads were reviewed to see how well staff and project leads understood concepts like federal methodology, student

financial need, and ideas like negative EFC. The answers to these baseline surveys were used to help shape the informational interventions that were delivered to financial aid staff and project leads. The surveys responses were also reviewed to determine if there was additional information that I might wish to gather in subsequent surveys. The second set of surveys for financial aid staff had some questions added because of seeing where there might be room to fix gaps in my understanding. Additional questions in survey two included adding questions about attitudes towards how easy or difficult it was for students to request and complete appeals and how long staff had worked in financial aid. These additional questions helped determine whether there was any correlation between length of service and the ideal type that a staff member tended to adopt.

Responses to the second set of surveys were compared to the first for project leads and staff to determine to what extent, if any, their thinking about key questions might have changed. I compared the project leads responses to determine whether we had improved their understanding of the key concepts like negative EFC and student financial need. For staff, I primarily focused on comparing whether staff had a better understanding of supports for students outside of the traditional financial aid system and whether we had increased their willingness to refer students to those types of supports. I also analyzed to what extent they felt their current processes for appeals were easy for students to manage or not. This last question was not included in the first survey, so I could not compare it to prior data.

5.9. The Use of Research Vignettes

Research vignettes have been used in two different ways for qualitative research. Some approaches, particularly those used by researchers in medicine and psychology, solely use vignettes as part of question constructions in survey work. These approaches include work by Gourlay et al (2014), Hughes and Huby (2004), and Finch (1987), who have all used vignettes as a method of gaining a better understanding of complex topics such as beliefs and values. These approaches use the hypothetical vignettes to find ways to connect with survey respondents to gain a more nuanced understanding of responses to surveys and interviews. They are using vignettes as part of their research input rather than as an output of the analysis process.

The second approach to using vignettes, and the one I adopt here, is to use them as a form of ideal typing and method of analysis. Langer (2016) uses this approach to construct meaning from qualitative data, creating a way to better understand deeply complex answers that can be grouped in a more interesting and engaging way than a typical qualitative coding scheme. Christensen (2013) has used a similar approach to define ideal types of coach, which, while quite different in context, is similar in application to my approach to vignettes. My approach here draws from Langer's use of this method as an output of the research and analytical tool and Christensen's method of using it to define ideal types. I also draw on the vignette approach that Zacka (2017) has used in his work on SLBs to understand the realities of working in a front-line service provider role. A limitation of this approach for my work is that Langer, Christensen, and Zacka all applied the method to interviews and ethnographic work rather than surveys. I recognize that survey responses are more constrained, even when open-ended, but have taken care to use the responses to create vignettes with an understanding of these limitations to avoid over-interpretation of findings.

5.10. The Benefits and Drawbacks of Vignettes

There are naturally benefits and drawbacks to any chosen method of analysis. In this instance, the benefits come from drawing together the threads of different responses to survey questions to create an outline of how financial aid staff respond to different situations with their students. It also provides insight into the different approaches financial staff take when working with students. On the surface, it might appear there are many different approaches, but once data was used to build the vignettes, it became clear that work approaches could be fit into the three different vignettes I use. The method also allows for the construction of vignettes that represent multiple potential coding responses, presenting a more nuanced construction than only looking at individual codes.

The primary challenge that vignettes like this present are the reality that the result is a series of ideal types to represent a large group of staff. It is likely that the staff in question never fit wholly into one of these types, they may be more indifferent some days than others or might become more or less advocacy-focused throughout their careers, which I explore further in my analysis. There is a risk of oversimplifying very complex humans down to three overly broad types. There is also the question of my own bias as I assign different survey responses to different vignettes; this can never be totally avoided in qualitative research. By completing

a multi-stage coding process as recommended by Saldaña (2016), I have done my best to ameliorate any bias I bring to the analysis. By employing a multi-staged coding process, I was also able to reduce my desire to give the financial aid staff too much benefit of the doubt. After a second coding round, I found that there were far fewer responses assigned to the advocacy mindset than in the first round, possibly due to an initial desire to see fellow financial aid practitioners in the best light possible.

This approach of ideal typing is similar to that used by Zacka (2017) in his recent work on SLBs building on Lipsky (Lipsky, 2010) to add a moral component to the behavior of SLBs. I use a slightly different naming convention but very similar definitions to Zacka. The SLBs Zacka worked with hold different roles from financial aid staff. However, they still fit well within the idea of street-level bureaucrats operating, as they do within a field with numerous regulations, directly with people, and with high degrees of discretionary decision-making power. The moral imperatives that Zacka introduces provide additional analytical power to assess why financial aid staff approach their work in the manner they do, whether because they see students as more or less deserving than each other or for reasons of pragmatic workload management.

5.11. Using Data and Theory to Create the Research Vignettes

From the theoretical side, I used Zacka's approach to SLB vignettes as my starting point. Zacka's typology of SLBs splits them into three different groups, the indifferent, the enforcer, and the caregiver (Zacka, 2017, p. 66). I utilized this approach as the starting point for my similar typology. Next, I created vignettes drawn from my data to create the indifferent, advocate, and compliance-focused financial aid counselors based on the data. As noted earlier, my approach to the open-ended answers to survey questions was to initially code them using an approach similar to coding semi-structured interviews using a cyclical approach recommended by Saldaña (2016). This method allowed me to code the answers at a high level and repeat the process to drill down into more fine-grained detail. Finally, the top-level coding was used to establish my typology of financial aid staff, represented by three vignettes of the differing types of financial aid advisors within the sample. These types are:

1. The compliance-focused counselor

2. The advocate counselor
3. The indifferent counselor

These three types were selected for three reasons. First, the types emerged from the data quite clearly. There were distinct responses fitting each of the types and showing a propensity for respondents to seat themselves in one of the vignettes. I lay out some of the representations of the data below. Second, the advocate and the compliance-focused counselors are expressions of the key roles that financial aid plays within the American higher education system.

Financial aid publicly talks about its role as a caring, advocacy-focused profession; financial aid helps students succeed, supports student's dreams, helps students who might not be able to attend college do so. Simultaneously, financial aid is awash with rules that must be reported on, controlled for, and met, irrespective of whether the rules are good for students are not.

These two ends of the financial aid world are very clearly represented in the work itself, and as such, the people who do the work. The indifferent counselor is the balance wheel in the middle, it can both represent individual workers and an attitude, where the counselor who was an advocate when they started their career perhaps no longer cares quite as much fifteen years later, or where the person who is fired up to support their students on Monday wants to go home for the day on Friday rather than processing one final appeal.

I acknowledge that these three types provide neat, seemingly bounded categories to sort financial aid staff into. The reality, as always, is messier and more complex. As I lay out below, there were clear reasons based on the language and phrases used to divide responses into these three ideal types. However, the review of the data shows overlaps and even different approaches within individual answers. That does not take away from the usefulness of the ideal types, and instead, it speaks to the challenges and tensions that financial aid staff face regularly. For example, deciding whether to put their compliance obligations ahead of desires to support and serve students, or vice versa. I also acknowledge that a respondent who answered survey questions in a compliance mindset one day might take on a more advocacy-focused approach when faced with a student in crisis.

The coding process to establish these three types was to sort the answers provided into those that represented each approach to the work of financial aid counselors. Answers that demonstrated an approach suggesting no willingness to consider that students faced unmet financial need at their institution, or an unwillingness to consider student appeals were coded

as compliance-focused. Answers that showed evidence of attempting to provide students with more than basic information or that took approaches breaking down complex information into easy-to-understand steps for the students were coded under the advocacy-minded approach. It was most challenging to code answers that represented the indifferent type of counselor, as these answers are by their natures, the ones that fall most in the middle of the spectrum. Answers were coded as indifferent when they showed the counselor did not think beyond standard responses or did not provide help to students beyond providing a basic understanding of the financial aid process and calculations. One key indicator for answers coded as indifferent were if they represented the standard approaches utilized by the Department of Education.

The result of this coding process is the three vignettes that follow this section. By synthesizing each coding category, I drew together a board outline of how each ideal type approaches their job. The data I coded also largely matched my experiences working directly in financial aid, where I have had colleagues who fit into each of these ideal types. There are naturally limitations to this approach. Not all financial aid staff fall neatly into these categories. Some staff are amalgams of each type or may switch from type to type depending on the day, how heavy or light their workload is. However, the vignettes provide a useful analytical tool to work through the qualitative data in this study to consider how to move more financial aid staff towards an advocacy-focused approach and away from a compliance-focused one.

5.12. Vignette Descriptions

This section presents the vignettes themselves. As I have explained above, there seem to be three ideal types of financial aid staff. Of course, as with any ideal type, they are not perfect representations, and they do not capture every variation of working approach that exists in financial aid as a profession. Nevertheless, they provide a useful analytical framework for considering how financial aid staff approach their daily roles and the students they work with.

These three ideal types have been drawn together through a combination of professional experience working in financial aid offices for years, as well as providing training to financial aid staff in my current role. Adding to my professional experience is the analysis of the

answers to the open-ended survey questions asked as part of the data collection for this project.

When determining which survey responses should represent which vignette, I determined sets of words and approaches to place a particular survey answer into one of the three vignettes. This was done as part of the coding process. Words and phrases that emphasized rules, regulations, and the need to follow particular procedures were shared across the compliance-focused answers. For the advocacy-based words and phrases, I chose those that indicated care for the student or a desire to explain the financial aid process as well as possible to the student. For the indifferent word set, I chose words that expressed limited interest; these words also tended to be value-neutral compared to either the advocacy or compliance set. Below are the words and phrases that were used to determine which vignette an answer best represented.

5.12.1.1. Compliance minded approaches most frequently used words and phrases like:

Federal, Rules, Regulations, Determines, Assesses, Government, FAFSA, Loans, Available, Only, Maximum, Budgeting, Responsible.

Compliance answers also tended to appeal to external authorities such as governing boards that set tuition and unsurprisingly to federal rules and regulations, as well as institutional policies and procedures. Compliance answers were usually longer than indifferent answers but shorter than advocacy answers.

5.12.1.2. Indifferent minded Approaches most frequently used words and phrases like:

Amount, Tell, Show, not an issue, does not happen, Maybe, Most Likely.

Indifferent answers were usually the shortest answers and generally failed to explain or elucidate, neither presenting answers that helped explain things to students or that relied on appeals to regulation and/or external authority.

5.12.1.3. Indifferent minded Approaches most frequently used words and phrases like:

Sit down, Explain, Help, Understand, Step-by-step, Walk through, information, Go over.

Advocacy answers tended to be the longest answers. They also often offered additional options or suggested that they would refer students to additional resources where possible.

It is worth noting that financial aid, as with many SLB roles, does not have a standardized approach to training or licensing. A large portion of financial aid staff, approximately thirty percent at the last institution I worked at, start their financial aid careers as student workers. This creates a quasi-apprenticeship training model for staff. There are naturally pros and cons that come from this approach to professional training. The feature of this training approach most important in the context of ideal types is that it tends to replicate the approach of those who do the training. So, an office run by a director who values compliance over everything else is more likely to produce staff who take a compliance-first approach to their work. Directors who favour an advocacy first approach will likely create an office in that model and so on. Confounding all of this is the fact that there are strong incentives for financial aid offices to take compliance-focused approaches, as errors can, in the worst cases, lead to potential loss of financial aid eligibility for the institution (Mandaro, 2015). Most institutions cannot financially sustain themselves without students who can access federal student aid. Hence, losing access to those resources is a powerful incentive for colleges to focus on compliance first approaches.

These three vignettes were developed based on the answers to the three open-ended survey questions asked of financial aid staff and project leads. Those questions were:

1. How do you explain to a student how EFC helps determine a student's financial aid package?
2. How do you explain your institution's Cost of Attendance (COA) to a student?
3. How do you explain that financial aid will not cover their full COA to a zero EFC student?

These questions were designed to ascertain whether financial aid staff were willing to do several things:

1. Did they understand the limitations of federal financial aid?
2. Were they able to explain the limitations of federal aid and what it will pay for to students who are often confused about their financial aid being much less than their cost of attendance?

3. Were financial aid staff able to go beyond answering basic questions to explain issues like cost and EFC thoroughly?

5.13. Vignette Types

5.13.1. The Compliance-focused counselor

This financial aid counselor is primarily focused on the need to follow every rule to the letter even when there is significant leeway provided for them to give students grace or to provide latitude in financial aid processes. As already laid out, vast amounts of regulation and paperwork are attached to the financial aid process. Some financial aid staff view these bureaucratic processes as ones that exist to help students navigate and provide latitude on when needed, providing they can do so within the scope of regulation. Compliance-focused counselors view every rule and regulation as sacrosanct, treat missed check boxes as high crimes; anything less than a perfect explanation is a serious misdemeanor.

Compliance-focused counselors are likely to deny appeals or insist on new documents because one little thing was missed off the original submission, and they often do so with little or no explanation provided to the student, other than “that is the rule.” Compliance counselors are the reason that forms have multiple unnecessary fields. When asked why they are so focused on this type of granular detail, they will usually answer that they are protecting taxpayer funds, or it is their job to ensure no one cheats the system. There is also the sad fact that the financial aid system creates compliance counselors. It is complex, with significant latitude for discretion. However, financial aid staff are often inculcated into a culture where crossing the Ts and dotting an I is as or even more important than ensuring that students are supported and get the help they need to navigate the complexities of the financial aid system. Compliance counselors tend to view the formalized discretion that they have as something that students need to earn; they find reasons to say no to appeals instead of trying to find a way to say yes to them.

The compliance minded counselor is typified by statements like:

“Based on the data that was submitted, this is what you are expected to contribute towards your education.”

“COA is determined by the Coordinating Boardbased on the various variable costs related to the institution.”

“Your tuition and fees cost exceeds the amount of funds that you will receive. Our school does offer a payment plan for any balance owed.”

5.13.2. The Indifferent Counselor

I must start by pointing out that there is nothing wrong with taking the attitude that a job is a job. I show up, I do my work, and I go home. I do not wish to suggest that people should martyr themselves for their work. However, this approach brings limitations, including limited desire and willingness to find creative solutions to challenges students encounter and a general unwillingness to push at the limits of the financial aid system’s flexibility.

This type of counselor is not so overly focused on compliance that they make things harder for their students, but nor do they go very far out of their way to explain complex concepts or help students gain a better understanding of things when they are confused by byzantine financial aid processes. This type of financial aid staff member answers the questions presented to them but never answers the unasked questions that students often do not know how to ask. They will do what is asked, but not always what is needed for the student to navigate the process successfully. They will provide the student with their financial aid award information but are less likely to explain how everything works. They will tell you that you can submit an appeal, but not how to write a good one or how to ensure it gets processed correctly. They do what is asked, but little more.

The indifferent counselor is typified by statements like:

“Here at institution¹⁵ 0 EFC does cover all their tuition costs.”

“Even though you have a \$0 EFC financial aid will not cover all costs because you are coded as an out-of-district student or out of state.”

“I let the student know that EFC is about the income plus family members.”

¹⁵ I have removed the names of institutions.

5.13.3. The Advocate Counselor

This is the counselor you want to get if you are a student with a problem or unique circumstance. The counselor who will go over every line of the forms with you to help you understand. They are the counselor who will break out exactly what each piece of an award notice means and help you decide whether you need to take out all your loans or not. These counselors push the envelope when it comes to appeals, they are trying to ensure that things are less complex, easier to understand, and generally more student-friendly.

Advocate financial counselors are the least common of the three types I present here. I have been fortunate enough to work with several of them and experience, plus the data obtained from this study and explored in detail in Chapter six, suggests that they represent twenty percent of financial aid staff at most. This type of counselor will endeavor to pre-emptively answer the question they know the student needs answered but does not know to ask. They are also the counselor who will present all the appeal options and coach the student on what they need to provide to do to submit a successful appeal, rather than handing over the appeal form and telling the student that it needs to be turned in by x or y date. This type of counselor is more likely to look outside of the traditional financial aid system for solutions to the challenges their students present them with. Seeking answers through benefits access, social services, and whatever resources they can find to ensure they support their students as well as they possibly can. Contrary to the compliance-minded counselor, advocate counselors seek to find ways to approve appeals within the system they are constrained by. They try to exercise their discretion to the betterment of their students rather than attempting to find ways to say no.

The Advocate counselor is typified by statements like:

“That how they answer the FAFSA determines their EFC. Also, make sure student answered questions correctly and ask if there’s unusual circumstances if EFC is high.”

“I explain that the EFC is what the amount the Department of Education has determined that the family can contribute towards the students educational costs that is based on all the information provided on the FAFSA. Make sure that I explain is not an amount that they pay out of pocket, only that if needed the family could contribute”

“I have the student pull up their total bill with all charges as well as their financial aid awards and we go over total costs vs. total aid eligibility (SIC). We then discuss other options to fill in any gap if needed.”

5.14. Methodological Limitations

The first limitation of these methods is sample size, while six institutions presents a significant sample to manage for this piece of work, in the scheme of the number of financial aid counselors and staff around the country, this is a small N to infer quantitative findings from. However, as a sample to explore qualitative patterns and look for internal comparisons before and after providing trainings to the group studied it provides a sufficiently large sample. Secondly, there is a tradeoff present in providing financial aid staff the ability to remain completely anonymous when completing the surveys. While it is likely to have encouraged more authentic responses (Braun, Clarke, Boulton, Davey, & McEvoy, 2020), this has limited my ability to track individual changes in attitude for the financial aid staff. This issue is mitigated slightly by being able to individually track changes in attitude from project leads but should still be acknowledged.

As already noted, the number of financial aid staff who attended the webinars I created as informational interventions was relatively low, potentially limiting the impact of the webinars as a source of change. It might also be the case that if there is some level of change in attitudes, then it might suggest that small interventions like this can change staff attitudes.

Answering the research questions, I have set out with survey information presents some challenges. The answers to the survey questions are almost certainly shorter than they would have been if a survey methodology had been used. My initial intention had been to supplement the survey data with a set of semi-structured interviews to provide more depth and nuance to the survey data. I had thought that combining the two approaches would provide both breadth and depth to the data. Unfortunately conducting the additional interviews was vetoed by the Principal Investigator for the larger project after I had received initial permission to conduct them from my direct supervisor. This change came relatively late in the setup process for the project and after my dissertation proposal had been approved, making it challenging to adjust my research questions to account for the change. Throughout the project there were clear challenges in combining my own work with that of the larger project, and I recognize that some of those tensions are clear when comparing the research questions to the methods used, I have done my best to overcome those limitations through careful analysis in chapters six and seven, with my findings, and chapter eight for my discussion.

The final limitation I recognize is that drawing conclusions from qualitative analysis of open-ended surveys responses is limiting in general. The data I have is not as rich as it might be had I interviewed the respondents and been able to follow up on their thinking about different issues. In response to this, I have been deliberately cautious in the conclusions I draw and have tried to take additional steps in my qualitative data analysis to avoid over-interpretation. By coding the data twice, with a time gap of a month in between each coding, I hoped to ensure that I was ensuring that any bias I might possess did not overly influence my interpretations. My first coding of the data placed more answers into the indifferent category, possibly out of an innate concern not to commit responses to advocacy or compliance. The second review provided me the opportunity to re-examine the initial coding and adjust where I felt my desire to see financial aid staff in the best light possible might be interfering with accurate coding. I recognize that having been a financial aid advisor myself I might have been inclined to give more benefit of the doubt to financial aid staff. The multiple coding rounds helped me ensure that I was being as faithful to the data as possible. Additionally, I firmly believe that an understanding of how financial aid staff think has been helpful here in avoiding both missing potentially useful information, as well as knowing a lot about standard approaches financial aid staff tend to take.

Chapter 6. Findings-Project leads.¹⁶

This chapter focuses on how project leads responded to the different pieces of the informational intervention they were provided with throughout the course of the project—beginning before the first project meeting and continuing through all of the staff-facing pieces of the project. I focus on the extent to which project leads thinking and approaches to the financial aid issues explored in the project changed. I explain where the project leads appeared to be in terms of advocate, indifferent, or compliance-focused in their attitudes and approach at the outset of the project. I consider to what extent any changes indicate that the project leads were moving towards more of an advocacy-based mindset in their approaches and thinking.

Project leads were all nominated by participating institutions to serve as the primary contact point for their institutions, with two leads per institution. Half (6) of the project leads were financial aid directors or executive directors at their institutions. The other half of the project leads group were senior leaders from various student support roles such as academic advising and student success. Due to the small size of the project leads group I am not providing any demographic information, as doing so might provide identifiable information.

This chapter is based on the analysis of project leads responses to the surveys they were asked to complete before and after they received additional information about negative Expected Family Contribution (EFC), the challenges presented by inaccurate cost of attendance calculations, and the problems that exist in the current EFC formula. In addition, I draw on detailed field notes taken during and after the two project meetings we have held with the project leads. The first meeting was held at the inception of the project in October of 2019. The second meeting was held in December of 2020 to deliver the results of our negative EFC analysis.

For project leads, I had two central research questions to address, with each question broken into subparts. These questions were:

¹⁶ Some sections of this chapter have been adapted from an unpublished internal memo written for the project funder. The sections included have been re-written significantly from the memo.

How well do project leads and financial aid staff understand the limitations of the current federal financial aid system?

- Does improved information about the shortcomings of federal methodology change financial aid staff/project lead's opinions about the adequacy of the financial aid system?
- Does providing detailed information about undercounted financial need change staff/project lead's perceptions about whether their students are adequately supported by financial aid?
- To what extent are project leads 'willing and able' to use better information about financial need to target supports to the students with the greatest financial need?

Do project leads and financial aid staff see themselves primarily as compliance monitors for regulations or as advocates for their students

- How might financial aid culture transition from one of compliance first to one of advocacy?
- Can culture be changed from the top down?
- What changes minds?
- Does information shared at the top of the hierarchy trickle down?

6.1. How we worked with project leads to improve understanding of the limitations in the current system.

A central part of this project was working with project leads to see if we could improve their understanding of the challenges within the current financial aid system and increase their willingness to consider novel ideas and support mechanisms outside of the traditional financial aid system. The first step in this process was holding a half a day in-person project meeting with all project leads, myself, and several research team members. This meeting had three goals.

1. Help explain the overall goals of the project.

2. Explain where the breakdowns in the current system were, with a particular focus on things like the problems with EFC and Cost of Attendance (COA) Calculations.
3. Gauge willingness amongst the project leads to consider negative EFC and support for students outside of the traditional financial aid system.

We met these goals through several different approaches, combining interactive elements with more traditional workshop style presentations with robust question and answer and discussion elements. The human spectogramming exercise explained in my methodology chapter provided the interactive aspect of the meeting. In addition, I completed presentations on the problems present in the current EFC and COA calculations, including why that fed into needing to consider supports for students outside of traditional financial aid. I also shared some information on the extent of unmet financial need among students to show that even before we consider negative EFC, there is significant financial need that is not being met through the financial aid system. A colleague presented how we would calculate negative EFCs for their students and some initial ideas on what the institutions might be able to do with that information.

This initial project meeting helped provide some insight into which of my three typology groups the project leads fell into. The project leads had more compliance-focused mindsets when it came to this work compared to indifference or advocacy-focused approaches. Given the relative seniority of the staff in project lead roles it was perhaps unsurprising that there appeared to be no indifferent type responses, either at the first project meet or on show in the responses to survey one. All of the project leads appeared to be either compliance-focused or advocacy-focused. Interestingly, there was more compliance focus shown from the project leads with a financial aid background than the project leads who did not have financial aid backgrounds.

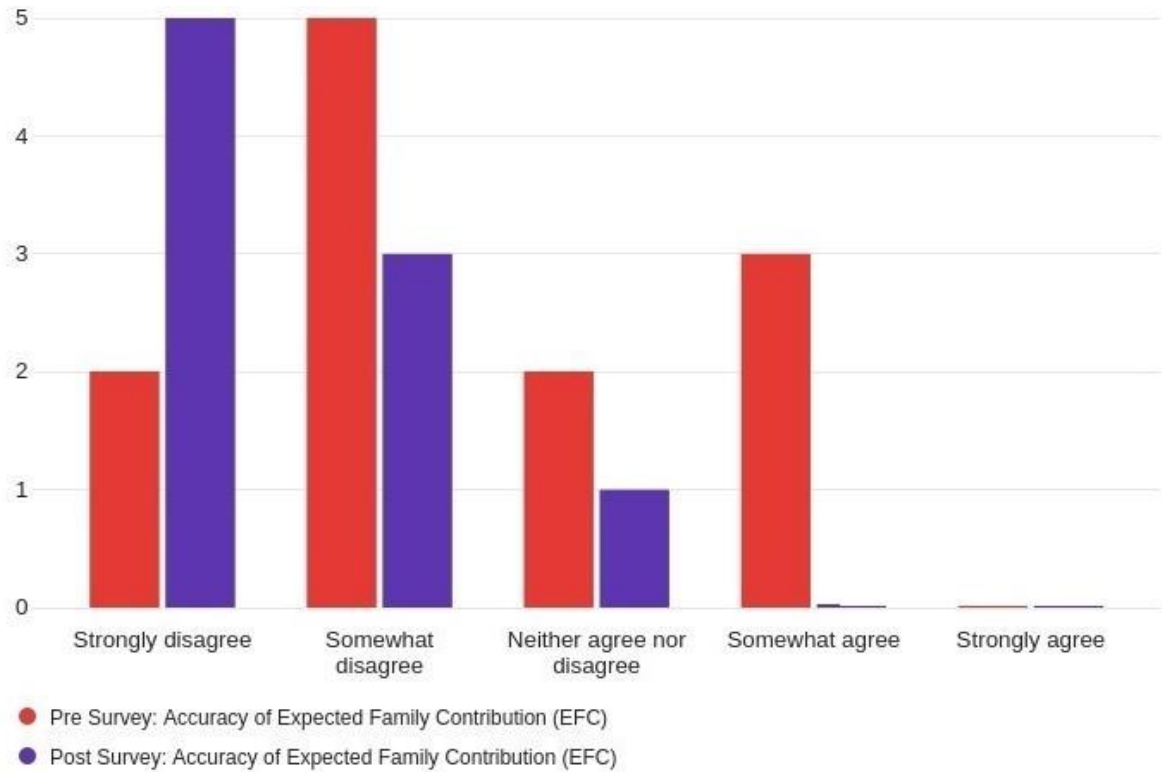
6.2. Limitations of the current system

Before the first project meeting, many institutional leaders had a limited understanding of Federal Methodology (FM) and how its flaws affect students' financial need calculation. Survey responses showed that many of the project leads did not fully understand the problems with FM. This lack of knowledge was more prevalent amongst the project leaders who were not financial aid professionals. However, there were surprising misunderstandings shown by the project leads who were financial aid professionals. While the project leads with financial

aid backgrounds had a good understanding of FM in general, there was quite a limited understanding of how the flaws in the calculations, and financial aid system in general, contributed toward student financial need being undercounted and students receiving poor information about the real price of college. With minimum intervention, the work done to improve project lead's understanding of these issues at the first project meeting appears to have increased their awareness and understanding of the flaws within FM. Comparing the baseline surveys to the post interventions survey, project leaders seem more likely to understand the concepts of demonstrated financial need and negative EFC than they were at the project's outset. They are also more willing to consider the idea that their institution's cost of attendance COA may be inaccurate. The increased information about the inadequacies of the current financial aid system appears to have increased project leads understanding of those inaccuracies and increased their openness to the idea that their institutional calculations of things like COA.

At baseline (Figures 1 and 2), five of the twelve respondents agreed with the statement "Expected Financial Contribution is accurate," and four of twelve agreed with the statement that "Demonstrated Financial Need is accurate." Moreover, none of the twelve respondents could articulate what a negative EFC is and how it is calculated. Negative EFC has been discussed as early as 1991 by researchers (Mortenson, 1991) and was included in bills in congress in 2008 (110th Congress, 2008), so it was surprising that none of the project leads, not even the financial aid professionals, were able to describe negative EFC properly. Given this lack of knowledge, it is perhaps unsurprising that none of the leads expressed a willingness to use the negative EFC to target supports to students.

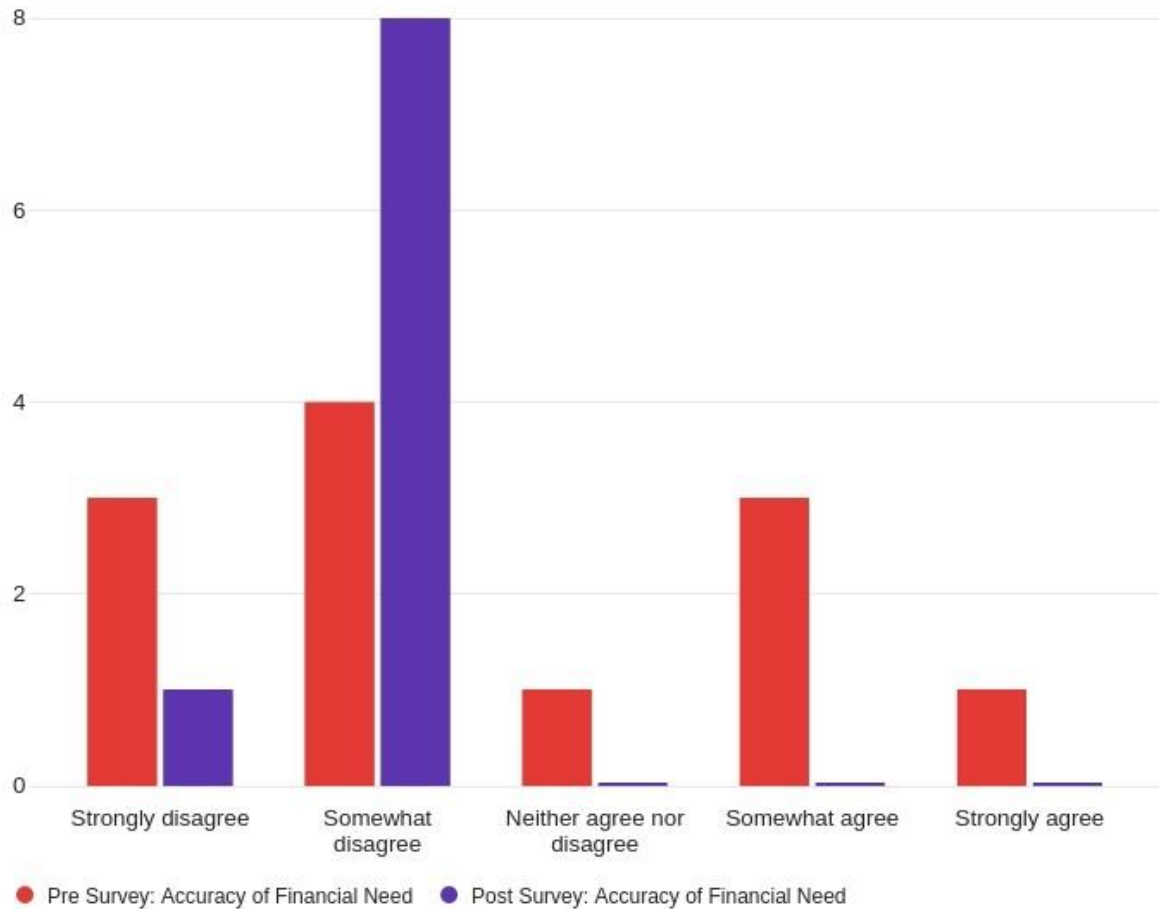
Figure 1. Perception of Accuracy of Expected Family Contribution



Source: Surveys 1 and 2 of Real Price of College institutional project leads.

In addition to the lack of understanding around negative EFC, at baseline, seven of the twelve respondents indicated they at least somewhat agreed with the statement: “My institution’s COA is accurate.” However, only three of the project leads felt they could accurately describe how COA was calculated at their institution. Given that eight of the twelve project leads either had a financial aid background or were currently working in senior roles within financial aid, this was quite surprising.

Figure 2. Perception of Accuracy of Financial Need Calculations



Source: Surveys 1 and 2 of Real Price of College institutional project leads.

The baseline survey results revealed significant variation in what institutional leaders thought demonstrated financial need should measure. For example, project lead five said, “It should measure a household's available income and resources that are able to assist in covering the costs of college.” Project lead six said, “Obviously cost of tuition, fees, books.” These two answers represent quite different perspectives and indicate some serious misunderstandings on the part of senior institutional leaders regarding what is measured when we talk about student financial need.

Across the board, project leaders tended to suggest that the current FM for calculating students’ financial aid need is accurate. Only two of the twelve project leads were open to an understanding of need beyond what FM currently allows, such as the use of negative EFC. This baseline understanding essentially tracks with my initial hypothesis that many people working in colleges and universities, and even many working directly in financial aid, have a limited understanding of the severe flaws within the financial aid system. Given that is it is

very challenging to get people to consider changing practice if they think the current system is relatively accurate, helping the project leads better understand the flaws in the current system was a key part of the initial project work. These baseline answers indicated that more of the project leads held compliance-based mentalities around their work than they did advocacy ones. They were indicative of an understanding that the federal calculations are likely to be correct. Even where there were problems with the federal calculations, those problems were not worth changing or adjusting practice for. The disciplining process of federal regulations has done quite an effective job of keeping those at the delivery end of financial aid feeling that the process is correct. The baseline results also suggest limited willingness to work around the current calculations or find novel solutions to assist students.

As explained in the context setting chapter, demonstrated need controls how much gift aid a student can receive with financial need expressed as the difference between an institution's cost of attendance and the student's Expected Family Contribution (EFC). These calculations are what helps determine how much financial aid a student is eligible for and of what types. It is also true that EFC and COA are poor measures of what a family can afford to pay for college and what college costs. Therefore, it was necessary to measure to what extent project leads felt that these measures were accurate. If they felt the measures were already reasonably accurate, then it would suggest more work to do in explicating the flaws within the current financial system and its underlying methodology.

The current research suggests that many institutions' COA calculations are often inaccurate, as Kelchen, Goldrick-Rab, and Hosch (2017) have shown recently. Their work demonstrated that even when we look at institutions closely geographically located, there is significant variation in the amounts they set for housing and food. The lack of understanding around these issues, from people charged with calculating COA for their institutions, speaks the work to be done helping senior leaders within financial aid understand some of the challenges with the current approaches to calculating COA, as well as work to be done on the part of the higher education research community. This finding also suggests that the Department of Education (ED) mandate that institutions are responsible for calculating COA (Federal Student Aid, 2017) while providing almost no guidance on how to do so effectively is deeply problematic. The lack of knowledge around these issues may also indicate that research on negative EFC and problems with how COA is calculated, both of which have policy and

practice implications, might not be disseminated widely enough to help shape understanding of these topics. Alternatively, of course, this might be an issue of financial aid staff, even senior leaders, not having the time or being incentivized to keep up to date with research on financial aid issues.

6.3. Changes in Understanding for Project Leads

By the time I administered the second survey, institutional leaders had shifted their thinking.¹⁷ They began to demonstrate a more nuanced understanding of demonstrated need and a willingness to suggest that demonstrated need should be considered more broadly than FM currently allows. Eight of the twelve institutional leaders suggested that demonstrated need should be more reflective of “true” college costs rather than broad estimates. None of the respondents agreed with the statement: “Demonstrated financial need and Expected Financial Contribution are accurate.” Statements like these typify this shift in thinking:

Project lead 5

[Demonstrated need is] ...the actual amount of funding that a student has available to attend college. This should reflect the student's actual expenses vs an average allowance. It should also include a more realistic view of the student's costs of attending school.

Project lead 12

This term [demonstrated need] should measure the true and actual gap between student aid and all-inclusive cost of attendance. As we know, family/parent financial information doesn't always tell the full story and may not be an accurate depiction of the students' financial need. My understanding of this has become more nuanced since our kickoff meeting and the many great conversations we had.

At baseline, four of the twelve project leads said they either somewhat or strongly agreed with the above statement that demonstrated need and EFC were accurate. Therefore, these changes

¹⁷ Alternatively, they shifted how they responded to offer socially desirable answers that appeal to the project team leaders (Edwards, 1953; Krumpal, 2013). This is always a possibility.

show a distinct shift in thinking amongst the project leads who demonstrated the most agreement with the idea that current federal calculations are accurate. That some of the responses directly alluded to their change in thinking coming from our initial project meeting provides support for the idea that institutional leaders can be moved into more of an advocacy frame of mind through the types of interventions used in this project. Perhaps as importantly, there seemed to be a shift in attitude towards how the project leads thought about the EFC calculations in general. At baseline, two of the project leads expressed sentiments that suggested that the EFC did an effective job of capturing actual student need, and any issues in terms of affordability were the fault of families if they could not afford college prices after financial aid was awarded. This is typified by statements like this from project lead eight:

The EFC is meant to be an index utilized to calculate how much of the available need-based financial aid can be offered to an applicant. It does not take into account the household's lifestyle.

By the time we administered survey two, project lead eight had changed their response to that same question to “the EFC formula does not account for true costs.” While short, this acceptance of the idea that the EFC formula does not accurately account for what it costs to go to college indicates a change in thinking. The project lead no longer suggested that an inability to pay for college was due to a family's lifestyle choices.

These shifts in responses suggest small moves toward taking a more advocacy-based approach, at least at an understanding level, when it comes to the calculations used to determine financial aid eligibility. It is harder to determine whether these changes in understanding will change how the project leads approach their day-to-day work. Additional data points that I discuss later do suggest that the change in understanding is driving a change in approach.

In the second survey, there were no statements that suggested not being able to afford college was due to family's individual behavior, suggesting some improved understanding of the limitations of the financial aid system. In fact, every written answer to the question “Please briefly explain the reason for your assessment of the accuracy of expected family contribution

(EFC) in the previous question” was more nuanced, longer, suggesting more thought had been given to the answers and showed increased sympathy with the idea that student’s ability to pay for college was poorly captured by the current EFC calculations. This was typified by answers like this from project lead six:

“The family's ability to pay should be considered realistically. Most have not set aside money for college. There are no savings to draw from. Healthcare is high. Transportation and living expenses are high.”

Most of the project leads now seemed willing to consider the idea that the current financial aid system has some very significant flaws and that the formulas used to underpin many of the assumptions made about student and family financial strength are poorly constructed at best.

One of the starting questions here was whether low-cost and light-touch informational interventions could shift thinking amongst financial aid staff and institutional leaders. The changes that my qualitative data shows provide encouraging signs that light touch interventions can shift thinking and possibly even action amongst institutional leaders. These data suggest that the approaches used show promise in shifting institutional leaders towards advocacy-based approaches when it comes to financial aid. Further testing of these approaches using an experimental or quasi-experimental design would be worthwhile to establish if the relationship between the interventions and changes in thinking and understanding are caused by providing additional information and training or not.

6.4. Changes in Perception about student need and willingness to change practice.

A core part of this project was inculcating the idea that student need is undercounted. Partly because the EFC calculations are profoundly flawed and partly because COA is often poorly calculated and rarely recognizes the real cost to students of attending college. This creates artificial homogeneity amongst students with zero EFCs due to the inability to display the negative values that the current calculations can generate. Helping project leads understand how the problems with the formulas was a significant hoped for change in thinking. It seems that this has been achieved with thinking around student need and negative EFC. Knowledge

and understanding of the negative EFC has improved over time and after the interventions that we delivered. This is illustrated by the following comparison between two definitions of negative EFC from the project lead two—one at baseline and one in the second survey.

Survey #1: What is the Negative EFC?

“Students with the absolute greatest need. Families with negative income and assets could create a negative EFC if permitted for reporting purposes from the FAFSA.”

Survey #2, What is the Negative EFC?

“Allowing an Expected Family Contribution (EFC) to report negative numbers in order to identify the neediest students. EFC's stop at 0, although there is the capacity to utilize negative EFC's in the federal methodology calculation if permitted by federal regulation.”

In the second survey, two of the twelve respondents said they were now willing to consider negative EFC in determining how to target support to students when none had been willing to consider this at baseline. Following that, when we delivered our memos on negative EFC to the project leads, many of them indicated surprise at the number of their students who had negative EFCs. For example, the one institution with a negative EFC rate of less than fifty percent was slightly surprised that their rate was not higher. The rest of the institutions in the project were well over fifty percent, over seventy percent at four of the six institutions.

Several different project leads suggested that they would be able to use the negative EFC data to provide various supports or enhanced information to different groups of students to support them better. Project lead 8 indicated that they would be able to use the negative EFC data we provided to help them understand the number of students they needed to connect to public benefits, particularly SNAP. They also explicitly said they would be sharing the data with their frontline financial aid staff to help them understand how much uncounted financial need there was amongst their students. Another project lead¹⁸ indicated they would use the information to provide targeted information to parenting students around public benefits and other supports. Project lead 12 suggested that they could utilize the data to enhance fundraising efforts by their advancement team around emergency aid and other student

¹⁸ Unfortunately, the name of this project lead is missing from my field notes, and I am unable to attach them to a project lead number.

supports. The willingness to use this information to support students was very encouraging. It represented a distinct shift from our first project meeting, where there was a relatively high degree of skepticism around the whole concept of negative EFC. That had changed quite dramatically at this point, with most of the project leads saying they would use the data provided to find ways to support students beyond traditional financial aid supports.

One of the key research questions here was whether project leads would be willing to utilize the data around negative EFC to target supports to students and go beyond traditional financial aid supports. The very positive responses of the project leads to their data indicates that there is a willingness to use such data in creative ways outside of the financial aid system, as well as it helping institutional leaders understand how large the gaps are in the support that students receive. When taken together with other data from the surveys administered to project leads, the willingness to actively engage with and utilize negative EFC data to inform and change practice, expand beyond traditional financial aid supports, and to support fundraising for student supports is very encouraging. It seems that there is both an appetite for improved data around student financial need and a willingness to use it when it is made available. Financial aid may be steeped in a compliance culture, but when data is provided that can be used to take on more advocacy-based approaches without threatening compliance needs too much, there is a willingness to engage with those ideas. It remains to be seen to what extent this willingness will affect ongoing practice at these institutions, even with the initial positive reception. That is an area for further research.

The second key piece of improving understanding of real student need was helping the project leads understand some of the challenges present in calculating COA for students. We appear to have improved the project leads understanding of how COA is calculated at their institutions and in general (Figure 3).

Figure 3. Respondents Assessment of Accuracy of Institutional Cost of Attendance

Q4 - To what extent do you agree that your institution's cost of attendance (COA) accurately reflects your students' non-tuition costs (e.g. housing and meals, transportation, books and supplies, and personal expenses)?



Source: Surveys 1 and 2 of Real Price of College institutional project leads.

At baseline, two project leads were not at all confident in their assessment of how COA was calculated, and only four were very confident in their assessment. At the second survey point, no respondents said they were not at all confident, and seven indicated they were very confident. Given the relatively short period between surveys, it seems likely that this change in understanding stemmed from the information delivered during and after the first project meeting. However, the improved understanding of how COA was calculated does not seem to have translated to the project leads understanding that many students are not receiving accurate COA information.

During the baseline survey, project leads were asked to estimate what percentage of students were receiving completely accurate COA information from their institution. The baseline responses showed that project leads believed a median of 61% of students were receiving accurate COA information. In the second survey, the median had changed to 71%. This increase suggests that the improved understanding of how their institutions calculated COA

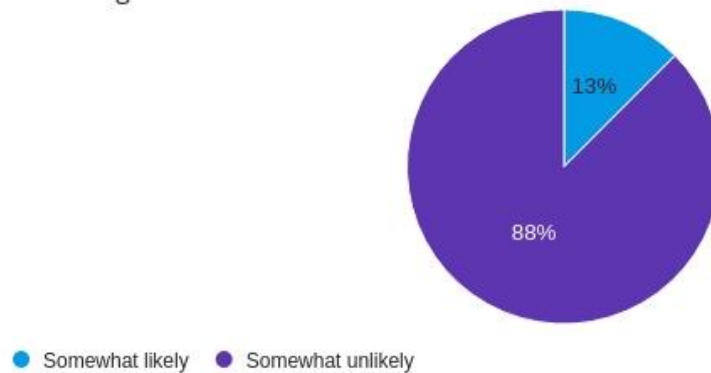
led project leads to believe that they were providing more accurate information to students than they initially believed to be the case. Given that nothing had changed in how the institutions calculated their COAs, it seems likely that improved understanding of the process led the project leads to feel that more students were getting accurate information, even though that is not necessarily the case. It seems that there is more work to be done with helping senior staff understand the challenges present in providing accurate information to students around COA. These results might also indicate that this is simply a particularly complex part of financial aid and that change in thinking requires more time spent delivering improved information to effect change in understanding. Only three respondents at least somewhat agreed their institution's COA was accurate, and seven respondents felt they could explain how COA was calculated.

6.5. Willingness to use better data.

A key question in this work was whether the project leads, and to a certain extent financial aid staff, were willing and able to use new or better data to support students if they were provided with that data and shown how they could then obtain it for themselves. Specifically, I am interested in how the project leads responded to the data we provided them on negative EFC. Questions about the use of negative EFC were added to the third survey we fielded to project leads. These questions were not included in surveys one or two. Project leads had received information about negative EFC earlier in the project. However, I wanted them to have concrete data on what negative EFC looked like for their students before asking how they would use that information. The results were mixed but encouraging.

Figure 4. Likelihood of Sharing Negative EFC information with students.

Q14 - How likely is it that your institution will inform students that their EFC underrepresents how much college will cost them?



Source: Survey 3 of Real Price of College institutional project leads.

Figure 4 shows that the project leads are very unlikely to share negative EFC information with students directly. Almost all the project leads who responded to the third survey did not think they would share that information with students. This is perhaps unsurprising given that there is currently no framework for informing students about this information. There is also the reality that sharing this type of information with students without any additional financial aid funds to support those students might be challenging. Being the prime mover on something novel like negative EFC for heavily tuition-dependent institutions likely feels very risky. There were more encouraging signs in other responses, however.

There is a level of fear that is apparent from the project leads and through financial aid in general that providing students with a more accurate idea of what college will cost will dissuade students from enrolling in college, specifically, from enrolling in their institutions. There are enough instances of institutions lowballing their cost of attendance to make it seem that they are cheaper than other institutions to make this clear (Kelchen, 2019; Kelchen et al., 2017). I have even sat in the room while a former financial aid director of mine explained that we would set the off-campus housing and meals component of our cost of attendance higher than the same component for our on-campus cost of attendance. This was designed to drive students to choose on-campus rather than off-campus housing, which would benefit the institution's budget. It is hard enough to get colleges to provide accurate living cost estimates for students, asking them to also tell students that the formulas behind their financial aid are

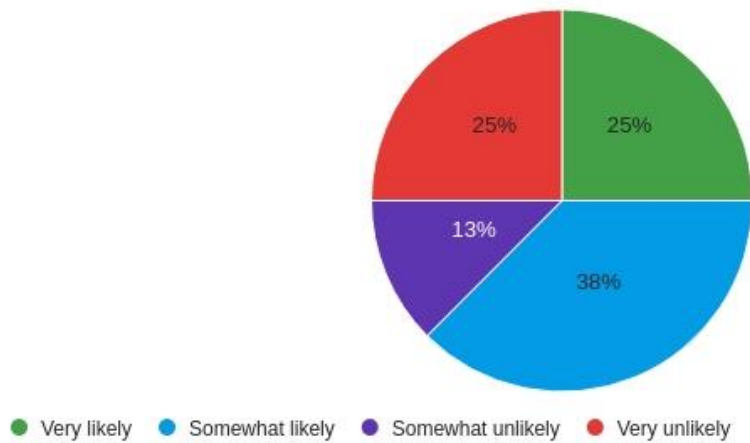
inaccurate might be asking a lot, even if it would better prepare students for the realities they will face once they are enrolled.

This issue is a strange offshoot of the advocacy versus compliance challenge. Institutions are required to provide students with a COA, but they are left to their own devices to determine that amount. As Goldrick-Rab has noted, “We have allowed colleges to decide what it costs to live” (Goldrick-Rab, 2018). Institutions are meeting their compliance requirements in letter but not spirit. I had hoped that more would be willing to take the plunge and share better information with students, even if it is risky. Much of my data points to the fact that compliance beats out advocacy amongst most financial aid staff surveyed, so asking them to go above and beyond their compliance requirements to share student’s negative EFC was perhaps too much to ask.

Although the results were somewhat mixed, project leads were much more likely to say they would share negative EFC information with their frontline staff (figure 5). Five of the project leads said they were somewhat or very likely to share the information with their staff. Three project leads said they were somewhat or very unlikely to do so. This is encouraging from the point of view of a willingness to share challenging information with frontline staff that might help them improve their support of students. It also suggests a willingness to change practice to a more advocacy-focused approach even when using something not part of typical federal financial aid calculations, like negative EFC. These responses also suggest that the changes in understanding the project leads have undergone will hopefully not be contained to only the project leads. That the information provided to project leads will trickle down to their frontline staff at several of the institutions in the project.

Figure 5. Likelihood of sharing negative EFC information with frontline staff.

Q17 - How likely is it that you will share information about your students' negative EFCs with your frontline financial aid staff?



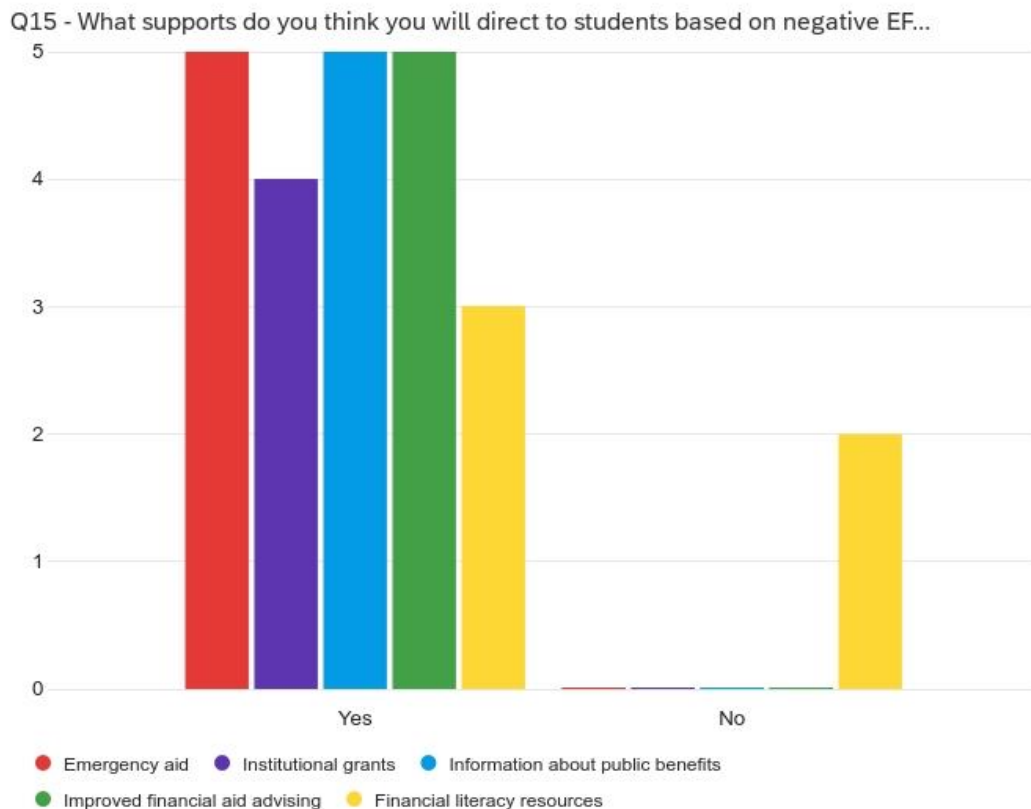
Source: Survey 3 of Real Price of College institutional project leads.

For the project leads who said they were not likely to share this information with their frontline staff, I asked why they would not share that information. One respondent did not answer the question. One respondent noted that they did not have an easy way to pull this information and provide it to staff. We provided all the project leads with instructions on how they or their institutional research offices could calculate negative EFC for students. However, this would likely be a manual process and not part of their standard approach for importing FAFSA data. It is possible that with more training and guidance, the project leads who remained reluctant to share negative EFC data with their frontline staff might be more willing to share such information. This is perhaps the biggest challenge in using negative EFC. Resource-constrained institutions may find it challenging to operationalize the information even if they are willing to do so. The most interesting response came from project lead 14, who said, “they are the institution's experts on EFC and financial aid in general, and I would expect them to be on top of these issues. I don't work in financial aid or with students directly.” In the case of this project lead, it seems that I failed to help them understand that the whole concept of negative EFC was outside of typical financial aid practice. That was a central part of the project, which it seems at least with one project lead, I failed to communicate to them effectively.

6.6. Using Negative EFC to Direct Supports to Students

There is very little point in calculating a negative EFC for students if that information is not used constructively. When it comes to the practical use of negative EFC, the response from project leads was very positive. We asked project leads whether they would use negative EFC to direct any of five different supports to students based on that data (figure 6). The responses were overwhelmingly positive, with a primary focus on using negative EFC to direct emergency aid, information about public benefits, and improved financial aid counseling. This is a clear sign that even if there are challenges in institutions calculating this data for their students, they are willing to utilize it to direct supports to students and it would seem, to improve their practice.

Figure 6. What supports do you think you will direct to students based on negative EFC.



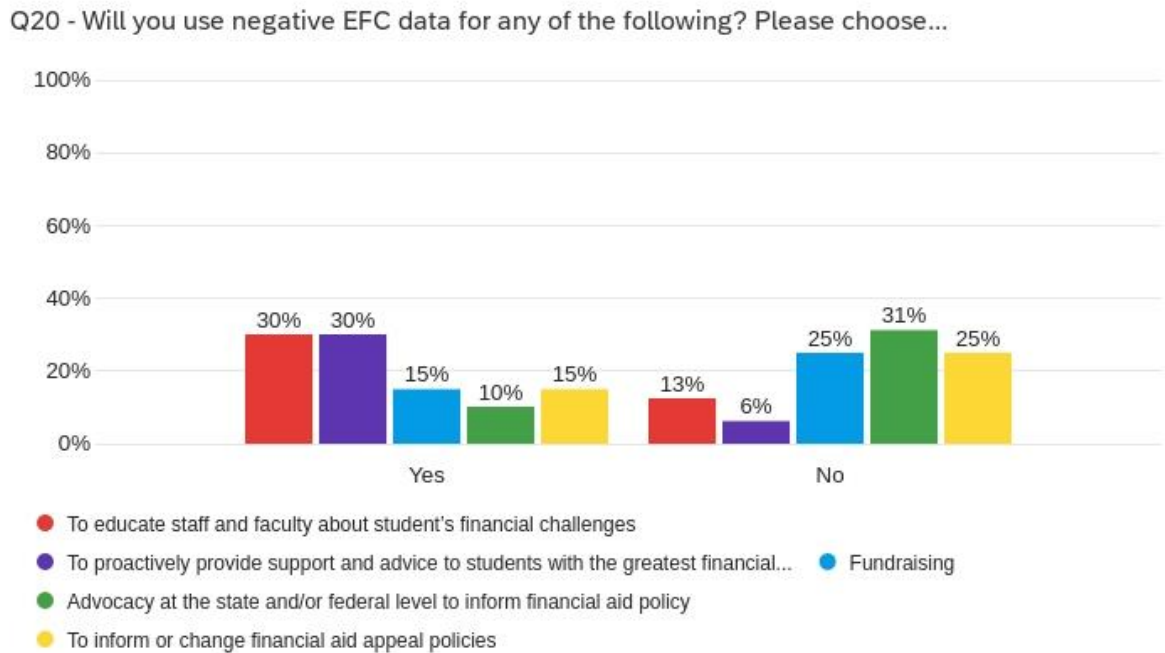
Source: Survey 3 of Real Price of College institutional project leads.

The willingness to use negative EFC data to improve financial aid counseling is encouraging when combined with the number of project leads who were willing to share the information with their frontline financial aid staff. Helping frontline financial aid staff better understand the full extent of student financial need could improve how those staff support students. It might also encourage them to continue thinking beyond typical financial aid supports. As noted in the financial aid staff findings chapter, we saw increased comfort and willingness among staff to direct students to supports beyond financial aid. While beyond the scope of this project, hopefully informing staff about student's negative EFC information, even if only at a macro level, will continue encouraging staff to utilize supports beyond financial aid.

It is a very positive sign that four project leads were willing to consider using negative EFC to direct institutional grants. Negative EFC cannot be used to direct state or federal financial aid funds since it is not a recognized part of the financial aid process at present. However, institutions have sole discretion over how they direct their institutional dollars. If they choose to, institutions can calculate a student's negative EFC and use that number to determine eligibility for institutional grants rather than using their regular EFC. A willingness to use institutional funds in this way demonstrates an endorsement of using better data to support students in a very concrete way.

In addition to asking whether the project leads would use negative EFC data to direct supports to students, we also asked whether they would use negative EFC data for other purposes. These included educating staff and faculty about student financial need, fundraising, changing appeal policies, and advocating for additional funding at the state or federal level. (Figure 7). Thirty percent of the project leads said they would be using the information to educate staff and faculty about student's financial challenges and to proactively provide support to the students with the greatest financial need. Only fifteen percent of project leads said they would consider using negative EFC to change their appeal policies. This suggests the limits of using a novel approach like negative EFC in a very compliance-oriented field. Financial aid administrators have very broad latitude in determining their appeals processes (Federal Student Aid, 2017) but tend to do so in a very compliance-focused fashion. This reflects that the Department of Education is legally prevented from proscribing guidelines for Professional Judgment (PJ) appeals while simultaneously telling institutions that they will be held liable during program audits if they are found to have improperly granted appeals. Or if they have granted appeals with insufficient documentation.

Figure 7. Use of negative EFC for purposes other than student support.



Source: Survey 3 of Real Price of College institutional project leads.

Surprisingly only ten percent of project leads said that they would use this information to fundraise or for advocacy at the state or federal level. This data clearly shows that students have much more financial need than represented by the current EFC calculation. Using the data to show policy makers and philanthropists that additional funding is needed to adequately support students would make a great deal of sense. There were no questions in the survey to explore why they did not intend to use the data for fundraising purposes, so I cannot ascertain the underlying reasons for this reluctance. During the project meeting where we shared the negative EFC data with each institution, at least two project leads were very emphatic that they wanted to provide this information to their advancement teams to aid in fundraising. It seems other project leads did not share that level of enthusiasm. It is possible that the project leads at other institutions were not as connected to their institution's fundraising teams. Alternatively, we did not do an effective job of explaining how this information could be used to help raise funds for things like emergency aid programs. This could be a topic for further research.

6.7. Recent policy developments

As part of the 2021 Consolidated Appropriations Act (National Association of Student Financial Aid Administrators, 2021), Congress has decided to change how financial aid eligibility is calculated, including changing from an Expected Family Contribution to a newly labelled Student Aid Index (SAI). This change is accompanied by a significant change in the formula used to determine the SAI and allowing for the SAI to be calculated as a negative of up to \$1500. This sets up a framework where students could be awarded aid in excess of their cost of attendance and officially recognizes that the current zero EFC calculation does a poor job of determining which students have the greatest financial need.

These changes in the law will not go into effect until the 2023-2024 academic year. They also happened too late to ask project leads about the changes in the surveys we fielded to them. However, it is important to note that federal policy is shifting to acknowledge some of the issues raised in this project. I would argue that \$1,500 is not a large enough negative. It is a start though. Hopefully, this project will have prepared the project leads to better utilize the new information they will receive with a negative SAI.

6.8. Conclusions

The key findings from my data suggest that project leads are, at heart, doing as much as they can to focus on supporting students. It is also clear that when better information is available to them, many project leads are willing to use whatever additional information and tools available to find new ways to support students, even if it is only in the form of improved information and comes with no additional funds to provide to students. There is also a greater willingness to provide tools and information to frontline staff more than directly to students. It is also evident that compliance issues play a significant role in disincentivizing project leads from being creative and using new tools and information unless ED explicitly sanctions them.

The overall sense that comes across when reviewing the qualitative and quantitative data from the project leads survey the project leads are deeply committed to supporting their students to the best of their and their institution's abilities. There are places where the project leads see their role as needing to be more compliance-focused, but they still see themselves as supporting students even when taking a compliance-based approach. It is also clear that there are deep-seated concerns with ensuring they remain in compliance with federal regulations

when it comes to financial aid. No one wants to get into trouble and lose access to federal financial aid for their students.

This tension of advocacy versus compliance directly links to my argument that financial aid staff and many institutional leaders have been disciplined into pushing aside a student advocacy first approach due to the threat of federal sanctions should they end up out of compliance. This was summed up nicely by one of the project leads. When it was suggested that the negative EFC data could be used to inform professional judgement decisions, she said she thought it likely they would get into trouble with the Department of Education if they used something that was not officially sanctioned to inform appeal decisions for students.

Even with the evident tension of balancing compliance with advocacy, there is a willingness to use new and better data to inform practice and train staff. Not all project leads were willing to share negative EFC data with their staff, but those who were were inclined to use it to train staff, inform their use of institutional funds, and in some cases utilize the data to fundraise. All of these are positive indicators that the provision of better data and the informational interventions included in the project are creating some change in how the project leads go about their work.

These evident challenges of compliance versus advocacy speak to the “impossible situations” that Zacka (2017) raises. SLBs operate with so many competing priorities that ensuring every constituency is satisfied is challenging, often cognitively dissonant, and sometimes impossible. I explore this theme in detail in chapter seven. It is even arguable that ensuring compliance is in itself a piece of cloaked advocacy for students. Without access to federal financial aid, most higher education institutions in the U.S. would cease to operate. By ensuring that regulations are met, financial aid SLBs ensure that their students continue to have the funds needed to complete their educations. However, when the need for compliance comes at the expense of students, change needs to be created. It appears that such change is possible through the creative use of data and the realization that there are supports that exist outside of traditional financial aid that students can be pushed toward.

Chapter 7. Findings-Financial aid Staff

7.1. Framing

A central feature of this work was determining whether financial aid staff understand the limitations present in the financial aid system as currently constructed and to what extent light touch informational interventions might change or improve that understanding. In this section, I continue to use my advocacy/compliance/indifferent typology to assess to what extent financial aid staff started out thinking about the issues in question in a compliance or indifferent focus and whether the intervention work done has changed any of those understandings. Other key questions I address are how comfortable financial aid staff are when referring students to supports outside of the traditional financial aid system. Comfort with and willingness to refer to non-tuition supports is likely to indicate some level of advocacy-minded approach given that the use of them usually falls outside of financial aid staff's primary job description.

Everything in this chapter is written with an understanding that financial aid staff frequently face competing priorities in how they are meant to operate, as is so common for Street-level Bureaucrats (SLBs). There are clearly places where staff are endeavoring to provide the best support to students possible. There is also clear evidence that many staff have not been given the training and knowledge to do that effectively. Some of this might be due to institutional context, for example, it would make sense for financial aid staff at community colleges to have fewer resources and less time and money devoted to professional development than staff at four-year institutions. More support and training of financial aid staff is needed to ensure that they can support students effectively.

7.2. Understanding of limitations within the financial aid system

I tested the understanding of limitations with the financial aid system through the surveys administered to financial aid staff through several different questions in each survey.

These questions were as follows:

1. How do you explain to a student how Expected Family Contribution (EFC) helps determine a student's financial aid package?
2. How do you explain your institution's Cost of Attendance (COA)?
3. How do you explain to a student with a \$0 EFC that their financial aid will not cover their full costs?
4. Can you manually calculate a student's EFC using only the EFC tables on the Information for Aid Professionals (IFAP) website?

These questions were all selected because they contain key indicators showing whether a financial aid staff member has a working understanding of everything that goes into determining a student's financial aid package. They also provide indicators on how financial staff would explain some of the more challenging issues and concepts to students. EFC is often misunderstood by students and families, as work by various researchers has shown (Hallett, 2008; Rosa, 2006; Siegel Bernard, 2019). EFC is often confusing because it suggests that it is all the student will be required to pay for college, especially for students with zero EFCs. The two questions about explaining EFC to students thus help show how well the financial aid staff person can articulate and explain how EFC really works and how they can help a student understand why they would have out-of-pocket costs even when they have a zero EFC.

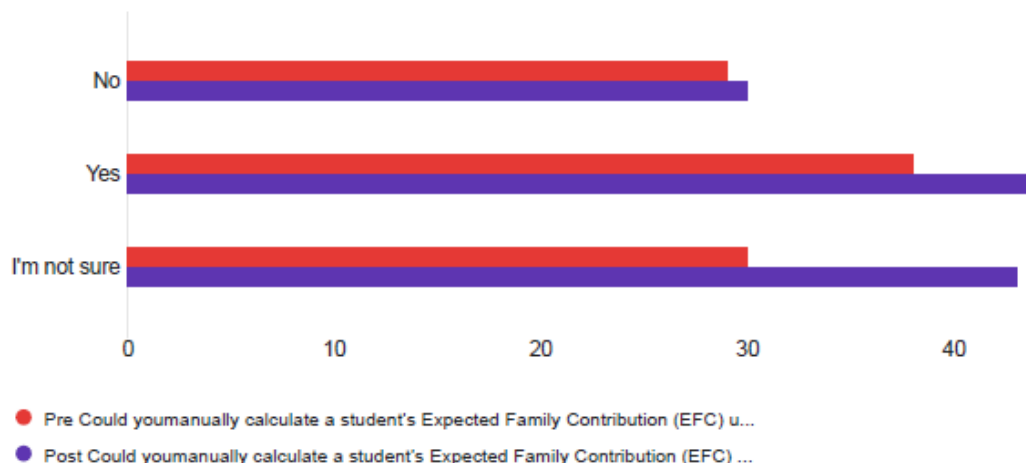
The question about COA is included because of the evidence that COAs are often inaccurate (Kelchen et al., 2017) and do not include costs that many students have, such as childcare (Reichlin Cruse et al., 2019). Being able to properly explain COA, including providing an understanding to students of what is and is not included, provides a useful indication of whether the financial aid staff person has a good grasp on COA and all its implications for the students they support. Finally, as discussed in my context chapter, many of the current financial aid system problems stem from a grossly outdated formula that assumes completely inaccurate living cost calculations. Calculating an EFC manually requires understanding all the underlying formulas and the flaws that exist in the tables used to make the calculations. While not a perfect proxy, knowing whether a staff person can manually calculate an EFC helps provide some indication of their knowledge level around the flaws in the system. Additionally, the ability to calculate EFC will help financial aid staff understand how a negative EFC can be calculated since the method is the same, except for allowing the negatives to generate, rather than ignoring them. This understanding might make it more

likely that a staff person would be more willing to consider using something like negative EFC.

At baseline, the responses from staff about whether they could calculate an EFC manually were evenly split (figure 8). Thirty-eight staff said they could calculate an EFC manually, 29 said they could not, and 30 said they were not sure. In the second survey, slightly more staff indicated they could calculate an EFC manually, as well as an increase in staff who were unsure if they could do so or not.

Figure 8. Ability to manually calculate Expected Family Contribution

Q1 - Could you manually calculate a student's Expected Family Contribution (EFC) using only the EFC formula worksheets from the Information for Financial Aid Professionals site (IFAP) with no other assistance?



Source: Real Price of College Financial Aid Staff Surveys 1 and 2.

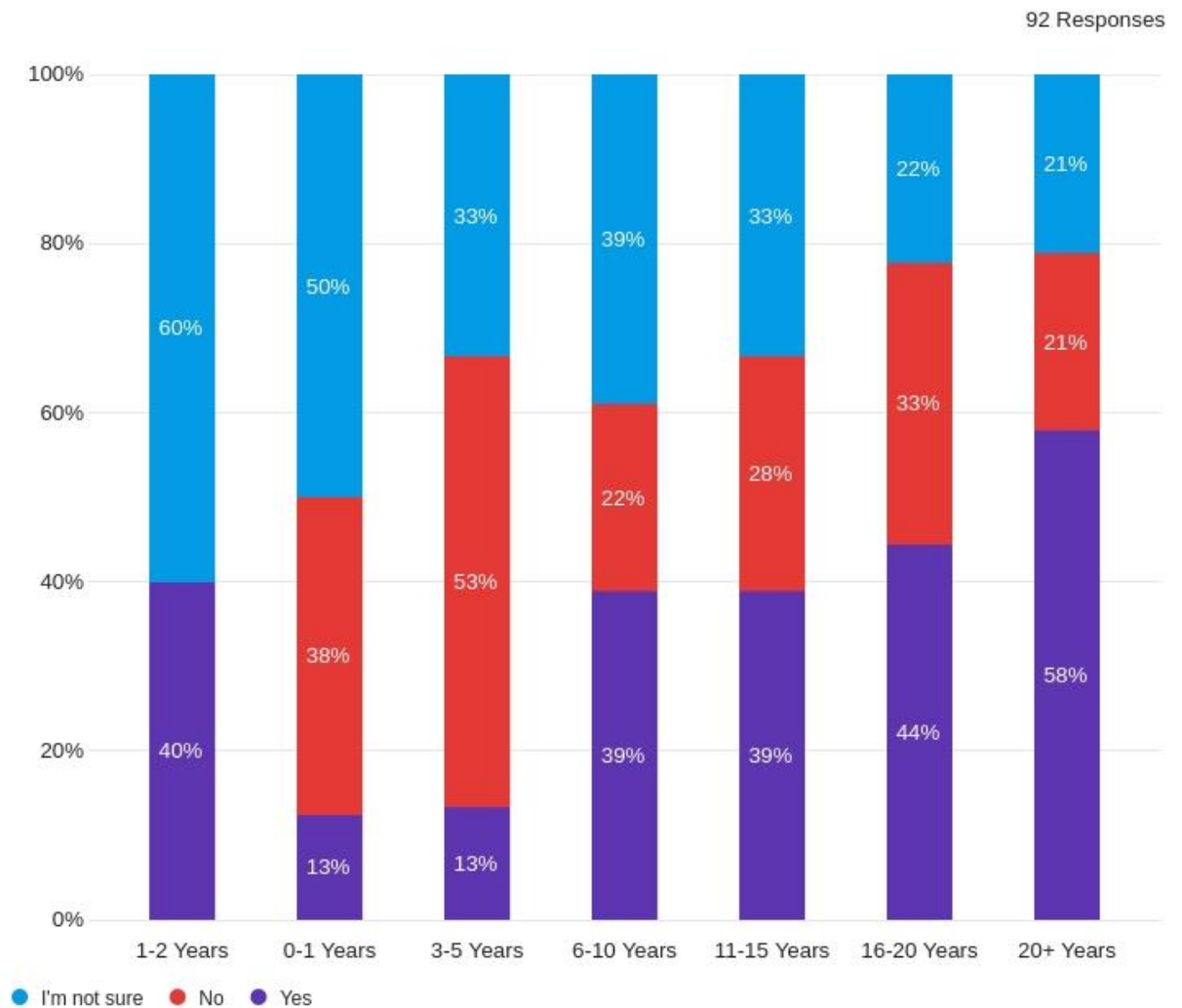
Given that the increase in both yes and unsure responses almost exactly matches the increase in N from survey one to survey two, it seems likely that most of these changes were the result of staff taking survey two who had not taken survey one. This question was included to gauge understanding of EFC and its challenges in general. None of the information we provided to staff focused on improving knowledge of calculating EFC, so I did not expect an overall change in understanding.

This data shows that the majority of financial aid staff surveyed do not have a firm enough grasp of the financial aid formulas to calculate an EFC confidently. This likely limits their

ability to understand student perspectives about struggling to afford the price of college. It also means they are less likely to see flaws in the system since many of those flaws are buried in the formulas that underpin EFC calculations. In addition, there were notable differences in length of professional experience and ability to calculate negative EFC manually. Staff with more years of experience working in financial aid were much more likely to know how to calculate an EFC manually. Staff with twenty years' experience or more were much more likely to be able to do this than staff with less than five years' experience (figure 9).

Figure 9. Ability to manually calculate Expected Family Contribution

Q1 - Could you manually calculate a student's Expected Family Contribution (EFC) using only the EFC formula worksheets from the Information for Financial Aid Professionals site (IFAP) with no other assistance?



Source: Real Price of College Financial Aid Staff Surveys 1 and 2.

Figure note: Ns by years of experience were 0-1, n=9. 1-2, n=8. 3-5, n=12. 6-10, n=21. 11-15, n=19. 16-20, n=8. 20+, n=19

Most financial aid offices have not taught staff how to conduct manual calculations during onboarding in many years, so this is perhaps unsurprising. This difference in length of experience does raise some interesting questions though. My initial thoughts about length of service were that younger, less experienced staff would be more likely to have an advocacy mindset, thinking it was part of their job to go beyond traditional financial aid to support students. Younger staff are also much more likely to have personally dealt with the challenges of the financial aid system in a way that older staff are less likely to have experienced due to accelerating disinvestment in higher education over the last twenty years (Laderman, 2017). However, this data, combined with the answers to questions around whether it was staff's job to know about non-tuition supports, indicate that older, more experienced staff may be the most likely to see themselves as having an advocacy-based role. Much more so than younger staff. It is possible that with experience comes increased professional security and thus an increased willingness to take on more of an advocacy role for students. I explore this more in the next section of this chapter.

By trying to understand how staff explained the challenges in the financial aid system to their students, I was able to tease out how staff thought about these issues or whether they even considered them to be a problem. Analyzing the responses to the open-ended survey questions also allowed me to sort responses into my three-part typology. When it came to explaining to students with zero EFCs why their financial aid package would not cover all of their college costs, it was evident that the financial aid staff who took an advocacy first approach to these issues were in the minority. In the first survey, 18 respondents provided an answer that suggested an advocacy-based approach. Advocacy-based approaches are typified by staff who indicated they took time to thoroughly explain things and ensure that the student had as much information as possible. This response was one of the most thorough.

“If the student did not qualify for any Pell grant whatsoever then I state that it was based on the info they provided on the application. Then I double-check for common mistakes, such as a student placing their parent info on their section as well. Afterwards I either notice a mistake, or advise them to double-check that

their info was accurate through their SAR report if they input info manually. If everything looks good and the student says everything is accurate, then I offer to tell them about the process to get federal loans. Then offer payment plans and such in the meantime if they do not wish to do those, or the loans won't come in on time. If they are a 0 EFC student that didn't get everything covered due to being out of state tuition, or registering for a lot of classes, then I just advise them to look into it and possibly reconsider taking a lot of classes or to speak to admissions in case their residency status is incorrect.”

However, there were far more responses (twenty-seven total in survey one) that suggested a compliance-based mindset. These explanations were limited to responses like this: “Based on calculations made by the department of education, student will have to cover tuition and fees out of pocket of student loans.” Or this: “Based on tax information that student input, not eligible and the student will have to make other payment arrangements for the remaining balance.” These answers indicate minimal engagement with the idea that there might be any flaws in the calculations or that students might need additional information to figure out how they are going to pay for expenses that are not covered by financial aid. While the first, more advocacy-based answer was far from perfect, it does show engagement with the idea that the student is likely to need more help in figuring out how they are going to pay for their college expenses.

Perhaps unsurprisingly, the largest response category was answers coded as indifferent, with thirty-four such responses in the first survey. These answers were always short and showed little or no engagement with either a compliance-based or advocacy-based approach. For example, “Here at EPCC 0, EFC does cover all their tuition costs.” Or, “We rarely have this instance.” These answers exemplified a high level of indifference to both students’ challenges paying for college, or with the reality of unmet financial need. The first answer shows indifference to costs beyond tuition, which are officially considered to be college costs. The second answer suggests the same indifference and a lack of understanding of the reality of college costs for students, given the clear evidence that most students have significant unmet financial need (Baum et al., 2019; Baum et al., 2017; Walizer, 2018). I was hopeful that the work we did to improve understanding of these issues that was relatively successful with the

project leads would show similar success at the staff level. Unfortunately, that was not the case.

In the second survey, there were only nine responses coded as advocacy approaches, a fifty percent reduction. There was a slight decrease in the number of compliance coded responses, but only a decrease of three. The significant change was a large increase in responses coded as indifferent, which rose from thirty-four to fifty-three. The overall number of responses to open-ended questions only increased by seven, so new respondents who had not completed survey one cannot account for this change. There are two possible explanations for these changes. The first is that staff do not only approach their work from one of the three ideal types I have laid out. It is quite likely that staff move from one approach to another depending on a variety of factors. This is supported by Zacka's (2017, p. 128) work using a similar typology to show that Street-level Bureaucrats like financial aid staff constantly have to negotiate shifting shades of grey in their work. The need to negotiate these shifting sands might change how a staff member approaches their work on a day-by-day basis. It is also quite likely that workload, external stress factors, and even day of the week might change how staff approach their work. Research in other fields has shown that whether someone with decision-making power has had lunch or not (Danziger, Levav, & Avnaim-Pesso, 2011) can change appeal decisions. It seems likely that all these considerations could play a role in which of the three approaches someone is operating in at any given time.

The second explanation for the significant increase in indifference responses is that staff who had put more effort into their responses to the survey the first time did not wish to put as much effort into explaining how they work a second time, and as a result, did not provide answers as thorough as in the first survey. This might be a limitation of my methodological approach.

Given that in some areas, it does look like we were able to improve staff understanding of non-financial aid supports to students and increase comfort in referring them to those services, the lack of change and even backward progress shown in the open-ended responses does suggest it is harder to change how financial aid staff explain things that are core to their roles as SLBs. Emergency aid and referring students to public benefits are not core parts of most financial aid staff time, nor are they likely to spend significant time talking to students about them. It is possible that they are more willing to change their approach in these areas, given

the low cost it would require to do so. It is even possible that for some staff, they were learning about emergency aid and public benefits for the first time, which would not be the case with these core pieces of their roles in financial aid.

Spending more time explaining things to students does have a significant cost to a staff member who spends most of their working day on student interactions, so spending more time per student would require a more significant change in approach that might be harder to inculcate. This challenge might also speak to information flow. We spent much more time discussing the challenges around EFC calculations with the project leads. If, as seems likely, only a small amount of that information is then passed on to frontline staff, it is not very likely that the changes in attitudes displayed by the project leads will be as pronounced with financial aid staff.

Responses to the question “How do you explain to a student how EFC helps determine a student’s financial aid package”? Show the most compliance-based responses of the three opened ended questions. Thirty-four respondents had compliance-based answers in the first survey and thirty-three in the second. This is perhaps not surprising, given that this is an area where federal regulations are the least flexible and staff might feel least able to provide students with information other than official explanations. Crucially, many of the compliance-based answers alluded to EFC as the amount a student or family should or was able to pay for their college expenses. These answers showed little or no awareness of any challenges that might exist in the EFC calculations. These sorts of responses included answers like “the EFC is what the FAFSA has determined the family can contribute to the student's education. That is the determining factor for eligibility for federal and state aid.” And “is a measure of your family's financial strength and is calculated according to a formula established by law.” Neither of these explanations is wrong per se. They do fail to fully engage with important context around EFC or acknowledge the reality that many families cannot contribute what FAFSA suggests they can. These types of answers also fail to recognize that many students pay much more out of pocket for college costs than their EFC. When the compliance-based responses are compared to some of the more advocacy-based answers, the difference in approaches becomes clear.

We explain that the EFC is a number determined by the Department of Education, which tells us what you family might be expected to pay for your education. We

explain that the Cost of Attendance components minus the EFC will give us a student's need. That number is helpful in awarding need-based aid.

This answer suggests more engagement with the challenges around EFC, including qualifiers like “might” and showing more effort going into helping the student understand what is being discussed. Similarly, this next response used “theoretically” to indicate an understanding that, in reality, the EFC is not the same as the amount the student will have to pay out of pocket for their college costs.

Typically, when advising students regarding EFC, we explain it is a theoretical number determined by the completion of the FAFSA, but not an indication of what must be paid out of pocket that is subtracted from the Cost of Attendance to determine remaining financial need for awarding purposes.

As with the question focused on explaining why their financial aid package would not cover all costs when they have a zero EFC, these responses showed a relatively low number of advocacy-based responses. In this case, the number of advocacy-based responses increased from survey one to survey two, going from nine to fifteen. Given the small change and the increase in N from seventy-seven to eighty-seven, I am cautious about attributing the change to the informational interventions. This again suggests that changing how financial aid staff engage with and explain these concepts is more complex than providing limited informational interventions. It is also likely this is representative of the small number of people who attended the trainings that we provided.

Explanations of Cost of Attendance were where there was evidence of the most significant effort made to take an advocacy approach, with eighteen respondents in survey one and fifteen in survey two providing answers that suggested an advocacy mindset. However, this question also had multiple answers that were factually wrong. For the other two open-ended questions between survey one and survey two, there were only one or two factually wrong responses. For this question, there were eleven. Aside from everything else in this project, this suggests that even full-time financial aid staff are not very confident in properly explaining what COA is, how it is calculated, and what it is meant to represent.

The advocacy-based responses showed a fairly good understanding of some of the challenges and misunderstandings that exist when explaining COA to students. This response shows a staff member taking a proactive approach to explaining COA.

They base cost of attendance on tuition, possibly food, gas, and other charges for the academic year. A lot of people confuse cost of attendance with their tuition total for the semester, so I have them double-check the cost of their tuition and pretty much ignore the cost of attendance since it's a general assumption based on their housing plans and such on the application.

This type of response acknowledges that there is a great deal of “assumption” built into calculating COA and that students often “confuse” their tuition amounts and their total costs. It does fail to cover every piece of the COA but generally takes an approach centered on helping the student understand something that is often confusing. Unfortunately, there are far more compliance-based and indifferent coded responses to this question. The number of poor and incorrect explanations was particularly concerning. Examples such as these represent more than one-third of the compliance and indifferent response types: “the cost that the student more or less is going to have if the student attends 2 years of college”, and “rarely inform the student about cost of attendance but is the total cost expected for a year of college.” Given how vital it is for students to fully understand the cost of attending college, this was perhaps the most troubling set of responses. The first answer says that COA is meant to be what two years of college will cost. In actual fact, COA is an annual figure. The second answer suggests that some frontline staff do not see it as a priority to inform students about what their costs are likely to be.

From these responses, it seems clear that many financial staff are very unsure how to go about adequately explaining COA to students, and that in general, there is limited engagement with the idea that calculating COA is an inexact science. The lack of change in understanding from survey one to survey two also suggests that there is limited trickle-down of information from project leads to financial aid staff about these issues. Given that decisions about how to calculate COA tend to be taken by senior managers in financial aid offices, this is somewhat unsurprising. This also provides something of an

answer to the question of whether information shared with senior managers trickles down to frontline staff. These responses and lack of change seen in both project leads and financial aid staff suggest two things. First, that changing attitudes around COA takes more concerted work than was attempted in this project. Second, there appears to be very limited trickle-down of information from senior leaders to frontline staff, at least over a short time span. While there was limited change in understanding displayed by the project leads where COA was concerned, there was some. Those changes in understanding do not appear to have been passed on to frontline staff at all. Given that frontline staff do most of the explaining of these issues to students finding ways to improve that trickle-down information flow or alternative approaches for shifting staff to more of an advocacy-based approach is vital.

7.3. Comfort and use of non-tuition supports

Most college students accessing supports for non-tuition expenses learn about those supports from staff. Thus, for students in need of campus supports to access them, staff must first be aware and knowledgeable about them. In addition, they also must be comfortable referring students to those supports. We asked financial aid staff and project leads to tell us if their campus had any of ten non-tuition supports identified by a manual review of each college's website. Not all colleges had all ten supports, but each support selected was present at two or more colleges to be included on the list. If the respondent indicated that their campus had a particular support, they were then asked follow-up questions to determine their knowledge of that support and their level of comfort referring students to the support.

I examine those key areas of potential changed knowledge and comfort with regard to leads' and staff awareness and knowledge of six supports:

- enrollment assistance for public benefits access
- free public transit passes
- emergency financial aid
- campus food pantry
- meal vouchers
- subsidized childcare

These six supports were chosen out of the ten original choices as they were the supports that the largest number of respondents indicated knowledge of when surveyed. I considered staff knowledge of these supports before, and after the webinars, we ran on emergency aid and benefits access. These webinars provided detailed information on those two types of non-financial aid support. In addition, the emergency aid webinar provided an overview of some of the problems present in the current financial aid system, such as the challenges with undercounting student need and the problems with calculating COA.

Table 3 describes awareness of supports in each of the two surveys. I start by considering which supports they are most confident that their institution either offers or does not offer. The greatest uncertainty is evident regarding enrollment assistance for public benefits—44% of respondents in both surveys said they were not sure if that was offered to students. Awareness did not change over time, despite the webinars we provided for staff. However, awareness of the other focal webinar topic—emergency aid—did exhibit some change, with respondents becoming more confident in their responses and certain that emergency aid was available as a form of support.

TABLE 3. Staff Awareness of Non-Tuition Supports Offered

Does Your Institution Offer...?	Survey 1	Survey 2
		%
Enrollment Assistance for Public Benefits Access		
Yes	44	37
No	12	19
I'm not sure	44	44
Free Public Transit Passes		
Yes	31	39
No	42	32
I'm not sure	27	29
Gas Cards		
Yes	10	11
No	67	57
I'm not sure	22	32
Free Tax Preparation		
Yes	36	35
No	36	35
I'm not sure	28	30
Free Legal Services		
Yes	21	23
No	46	40
I'm not sure	33	36
Emergency Financial Aid		

Yes	80	85
No	13	10
I'm not sure	7	5
Campus Food Pantry		
Yes	88	86
No	7	5
I'm not sure	6	9
Meal Vouchers		
Yes	34	24
No	39	40
I'm not sure	27	35
Grocery Store Gift Cards		
Yes	7	7
No	61	55
I'm not sure	33	37
Emergency Housing		
Yes	8	7
No	65	54
I'm not sure	27	38
Subsidized Childcare		
Yes	65	48
No	18	19
I'm not sure	17	33

Source: Data are from surveys of financial aid staff (N(Survey 1)= 89, N(Survey 2)= 121), which project leads distributed to all financial aid staff at participating institutions. Respondents only answered these questions if they knew their institution offered this support.

There is also evidence of increasing uncertainty that often accompanies increased awareness of the limitations of one's knowledge. Specifically, between the first and second surveys, some respondents switched from saying "yes" their institution offered free transit passes/meal vouchers/subsidized childcare to instead saying they were "not sure."

The evidence regarding changes in lead and staff knowledge are consistent with the hypothesis that more information can make you aware of both what you know and what you do not know. It is quite possible that simply by asking the questions about these different types of student supports, financial aid staff were more likely to take the time to find out whether their institution offered the support or not and educate themselves on it.

With regard to public benefits access, in the first survey, about 1 in 4 respondents said they were not at all knowledgeable—this decreased to almost 1 in 10 by the second survey, with the level of knowledge increasing to "slight to moderate" (Table 4). In contrast, when considering emergency aid, the percentage of respondents who felt that they were not at all knowledgeable was very low to begin with (less than 1 in 10), with 61% saying they were

“very or extremely knowledgeable.” However, after the webinars, respondents lowered their assessment of their own knowledge, with about 10 percent shifting to call themselves “slightly or moderately knowledgeable.” This suggests that the starting point/ level of initial expertise matters. Given that most emergency aid programs are relatively new and often quite complex, the work we have done to make staff more aware of the programs their institutions run might also be providing staff with a more realistic assessment of their level of knowledge and understanding of those programs.

TABLE 4. Staff Knowledge of Non-Tuition Supports

How Knowledgeable Do You Feel About...?	Survey 1	Survey 2
	%	
Enrollment Assistance for Public Benefits Access		
Not knowledgeable	26	12
Slightly or moderately knowledgeable	66	76
Very or extremely knowledgeable	8	12
Free Public Transit Passes		
Not knowledgeable	14	3
Slightly or moderately knowledgeable	61	67
Very or extremely knowledgeable	25	31
Emergency Financial Aid		
Not knowledgeable	6	4
Slightly or moderately knowledgeable	33	44
Very or extremely knowledgeable	61	53
Campus Food Pantry		
Not knowledgeable	15	14
Slightly or moderately knowledgeable	60	58
Very or extremely knowledgeable	25	28
Meal Vouchers		
Not knowledgeable	28	9
Slightly or moderately knowledgeable	48	48
Very or extremely knowledgeable	24	43
Subsidized Childcare		
Not knowledgeable	13	7
Slightly or moderately knowledgeable	60	59
Very or extremely knowledgeable	27	34

Source: Data are from surveys of financial aid staff (N(Survey 1)= 89, N(Survey 2)= 121), which project leads distributed to all financial aid staff at participating institutions. Respondents only answered these questions if they knew their institution offered this support.

Table 4 Notes. Responses were collapsed from a five-category scale; row titles reflect the categories they were collapsed from. Columns labeled “%” show the percentage of respondents who gave the answer indicated by each row. Cumulative percentages may not add to 100% due to rounding.

I also assessed whether leads and staff were comfortable referring students to the support services and whether our webinars increased that level of comfort. At the project's start, respondents were most uncomfortable referring students to public benefits access, with 24% saying they were not comfortable and 13% saying that they might be comfortable (Table 4). Over time, their discomfort appears to have diminished; by the second survey, just 9% (3 people) said they were uncomfortable. Indeed, at the time of the second survey, there was more lead and staff discomfort with referring students to emergency aid. The increased comfort with referring students to public benefits access suggests a small shift towards more of an advocacy mindset for some of the financial aid staff, possibly because of the additional information and training we provided. However, the decrease in comfort with regard to emergency aid programs does create some challenges for a simple explanation of the change in approach here. Part of this could be a result of public benefits programs not being run by the colleges themselves, so referring students to them requires less knowledge on the part of financial aid staff. They are also not responsible for the funds or benefits used. Conversely, emergency aid programs are often managed or run by financial aid offices, so financial aid staff might feel less comfortable referring students to the programs because they are responsible for those funds. Given the significant limitations in available funds in emergency aid programs (Conroy, Goldrick-Rab, & Welton, 2021; Conroy, Goldrick-Rab, Welton, & Huelsman, 2021; Kienzl, Goldrick-Rab, Conroy, & Welton, 2020), there might be a reluctance to refer students unless they are deemed to be in particularly dire financial need. This is not uncommon with emergency aid programs. There may also be a reluctance to create more work for themselves or close colleagues in comparison to sending students to support services that are outside of the institution.

Two other areas where staff comfort seems to have increased quite significantly are meal voucher programs and subsidized childcare. Neither of these were included in the webinars we provided, so it is interesting to see such a significant jump. Table 5 shows that respondents who said they were comfortable referring students to meal voucher programs went from 66% in survey one to 87% in survey two. For subsidized childcare programs, the increase was from 75% to 84%. One reason for this change might have been that we included some cursory information about the large percentage of students who are parents, over 25% (Reichlin Cruse et al., 2019), in the webinar on emergency aid as part of the context setting. That presentation also included some of the data on food and housing insecurity for college students today,

particularly the results from Hope Center survey work on the topic (Baker-Smith et al., 2021; Broton & Goldrick-Rab, 2018; United States Government Accountability Office, 2018), that show that student parents are more likely to have experienced basic needs insecurity compared to the general student population. Given the limited time spent on these topics, I am cautious in drawing too strong a conclusion. It is possible that the information provided raised awareness of these issues enough to prompt staff to think through whether they felt more comfortable referring students to these services. It is also possible that by shifting staff mentality to a slightly more advocacy-focused approach, that they are more willing to consider referring students to additional support services in general.

TABLE 5. Staff Comfort Referring Students to Non-Tuition Supports

Do you feel comfortable referring students to...?	Survey 1	Survey 2
	%	
Enrollment Assistance for Public Benefits Access		
No	24	9
Maybe	13	24
Yes	63	68
Free Public Transit Passes		
No	4	3
Maybe	21	17
Yes	75	81
Emergency Financial Aid		
No	7	10
Maybe	14	10
Yes	79	79
Campus Food Pantry		
No	11	10
Maybe	19	16
Yes	71	73
Meal Vouchers		
No	17	9
Maybe	17	4
Yes	66	87
Subsidized Childcare		
No	13	5
Maybe	13	11
Yes	75	84

Source: Data are from surveys of financial aid staff (N(Survey 1)= 89, N(Survey 2)= 121), which project leads distributed to all financial aid staff at participating institutions. Respondents only answered these questions if they knew their institution offered this support.

Table 5 Notes: Responses were collapsed from a five-category scale: definitely not, probably not, might or might not, probably yes, definitely yes. 'Definitely not' and 'probably not' are coded as 'no,' 'might or might not' is coded as 'maybe,' and 'probably yes' and 'definitely yes' are coded as 'yes.' Columns labeled “%” show the

percentage of respondents who gave the answer indicated by each row. Cumulative percentages may not add to 100% due to rounding.

An alternative way to assess comfort with a program is to ask leads and staff to problem-solve. We asked them to name the top three resources they typically refer students to when the student has unmet financial need. The most common response was “scholarship search sites,” while emergency aid was the second most common response and referral to public benefits was the third most common (Table 6).

TABLE 6. Staff Ranked List of Top Resources for Non-Tuition Referrals

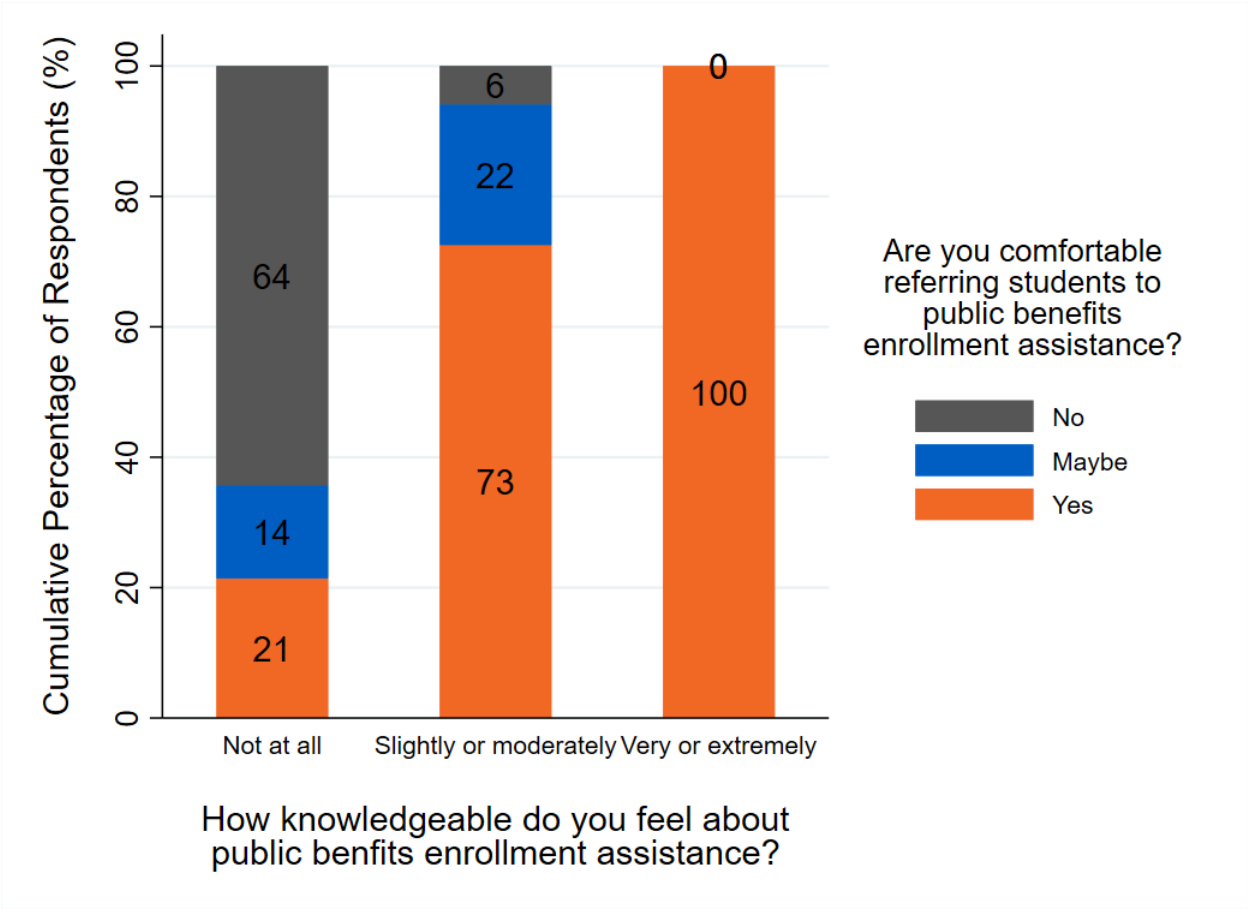
1. Scholarship search sites
2. Information about emergency aid
3. Public benefits programs
4. Financial literacy or budgeting resources
5. Private loan options
6. Other
7. Parent PLUS loan
8. Suggest a student attend part-time
9. Suggest a student consider different living arrangements

Source: Data are from surveys of financial aid staff N (Survey 1)= 89, N (Survey 2)= 121), which project leads distributed to all financial aid staff at participating institutions

Table 6 Notes: Respondents were asked to rank the resources to which they would refer students with unmet financial need, in the order that they would suggest them. To create this list of top resources among all respondents, we counted how many respondents listed a given resource in their personal “top three” and compared counts across resources.

The more knowledgeable leads and staff feel about a program, the more likely they were to feel comfortable referring students to that program, and thus the more likely they seem to be to adopt a more advocacy-minded approach, compared to a compliance-based approach. For example, Figure 10 shows that just 1 in 5 respondents who said they were not knowledgeable about public benefits were comfortable making that referral. But among staff who are least slightly knowledgeable, 73% said they felt comfortable referring students. This supports my hypothesis that light touch trainings can and do move financial aid staff from compliance or indifferent-based approaches to more advocacy-based approaches to working with students.

FIGURE 10. Relationship Between Staff Knowledge and Comfort Making Non-Tuition Referrals, Public Benefits Enrollment Assistance

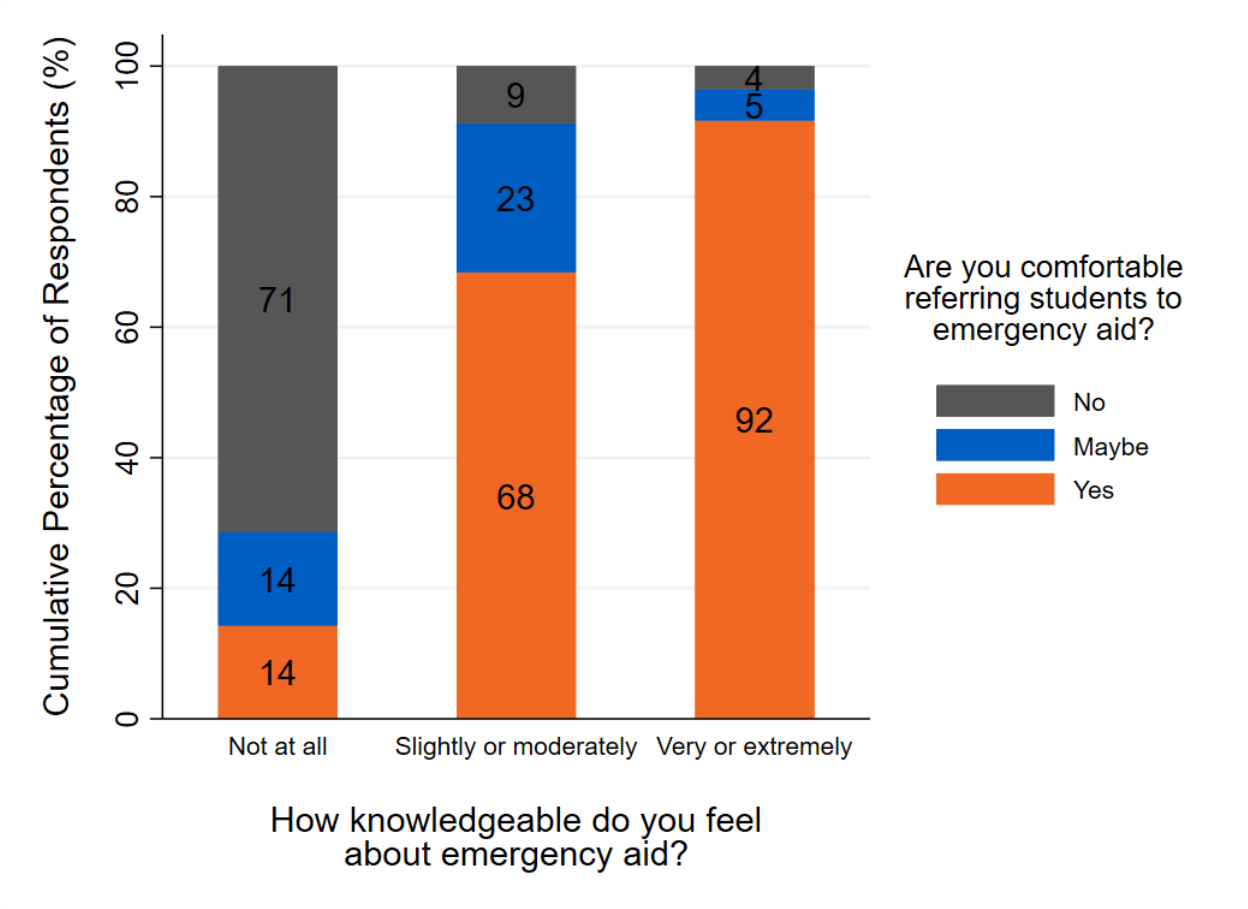


Source: Data are from surveys of financial aid staff (N(Survey 1)= 89, N(Survey 2)= 121), which project leads distributed to all financial aid staff at participating institutions.

Figure 10 Notes: Respondents only answered these questions if they knew their institution offered public benefits enrollment assistance. Responses for both knowledge and comfort making referrals are collapsed from five category scales per the notes in Tables 2 and 3. Cumulative percentages may not add to 100% due to rounding.

Figure 11 shows that staff are generally much more knowledgeable about emergency aid, but increasing their knowledge (e.g. from slightly to very) increases the extent to which they are sure they will refer students to emergency aid.

FIGURE 11. Relationship Between Staff Knowledge and Comfort Making Non-Tuition Referrals, Emergency Aid



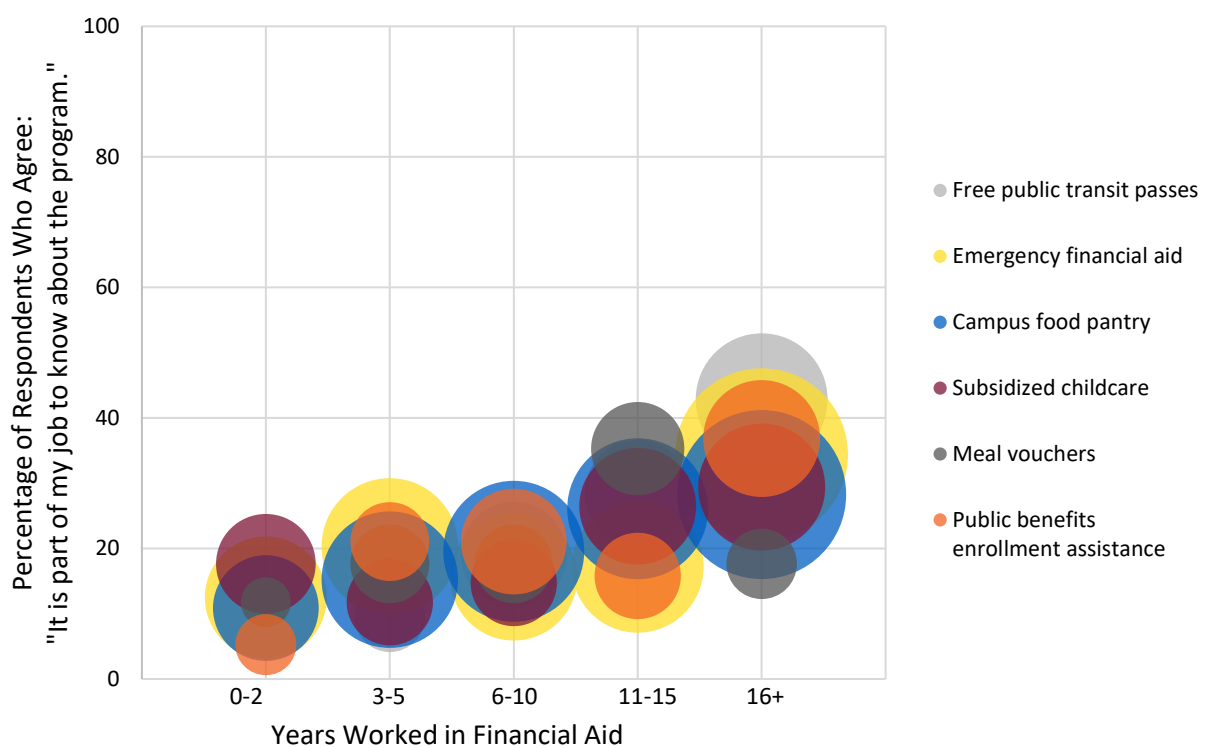
Source: Data are from surveys of financial aid staff (N(Survey 1)= 89, N(Survey 2)= 121), which project leads distributed to all financial aid staff at participating institutions.

Figure 11 Notes: Respondents only answered these questions if they knew their institution offered emergency aid. Responses for both knowledge and comfort making referrals are collapsed from five category scales per the notes in Tables 2 and 3. Cumulative percentages may not add to 100% due to rounding.

Together, these findings suggest there is significant merit in providing financial aid staff with light touch/low-cost training on non-tuition supports. Doing so seems likely to move staff into a more advocacy-based approach to their work. There is also some evidence that staff welcome this information, and as they spend more time working in financial aid, they are more likely seem to take on a more advocacy-based approach. Figure 12 shows that staff with more years of experience in financial aid are more likely to say that it is part of their job to know about these supports. This was a surprising finding in some ways. More experienced senior staff often have greater responsibilities for compliance-related work, especially for

things like federal reporting requirements. I had expected that staff with more years of service might be more compliance-minded rather than less. However, it is also true that staff with more experience have had more time to see where the flaws in the system are and understand that the time spent on compliance often takes away from time spent supporting students. This finding matches my own personal experience in financial aid, where I very much took a “do as you are told” approach in the first years of my career. With increased experience and understanding of the federal financial aid system, I saw where the flaws lay and feel professionally secure enough to push back a little on the system and exercise my own authority when it came to discretionary decisions. More experienced staff may also feel less threat from the push to always meet compliance targets, and over time have become less “docile” in their response to regulations. A better understanding of the regulations in financial aid, that comes with experience may also help staff better understand how and when to exercise the significant discretionary authority that financial aid staff have within the system.

FIGURE 12. Staff Agreement that “It Is Part of My Job” to Know About Non-Tuition Supports, By Years Worked in Financial Aid



Source: Data are from Survey 2 of financial aid staff (N=121), which project leads distributed to all financial aid staff at participating institutions.

Figure 12 Notes: Each circle represents the percentage of respondents within a given range of years worked in financial aid who agreed with the statement in regard to a particular support. Respondents were only presented with the statement (“It is part of my job to know about the program”) for each support if they knew their institution offered that support. Circles are larger for supports with more responses and smaller for supports with fewer responses.

7.4. Conclusions

The key findings emerging from the analysis of my data on financial aid staff are that staff lack sufficient training and knowledge to be able to gauge the accuracy of underlying financial aid formulas fully. It is also clear that years of service matter a great deal; staff with more years of service have a much better grasp of the underlying financial aid formulas than those with fewer years, and thought it was part of their job to know about supports beyond financial aid that they could use to help students. It is also evident that many staff struggle with easily and adequately explaining key financial aid concepts like COA and EFC to students. More staff were likely to rely on compliance-focused answers that provided minimal explanation, compared to those who do their best to take an advocacy approach by trying to fully explain these concepts to students.

Overall, the data from the staff surveys suggest that it is possible to increase staff knowledge and understanding of non-financial aid supports with relatively light touch information and training. However, that is tempered with the fact that improving such knowledge does not appear to have made much difference in whether financial aid staff take an advocacy-based approach to explaining essential financial aid concepts. There is also evidence that information and learning shared with project leads was not very likely to make its way to frontline staff. The data also suggest that length of professional experience matters. Staff who have more years of professional experience seem more inclined to think that knowing about supports for students outside of financial aid is part of their job. Finding ways to translate that same attitude to staff who are earlier in their careers might be highly useful in improving the number of staff willing and able to utilize supports outside of traditional financial aid.

Chapter 8. Discussion

8.1. Introduction

I have suggested that both project leads, and financial aid staff represented in my data are likely to adopt compliance-based approaches to their work. It is also plausible to suggest that this is widely true within the financial aid profession. When my data is added to the responses to NASFAA's (National Association of Student Financial Aid Administrators, 2015; 2020) that indicate compliance requirements are one of the largest time burdens on financial aid offices, it is clear that compliance drives a significant proportion of financial aid work. Recent work by Page and Guzman on the cost of verification also supports this finding. They show that on average, community colleges spend 22% of their financial aid operating budget on verification processes alone. Verification is only one of many compliance-related responsibilities that financial aid offices have, suggesting that an even greater proportion of their total operating budgets and staff time go towards compliance-related work. I have argued that this is at least partly driven by the incentive structure of financial aid regulations that focuses on compliance over advocacy. In the financial aid staff findings chapter, I have also suggested that it might be possible to shift staff and project leads to a more advocacy-based approach. This is possible if they are provided with better information about the flaws in the financial aid system and with additional information on how they can better support students both within that system and in ways adjacent to it. I have shown that it was possible to shift the project leads in their knowledge and perhaps even their actions. I have also demonstrated that it was possible to have financial aid staff consider supports outside of traditional financial aid supports, especially once their comfort with those supports was increased.

This chapter then focuses on how these findings interact with the idea that financial aid staff are both jailer and prisoner, and to what extent they bear responsibility for their prisoner status, how much they may actively play a role in promoting compliance-based approaches and how my theoretical perspective can help find improved approaches for changing such attitudes. I explore the idea that much of the compliance regime in financial aid is performative rather than substantive, and as with many pieces of policy, designed as much to make it hard for poor people to access services as anything else. These restrictions make sense

when thought about as a way to use administrative burden as a rationing mechanism as Herd and Moynihan (2019) suggest is often the case

8.2. Points for Discussion; Knowledge Matters

A key piece of this work was exploring how well project leads and financial aid staff understand the methodology and rules that underpin financial aid, as well as how well they can explain those rules to students. Some of my data was genuinely surprising to me. Project leads understood far less about underlying financial aid methodology than I had expected they would. Limitations in understanding play out in the data when responses show imperfect or even inaccurate explanations being presented to students where things like EFC and COA are being explained by both project leads and staff. This suggests two things, that fundamental understanding of financial aid concepts is not as high among financial aid staff as might be expected, and that when faced with trying to explain complicated concepts and regulations, staff fall back on the explanations provided by the Department of Education. These were the sorts of responses most prevalent in my findings, as discussed in the staff findings chapter. Falling back onto sanctioned responses provides an easy call to authority rather than needing to attempt explanation of the complexity of the financial aid system. This is a fairly natural response to having to manage heavy workloads and the competing priorities that both Zacka (2017) and Lipsky (2010) point to in their work. This also suggests that by providing financial aid staff with an improved understanding of the flaws in financial aid's methodology and ways that they can support students outside of that methodology might move staff toward a more advocacy focus, as I have suggested.

Helping to improve knowledge seems likely to help improve staff's ability to take advocacy approaches for their students. This was evidence by the differences in understanding and approach by years of professional experience, with staff who have longer tenure appearing to be slightly more advocacy focused, possibly because they have a greater understanding of the systems nuances and know when and how to pursue advocacy over compliance, and vice versa. This gels with Zacka's (2017, p. 34) work in discussing the difference between possible approaches for a veteran police officer compared to their rookie. With the veteran knowing when and how to apply the rules loosely or religiously to match the situation. Staff with more professional experience are also more likely to know when to push on regulations and have

the tacit knowledge that Zacka (2017) suggests is key to navigating the complexities of operating as an SLB. It is also possible that institutional resources play a role in these issues. I did not collect information on resource constraints as part of this study, but financial aid offices tend to be under-resourced as data from NASFAA's administrative burden surveys shows (National Association of Financial Aid Administrators, 2020a; National Association of Student Financial Aid Administrators, 2015). Financial aid offices at community colleges are often particularly resource constrained. With four of the six institutions present in this study being community colleges, it is reasonable to think that limited resources for staffing, training and professional development might also hinder staff's ability to approach their work from anything other than a compliance mindset.

8.3. Compliance Versus Advocacy Among Financial Aid Staff

As shown in my financial aid staff findings chapter, my data suggest that financial aid staff are indeed more compliance than advocacy focused. This finding is in contrast with the counselor-type roles and titles that the financial aid profession uses, creating some dissonance. The most likely explanation for this focus on compliance over advocacy is the relentless focus on compliance issues from ED that permeates the entire financial aid system. There are few negative consequences that financial aid staff suffer for focusing on compliance. Indeed the system encourages it. The adherence to compliance may also explain why staff and project leads were initially very reluctant to think out of the box at all. Indeed, even after being provided with more information, some of the project leads were still reluctant to think outside the box when it came to things like using negative EFC.

There was evident fear from some project leads in my final survey responses and during our project meetings that using negative EFC could get them into trouble with ED. This was in spite of the fact that when presenting the negative EFC data, we made it clear we did not suggest using it for the awarding of federal financial aid, instead of providing options for how it could be used in compliance with current regulations. Given my contention that the financial aid regulatory regime leads financial offices to believe they are constantly watched, this is perhaps unsurprising. My theoretical approach would expect such fear, with financial

aid offices reacting to the need to show they are meeting the performative requirements of regulations that stem from such regimes (Ball, 2003, 2015). Additionally, this is a reaction to the idea that they are constantly watched by ED to ensure that they are meeting all compliance requirements. As Foucault (1977) and others such as Hope (2003) suggest is the case.

The compliance focus of senior leaders lends strength to the ideas I have presented already; financial aid staff are inculcated into a heavily compliance-driven professional environment, where the right thing to do often involves disciplining students by ensuring they meet every piece of administrative burden thrown at them. This also continues the process of disciplining staff by ensuring that they must spend more of their time on making sure students have correctly met the administrative burdens set for them rather than having time to support and advocate for students. If senior leaders within financial aid are more likely to be compliance-focused than advocacy-focused, that seems likely to continue a cycle of pushing financial aid staff towards compliance-based approaches at the expense of student advocacy. If it appears clear that the path toward professional growth and promotion is through ensuring compliance, then more staff are likely to adopt that type of approach as they develop in their careers. Thankfully for my hypothesis that financial aid leaders and staff can be shifted in their percepts, these approaches are not universal.

As I note in my finding's chapters, some staff and particularly project leads are willing to use better information to think innovatively to support their students. Finding that there was some willingness to use things like negative EFC from project leads and for financial aid staff to feel more comfortable sending students to public benefits once they knew more about them shows that it is possible to push financial aid staff towards a more advocacy-based approach if they are provided with the right information. This pushes back against the idea that those subjected to the panopticon of regulations become completely "docile" bodies, as both Foucault (1977) would suggest. As Hope (2005) points out in his work on surveillance, one response to constantly being watched is resistance and subversion. Given the large amount of discretion that financial aid staff have, they can operate as the "powerful subjects" that Wang highlights (2011) if they choose to. Financial aid staff can push and pull at the system rather than meeting it with docility. While many financial aid staff respond by adopting a compliance mindset, others in my data show a willingness to consider how they can exercise discretion in ways that support students and push a little at the boundaries of regulation and compliance, it is also interesting that those staff who have worked in the field for longer seem

to be more willing to take on an advocacy mindset. It is possible that with more time and professional experience, as well as having to live under significant compliance requirements, that staff grow more willing to flex their advocacy muscles. This suggests that it is possible to avoid the moral reductivism that Zacka (2017, pp. 106-107) sees SLBs gravitating towards

We can give people discretion to act, but it might be a lot harder to give them the desire to care enough to exercise that discretion. Indeed, this might be unfair, it is not that financial aid staff do not care, it is just hard to care about everything all the time. The administrative burden (Herd & Moynihan, 2019) financial aid professionals face is often just as crushing as that faced by students. When dealing with hundreds if not thousands of student cases year after year, in many cases decade after decade, it is arguable that caring too much would make it impossible to continue to do one's job. Financial aid staff face similar challenges to those facing social workers. Blaug (1995) notes that in the face of rising need for services, frontline workers are often faced with slogging through “an unending gruel of bureaucracy” as the only option for supporting their constituents (p.423). Zacka (2017) suggests that an added risk here is empathy burnout for SLBs that put too much force into their caring and fail to protect themselves.

Ensuring staff do not suffer from any kind of burnout is vital. That being acknowledged, my primary concern here is that caring is disincentivized not because it is a self-protection mechanism but because the incentive structure is such that financial aid staff are actively encouraged to care more about meeting compliance requirements than they are with helping students. This is clear from responses to surveys that showed far more responses that were compliance-driven than indifferent or advocacy-driven. It was also evidence in meetings with project leads where they explicitly said that fear of being in or out of compliance would drive decisions on when and how they used the negative EFC data we had provided them with. This is further supported by the rollout of pandemic emergency aid, which was delayed and complicated by poor and changing guidance from the Department of Education (ED). Over 80% of respondents to a NASFAA (National Association of Student Financial Aid Administrators, 2020) survey on the issue said they were greatly or somewhat concerned about how they would be held accountable. This is supported by Hope Center research (Kienzl et al., 2020), showing that institutions delayed disbursing funds because of concerns over being out of compliance. These compliance demands inevitably create issues of student equity, with students who are most in need facing delays they can ill afford.

8.4. Uneven Exercise of Discretion

When discretion is granted but is fenced around with language that says you must be able to prove categorically that the student is deserving of said discretion, then you are setting up a situation where discretion is exercised unevenly and student's likelihood of having an appeal granted is highly dependent on what institution they attend. This dynamic is clear in the federal student aid handbook sections on professional judgement, where institutions are advised to gather multiple letters of support from third parties to support a student's appeal apart from under exceptional circumstances (Federal Student Aid, 2017). As if a student needing to appeal was not an exceptional circumstance in and of itself. If the institution gives individual counselors discretion, it can be even more granular, with the chances that an appeal is granted based on the counselor the student is assigned to, usually having drawn their lot by accident of last name alone.

The data in my financial aid staff findings chapter certainly suggests that staff are more likely to take on compliance-based approaches when it comes to how they think about explaining complex issues to students. The responses to whether their appeals processes are too complex or not, the area where staff exercise the most discretion, also suggests that staff are not inclined to think that they should be taking more of an advocacy-focused approach when it comes to supporting students who, by dint of needing to appeal, are likely to need the most help. This finding lies somewhat at odds with Lipsky's (2010) ideas around discretion and Street-level Bureaucrats (SLBs). Lipsky generally thinks discretion is good and a key feature of what gives SLBs their status as such. Discretion allows SLBs to manipulate policy to assist their clients. Finding ways to do so without blatantly breaking policy is a key part of operating successfully in the world as an advocacy-focused SLB. Discretion is only good and useful in so much as it is utilized.

If discretion is used as a convenient excuse for not legislating adequate support directly into regulations and the discretion is not regularly utilized to help students, then the discretion merely provides a fig leaf defense for putting compliance before advocacy. Karseth and Møller (2020) speak to these issues in regards to special education, noting that there is a fine balance needed. Too much regulation inhibits professional judgement. Too little can lead to a lack of support for the students who need help. This issue plays out in financial aid, with

institutions choosing to take on institutional policy positions where they explicitly do not even consider appeals. This was recently corrected by Congress (National Association of Student Financial Aid Administrators, 2021). The fact that it had to be legislated that discretion had to be exercised, rather than being something that institutions could choose to exercise if they felt like it, does suggest that in this regard Foucault may be on to something with his rather negative stance on discretion. It is possible to draw some direct lines from the way that Foucault thinks of knowledge and power in *Discipline and Punish* (Foucault, 1977), with how knowledge of prisoners is used to discipline prisoners, and how financial aid disciplines both students and staff. Staff are watched and disciplined for going out of regulatory compliance, while students are watched for mistakes made in their complex financial aid forms and audited for compliance with the rules.

Financial aid staff are an excellent example of the negative consequences of combining power and knowledge. They possess specialized knowledge in an immensely complex field and the sole power to make discretionary judgments. This leaves clients little ability or the required knowledge to advocate for themselves if financial aid staff choose not to advocate on their behalf. This tracks with the SLB and Foucauldian sides of my literature, in spite of the friction that exists between the two streams of thought when it comes to professional knowledge. Vesting so much discretionary power in financial aid staff means that reluctance to exercise it can have serious negative consequences for students. As Zacka notes (2017, p. 34), ‘real discretion can be both wider and narrower than formal discretion.’ Additionally, the vesting of so much discretionary power in individuals makes it harder for students when those individuals choose to take compliance-focused approaches and exercise that discretion in limited ways. This then hinges on whether discretion should be more or less tightly controlled or whether the regulatory incentives need to be changed so that institutions have something to lose by failing to support students rather than what they stand to lose from a poor audit finding.

8.5. Terrors of compliance.

I have referred frequently to Ball and how I see his work intersecting with this in terms of how requirements from the state can make the lives of financial aid staff ever more challenging as they must focus more and more time on compliance issues and less and less

time on advising and directly supporting students. Ball talks about the “terrors of performativity” (Ball, 2003) with specific regard to teachers, with meeting particular metrics and goals taking over from the complex work of actually teaching. Performing the role of a teacher, narrowly defined as meeting particular targets becoming more important than engaging with the complexity and challenges of teaching, I see a similar terror of compliance exhibited with financial aid staff. My data and practitioner experience show fear of stepping outside of regulations and even of fully exercising the discretionary power that has been granted to financial aid offices. There is a fear of constantly being watched for slip-ups by ED, completely matching the feeling of constantly being watched that is so much a feature of Foucault’s work on compliance (Foucault, 1977, 1980) and supported by others such as (Holloway & Brass, 2018) on teachers as well as general administrative burden built up in education generally (Murphy, 2020)

The performativity of many financial aid compliance regulations is key. Research has shown that verification, a huge piece of the financial aid compliance regime, does nothing to change how much aid most students receive (Ahlman et al., 2016; Warick, 2018). In fact, there is good evidence that the process seems to create a negative enrollment effect for the most marginalized students (Debaun, 2018; Lee, Dell, González Canché, Monday, & Klafehn). This entire piece of financial aid compliance and regulation, ostensibly designed to ensure that the right people get the support they need while protecting taxpayer dollars, is administrative burden for the sake of performance so that we can say, “look how well we are guarding these dollars.” More insidious is the reality that placing this level of administrative burden in place rations the program by reducing the number of students receiving support. Herd and Moynihan (2019, p. 39) point this out directly, that “the programs targeted at poor people...tend to have the greatest administrative burdens”. The burdens thus serve two functions. For those who make it through the gauntlet, politicians can point to how they are ensuring that funds are spent wisely and on those who need it most. This compliance theatre, as I noted above, does not really change things for most of the students who make it through the process. The secondary purpose is to limit uptake of the program, so the students who see the process and give up do not draw on funds that they were likely entitled to receive support from.

As noted in my findings chapters, financial aid staff are much more likely to take a compliance-based approach to their work than an advocacy-focused one, and frequently even

more than simply taking an indifferent approach. That by itself is perhaps not enough to show that compliance comes at the expense of advocacy. My data only speaks tangentially to the idea that compliance must take precedence. By factoring in data collected by others, particularly NASFAA, in their Administrative Burden Report (2020a), the suggestion that compliance takes away time that could be spent on advocating and supporting students gains strength. NASFAA's administrative burden reports (National Association of Financial Aid Administrators, 2020a; National Association of Student Financial Aid Administrators, 2015) show that compliance-based work, particularly things like verification takes up more time and resources than any other activity for financial aid offices. Respondents to this survey cite compliance workloads to be one of the primary factors inhibiting more time spent on student support and outreach efforts. This is despite the same survey showing that most financial aid offices have less than two staff labeled as "compliance officers." This seemingly conflicting data speaks to the challenges that financial has even within its own self-conception. We call staff "counselors" or "advisors", suggesting that their primary functions are to support, advise and guide students. However, if compliance work poses one of the biggest challenges in providing more student-facing support, and most financial aid offices only have a couple of staff where that is their primary responsibility, then the conclusion that must be drawn is that most financial aid staff spend a significant portion of their time on compliance activities, to the detriment of being able to focus on advising students. Murphy and Skillen's (2015) work on time is salient here. With finite time, compliance-focused activities that are deemed essential accountability metrics are more likely to be given priority, likely taking time away from advocating for and supporting students. This also challenges the values that financial aid SLBs hold, removing choice in what they believe they should prioritize as professionals.

The other key question here is whether financial aid staff are unwilling victims of compliance requirements imposed on them or if they are complicit in the process. Having spent most of the past decade working in financial aid offices, it has become clear that many staff are, as Foucault might suggest, "Trojan Horses" for an ever-increasing focus on compliance over advocacy. Yes, the negative incentive structure that has been built by the Department of Education weighs heavily on the work of most financial aid offices, but given that many institutions impose their own criteria for financial compliance in addition to those requested by the department of education (Warick, 2018), it is hard to argue that financial aid administrators do not bear some level of responsibility in this process. Indeed, my data from

colleges that do not use things like the CSS profile show that most staff think that the barriers to appeals are just about right, or in some cases, even too easy. Adding this to national data on colleges asking for even more data than FAFSA requires and increasingly the picture that is built is of a profession that on the one hand wishes to claim it is mostly focused on supporting and advocating for students, but where the data and responses from financial aid staff suggest that they are not “docile bodies”(Foucault, 1977), simply acquiescing to a high level of compliance requirements from the state. In fact, they are active in keeping these structures in place to maintain a high level of compliance focus, regardless of whether that impacts students negatively.

The one mitigating factor I might suggest here is a kind of administrative burden Stockholm syndrome, where so many financial aid staff have spent their careers bombarded with the implicit message that their role is to ensure compliance over advocacy that it becomes impossible to break out of that. Every action, even those by where staff are actively trying to support students, is viewed through the compliance first lens. This is similar to Holloway and Brass’ (Holloway & Brass, 2018) finding that newer teachers, who have come up professionally knowing nothing but performative expectations find them to be useful and comforting. I would argue that performative expectations are not wholly bad, as Holloway and Brass and Ball before them (2003) suggest. Performativity has its uses, and in some cases might be beneficial to ensure that SLBs are completing the essential functions of their role. There is a need for balance, however. Doing nothing but meeting goals and targets leads towards the heavily compliance-focused approach that I see in my data and away from supporting more advocacy for students.

My evidence suggests that financial aid staff are likely to appeal to authority and “regulations” when faced with having to explain challenging situations to their students. At first glance, this might indicate that financial aid staff are as docile as Ball might have us believe. Reality may be more nuanced though. There is comfort in performative expectations as Holloway and Brass (2018) seemingly inadvertently reveal in their work suggesting that performativity is ruining teachers. It is much easier as a financial aid counselor to point to the number of files you completed a verification on as a marker of your productivity and “success” than it is to figure out how to enumerate that you spent two hours advising five students on the intricate nuances of how the different pieces of their financial aid package would help cover their college expenses. There is comfort in simplicity. As Zacka (2017)

rightly points out, the SLBs who spend all their time at the advocate end of the typology I use are more likely to burn themselves out than those who find a balanced approach to the work. I have found this as a tension even within my own practice as a financial aid advisor. The parts of the work that I drew the most satisfaction from were when I could spend time one on one with students and families helping them navigate the complexities of the system. When I wanted to advocate for a raise or promotion, I reached for metrics of success that were largely quantifiable and performative. For example, counting how much had our late applicant percentage gone down by due to my communications efforts, and how many files had I processed even though that was not my primary role. Even those who seek to embody the advocacy-focused financial aid counselor find the simplicity of the performative alluring.

8.6. How Differences Between Staff and Leadership Challenge Change Making

This section will touch on the ways that it was easier to move the attitudes and understandings of project leads. The project leads had far more interactions with me and the rest of the research team than their staff. The financial aid staff only received the information that was passed on by the project leads and the information that we provided during the webinars that all financial aid staff were invited to attend. Given the limited interactions, it is notable that there were measurable changes in understanding and comfort with things like emergency aid and public benefits access. In comparison, the project leads seem to have fallen into two extremes. Those who shifted their thinking through the course of the project and those who started out skeptical and remained so, or even further entrenched themselves in their skepticism of the work we were doing. So much so that as the project comes to a close there are some project leads that I cannot even get to respond to emails about the final pieces of data collection still to be completed.

8.6.1. Sharing of information from leaders to staff

I lay out in my findings section that project leads had mixed responses when asked if they would be willing to share the information we provided them on negative EFC with their staff.

The dichotomous response speaks to the debate in the theory around docility. The project leads who were more likely to share the information saw the benefit of providing their staff with additional information. The answers to open-ended survey questions suggested that they saw providing their staff with more and more nuanced information as largely a good thing. For the project leads who were less likely to share the information, the weight of compliance mandates and their more docile acquiescence to them is evident. Those project leads pointed to there not being a place in federal regulation for the use of negative EFC and a worry that they could find themselves in trouble during an audit if their staff has used negative EFC information as part of determining whether to grant an appeal.

The results here are that it is clearly possible to encourage the use of more nuanced information, but that adoption of such will be uneven depending on the willingness of senior leaders to work around the compliance regime of federal financial aid regulation. Ultimately, while this sort of work can clearly yield benefits, some, more compliance-driven leaders, are unlikely to change their approach unless regulations specifically say they can. This tension suggests that the discretionary aspect of SLB work and the discretion built into financial aid regulations is only useful so long as financial aid leadership feels they can defend discretionary choices in reference to the regulations.

These findings indicate that moving the understandings and approaches of financial aid staff is likely only possible to the extent that leadership within a financial aid office is willing to push the edges of what they see as their discretionary authority. I see this in the data discussed in the findings section and in my personal experience, where it takes a willingness to change from leaders to inculcate change within staff. This runs somewhat contrary to Lipsky's (2010) belief in relatively unfettered practitioner autonomy. Zacka's (2017, p. 200) more nuanced approach here is perhaps more useful, suggesting that it is quite understandable that SLBs might become indifferent or compliance-driven in the face of constantly competing priorities. This also suggests that while frontline SLBs have some degree of discretion, that discretion still lives within strictures dictated by management-level staff, who must be brought on board for changes to permeate thoroughly.

8.7. Professional Experience matters in how staff approach their work.

An area of surprise in the data was finding that financial aid staff with more years of professional experience were more likely to think that the requirements they had in place for discretionary decisions, like appeals, were harder than they should be. My initial hypothesis had been that older financial aid staff were more likely to have a compliance focus in this area compared to younger, less experienced staff. This would be, I expected to find, due to older staff having spent more time working under a compliance-focused regime than younger staff. I also thought it might be due to younger staff having been more likely to experience the challenges of the broken system themselves firsthand, compared to staff who attended college when it was more affordable. This was not borne out by the data.

As I explore in my project leads finding chapter, older staff were much more likely to say that their appeal processes were overly onerous for students. On reflection, this seems linked to the willingness to push at authority and be less docile with more professional experience and seniority. This finding also speaks directly to the challenges that Zacka (2017, p. 50) explicates around the conflicting remits that SLBs are often charged with. This is clear in financial aid, where staff are supposedly there to support student access to financial aid and through financial aid higher education but must only provide that support within quite tight strictures of regulation and compliance. Given these competing and complex demands, it is perhaps unsurprising that it takes years of experience to figure out how to effectively navigate these issues in a way that supports both goals as well as is possible. This matches work on teachers by Bushnell (2003), who draws on Foucault to suggest teachers exercise limited control over how they are held accountable for their work, in particular noting that newer teachers are more comfortable with dictated compliance requirements. Professional experience matters and might give staff the confidence to navigate regulations in a way that both meets compliance requirements and supports students effectively.

8.8. Informational interventions work, to a point

Evidence from my findings chapters suggests that providing both project leads and financial aid staff with additional information can help push them towards slightly more advocacy-

based approaches in specific areas. I say this while acknowledging that my research design does not allow for a causal relationship to be determined. This research is exploratory and descriptive. There does appear to be promise in providing financial aid staff with better information to move them toward an advocacy mindset. In Chapter nine I discuss possibilities for future research using alternative research designs that might allow for causality to be determined.

Providing better information on the flaws in financial aid formulas, how negative EFC can be used to direct support to students, and how supports outside of financial aid can benefit students seems to have increased understanding and willingness to use those supports to aid students. A running theme in my exploration of theory has been the idea of docility and whether financial aid staff are really docile as a result of constant compliance requirements.

A key finding in this work was that improved information on things like public benefits access and emergency aid led to improved comfort referring students to those resources. Helping financial aid staff feel comfortable with resources that fall outside of traditional financial aid supports may provide a key mechanism for increasing advocacy-based approaches without financial aid staff having to worry that they might be breaking regulatory rules. This requires a broadening of what it means to support students in financial aid offices, but one that is in line with moves from ED (National Association of Student Financial Aid Administrators, 2021) to connect students to supports like public benefits in addition to traditional financial aid.

Information on its own is not sufficient to lead to changes in approach. Several project leads made it clear that absent direction from ED, they would be broadly unwilling to use things like negative EFC in all but very limited ways. As I noted earlier, it is not sufficient to provide an ability to utilize discretion. Staff and leaders have to feel safe in exercising that discretion. This issue touches on the challenge of blame avoidance articulated by Hood (2014). Currently, the risks of professional judgement are all laid on individual staff and their institutions as potential blame for negative decisions has been shifted from the federal government. This is similar to challenges Meers (2019) highlights around welfare policy in the UK. By investing financial aid staff with sole discretion for professional judgement, the federal government can attempt to show they have provided means for the most in need students to get extra support without providing additional support or funds for those students.

For financial staff to feel safer exercising professional judgement there needs to be a shift in how discretion is considered legitimate, ceding more decision making authority to financial aid staff, and reducing the fear of accidentally breaking the rules As Bushnell (2003, p. 256) correctly points out constant external surveillance removes ‘decision-making autonomy’ from staff. Bushnell also identifies the challenge of staff being complicit in the systems of surveillance that restrict their work. Similarly, as I explained in my theory section, Zacka (2017) explores the challenges of discretion as granted versus exercised, while Evans and Harris (2004) speak to discretion avoidance as a blame avoidance tactic if mistakes are made. Recent policy changes from ED to encourage discretion (National Association of Financial Aid Administrators, 2020b) may be the start of changing this dynamic, but continued research on how discretion can be encouraged while also ensuring integrity in the system is held high would be worthwhile.

8.9. Limitations of this work

The existing empirical work on financial aid staff is very limited. As such, this represents an important contribution to better understanding the work of financial aid professionals. It is also true that this approach inevitably misses details on things like staff motivations and professional self-conception. Understanding motivations and professional self-conception from survey questions, even open-ended ones is inherently challenging. It is hard to dig more deeply into why a staff member answered a question from a compliance standpoint versus advocacy using this approach. Zacka (2017) notes that staff can move between advocate, indifferent and compliance-focused through their careers, or even in any given work week. This work illustrates some of what drives financial aid staff in their work, but it still only draws a partial picture. More in-depth interview-based work could provide a greater understanding of the staff surveyed here.

8.10. Further research

My work here begins to explore the important role that financial aid staff play in interpreting regulations, supporting students, and helping smooth or roughen the path students take through the financial aid process. What is clear is that staff knowledge and experience matters greatly for their willingness to take on advocacy-based approaches over indifference or

ensuring compliance first. The research on how financial aid staff impact student experience and to what extent they can either remove or increase barriers to accessing financial aid and higher education remains limited. This work begins to explore the importance of financial aid staff in this context. More research is needed.

There are opportunities to conduct more in-depth interview-based work on how financial aid staff think about their roles, what motivates them and what changes in regulation or their training might make it easier to take on advocacy first approaches to their work. My findings here suggest that financial aid staff take more compliance-based approaches, but my understanding of why that is the case is more limited. Improved understanding of to what extent federal regulations condition staff to take compliance-based approaches would be useful in determining how to craft regulations that support students more effectively. There is considerable room to tie this kind of research to how effective financial aid counseling can support student access to higher education. Additionally, there is room to investigate where financial aid offices would spend more staff time if they were able to spend less time and money on compliance-based requirements such as verification. A more complete and nuanced understanding of how financial aid staff approach their work could lead to improved policy and practice at both a national and institutional level.

Chapter 9. Conclusions

9.1. Answering my research questions

This research set out to answer three main questions. The first question was to determine how well project leads and financial aid staff understand the limitations of the federal financial aid system. Testing understanding of this was an essential part of understanding whether the advocacy compliance approach I was primary concerned with would be useful. Financial aid staff who do not see much wrong with the system they work in are not likely to want to change it. I also thought they might be less likely to see the need to be advocates for their students. Survey data and our initial meeting with project leads showed that many of the project leads did not have a good understanding of the flaws of the financial aid system. This finding carried over to financial aid staff as well, with many of them having a surprisingly limited understanding of some of the central issues with the financial aid system. It is of course possible that the methodology of the study did not provide the best approach to help financial aid staff explain their approach the same way they would with a student. Open ended survey questions do not provide the same depth as interviews would have done, which might have allowed financial aid staff to provide more thorough explanations of how they explained complex issues to students.

My second research question was do financial aid staff at the participating institutions see themselves as being able to support students outside of tight strictures, and do they have the agency to do so? The first part of this question was answered by my data on comfort with referring students to supports outside of financial aid. My data show that staff are only somewhat comfortable referring students to resources outside of traditional financial aid. In regard to questions of agency I think that my data collected did not adequately address the second part of the question. This was one area it became clear that the use of surveys without supporting interview data made it challenging to adequately answer this part of the question. I see the possibility for future work using interviews to support survey data as a way to explore these issues in greater depth.

My third research question was how well do financial aid staff understand student supports that go beyond financial aid? This question helped me determine how knowledgeable financial aid staff were about the supports they could direct students towards outside of traditional financial aid. This question also helped me understand how comfortable staff were referring students to those additional resources if they had them available at their institution. My survey data suggests that project leads, and staff are willing to use supports beyond financial aid, but that more information about those supports can help improve comfort with, and knowledge of those supports.

To help answer my research questions, I used a vignette approach to categorize financial aid, and staff and project leads as compliance-focused, advocacy-focused or indifferent, adopting a similar approach to Zacka (2017) in his ethnographic work on Street-level Bureaucrats (SLBs) as an update on Lipsky's (2010) work in this area. I further theorized that if financial aid staff were more compliance-focused in their work, it was at least partially driven by a fear of constant surveillance from the Department of Education (ED). I also utilize ideas of administrative burden from Herd and Moynihan (2019) to explicate why these lie most heavily on programs like financial aid that are meant to serve those with the fewest resources. Lastly, I used Foucault's exploration of the Panopticon and Ball's work on performativity to suggest that compliance-focused work is driven by a fear of ending up in trouble with federal regulations and by the idea that much of the compliance-focused work is performative in nature. By analyzing my data through these theoretical lenses, I have shown where and how financial aid work is driven by fears of surveillance and how the systems that create that surveillance relate to the literature on administrative burden.

9.2. This work in context

There is a great deal of research on financial aid, but, as I have noted earlier, the research on the staff who administer the system is limited. Research on how students experience financial aid, how it can be better targeted or simplified, and how to improve the way we conduct aid calculations are all vital. Without reference to how the resulting changes in policy and practice are implemented by the staff on the frontlines, such work will always be missing a piece of necessary explanation for how or why some policies are more effective than others. Developing policy based on research without reference to those who will implement it on the frontline is likely to lead to less effective policy. I am indebted to all the work that has been

completed before this and hope that adding to that chorus with work that highlights how financial aid staff can and should be brought into conversations of systems change will continue to increase the work done beside and for financial aid administrators.

9.3. Financial aid staff operate within a system that pushes them to focus on compliance

It might seem that this work levels a great deal of critique at financial aid staff for adopting compliance-driven work patterns, and in some ways, it does, including at myself as a former financial aid administrator. What is hopefully clear is the extent to which I see these work patterns as being driven by the system that financial aid administrators find themselves bound up in. As my context chapter shows, the financial aid system in the United States is immensely complex and bounded by so many rules and regulations that it is hardly surprising that financial aid staff tend to have their work dictated by compliance requirements first and foremost. It is also the case that while I came into this work with the hypothesis that financial aid staff were compliance driven, that was only partially true, and it was clear that those attitudes can be changed with the right approaches. Financial aid leaders and staff are clearly both willing and able to operate in less compliance-driven ways. The current structures and incentives they work with rarely allow for that, however. There is room to create change, even without the input of ED, and even more room with it. My conclusions here lay out how I think this work has shown that there are good ways to encourage advocacy-focused work patterns for financial aid staff.

9.4. Summary of findings: Financial Aid staff tend to be compliance-driven

My findings have shown that financial aid administrator's work is largely driven by compliance requirements and that, as a result, they adopt compliance-focused work patterns. I have also made it clear that those compliance requirements are in large part driven by the systemic structure of financial aid, where there is a heavy focus on compliance from the

department of education that tends to look down upon financial aid offices from their panoptic tower, threatening consequences if errors are made.

Project leads also tended to have quite compliance-driven approaches to their work at the start of the project, although project leads without financial aid backgrounds seemed to be more open to change and different approaches than those who had financial aid backgrounds. By using the vignette approach, I was able to group staff and project leads into differing approaches that provided a typological expression of how they approached their work. This approach helped to explore how financial aid staff approach their work broadly, providing a way to categorize responses and determine how many staff took advocacy, compliance, or indifferent approaches to their work.

It is important to note that financial aid staff are often working with limited resources, under pressure to provide students with timely information so they receive the financial support they need. Additionally, with the apprenticeship model that financial aid operates under, there is often less training and professional development available than is ideal. During the first meeting with project leads one of the financial aid directors noted that their staff was mostly made up of people who did not have the training needed to consider professional judgement decisions or other tasks that require a high degree of discretionary decision making. This meant that the director in question was left with most of the decisions that required professional judgement. In that context, it is understandable that some staff would not take an advocacy-based approach to their work. If staff are unable to make discretionary decisions, it is harder to adopt anything other than a compliance driven, rules-based approach to their work.

9.5. Informational interventions work to an extent, and leadership matters

My findings show both a willingness and ability from project leads and financial aid staff to take in and utilize better data about student need. There was also a willingness to explore problems within financial aid formulas and consider ways to support students outside of traditional financial aid. Providing financial aid project leads with better information, seems to have increased comfort with supports beyond financial aid, and a willingness to send

students to those supports. Additionally, some project leads were willing to use negative EFC to identify students with the greatest need and possibly to use that information to direct supports to those students. This included sharing that information with their frontline staff. This makes it clear that while staff can exercise discretion and hopefully take on more advocacy-based approaches in their work, they are perhaps more likely to do so if their leadership are willing and able to welcome and adopt advocacy-based approaches to their work. In chapter nine I noted that my methodological approach does not allow for causal conclusions to be drawn, so I am deliberately cautious with my conclusions here. With respect to the conclusions drawn from the project leads I feel able to make slightly stronger claims due to the much larger number of interactions with them, and the use of extensive field notes from meetings with the project leads to help support the conclusions drawn from the survey data.

9.6. Experience and discretion are linked

My data suggest that it takes time and experience for financial aid staff to feel that they can exercise discretion and should go beyond typical financial aid mechanisms when supporting their students. Staff with more years of experience were more likely to think that some of their compliance processes, such as appeals, were overly onerous and that it was part of their jobs to know about supports for students outside of the financial aid system. Given the complexity of financial aid regulations, it is perhaps not surprising that simply learning the basics takes a long time. Knowing those basics inside and out might be part of feeling more comfortable supporting students outside of traditional financial aid supports. Given that more information about things like benefits access increased comfort with them, it is likely that this is simply a question of experience breeding additional comfort and knowledge with regulations. Most importantly, increased knowledge of regulatory intricacies can help staff know where those regulations can be bent and subverted in aid of supporting students.

9.7. Implications for Theory and Higher Education

I have used Ball (Ball, 1990, 2000, 2003, 2013) in this work to explore ideas of performativity and how that translates to the performative elements of financial aid's focus on compliance requirements. This touches on key debates around how much latitude to afford professionals

in education and whether and to what extent professional discretion is positive. I have shown that a binary approach to this discussion is overly simplistic. Discretion in and of itself is only useful in so much as the structures and regulations underpinning discretion encourage its use when needed. It is also true that discretion is only useful when it is wielded (Karseth & Møller, 2020; Meers, 2019). As I noted in chapter four, regulation forcing institutions to have appeals processes indicates that offering the power of discretion is insufficient. Institutions and individuals need the reassurance that they will not be punished for exercising discretion and for individuals, the training to exercise it well.

Ideally, theory can be used to inform both understanding and explicate real-world implications. I have variously touched on ideas of compliance regimes informed by Foucault and Ball (Ball, 1990; Foucault, 1977, 1980), the ways that SLBs go about their work within compliance regimes, and how administrative burdens create these regimes (Heinrich, 2015; Herd & Moynihan, 2019). All of these theoretical perspectives point to a larger issue. The central challenge is that providing funding for higher education in the convoluted and complex manner used in the US necessitates the significant administrative burdens and heavy-handed compliance regime. While newer to the United Kingdom, this speaks to a central debate around how access is provided to higher education in the US. Without such a complex, means-tested system, many of the challenges explored here would if not erased, at least be ameliorated.

9.8. Impacts on My Professional Practice

I no longer work directly in financial aid offices. I do, however, spend a significant amount of time creating training for financial aid staff, writing policy recommendations for financial aid broadly, and generally working to positively impact the policy and practice of financial aid broadly. This work has both confirmed and challenged my preconceptions about my own work and the work of my colleagues in financial aid. The research has confirmed my thinking on financial aid staff and our focus on compliance issues. Compliance issues often overwhelm the rest of the work. At the same time, my findings have made me more sympathetic to the challenges of taking an advocacy approach to work that is so tightly bound in compliance requirements. If I wish to continue trying to create some change in this field, at both the policy and practice level, then I need to start from the understanding that most financial aid staff are walking a razor-thin line between doing their best to support students and to meet the

onerous compliance requirements they operate under. This work has also solidified my desire to continue working on these issues from outside of financial aid office, in the hope that I can help improve things, even if just a little, for those who do work in financial aid offices, and most importantly for the students that they serve.

9.9. Recommendations

Providing both project leads and financial aid staff with improved information changed how they thought about offering different supports for students. It seems clear that improving the information that financial aid staff have at their disposal is a key part of helping them to take on more advocacy-based approaches. This can include direct financial aid information, such as negative EFC, but also information about supports that exist outside of the regular financial aid system, such as benefits access help for students. Until there is additional financial aid support available for students, finding new ways to offer students with financial need support will remain part of the job for financial aid staff that want to take on a more advocacy-focused approach.

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Chapter 11. Appendices

11.1. Appendix A. Project Leads Survey 1. Survey administered to all project leads

Start of Block: Block 1 - Consent

Q0 Research Participant Information and Consent Form **Title of the Study: The Real Price of College: Improving Estimates of "Demonstrated Financial Need"** **Principal Investigator: Sara Goldrick-Rab**

DESCRIPTION OF THE RESEARCH The study is focused on creative ways of thinking about student financial need, different ways of calculating cost of attendance and whether we should allow for negative expected family contributions.

WHAT WILL MY PARTICIPATION INVOLVE? This survey will take approximately 15 minutes to complete. All information you provide will be kept private. ARE THERE ANY RISKS TO ME? There are no risks to you by taking this survey. We will keep your responses confidential and stored on our secure server.

ARE THERE ANY BENEFITS TO ME? There are no direct benefits to participating in this study, however your participation in this research may benefit other people in the future by helping researchers learn more about financial aid processes.

HOW WILL MY CONFIDENTIALITY BE PROTECTED? Your privacy is very important to us. All of the information collected in this study will be treated confidentially. We will not ask for your name or connect it with your responses. Only group data will be published. To protect your privacy, only approved personnel will have access to the data. Survey data will be stored on a secure Temple University server. Study data may be used for future purposes.

WHOM SHOULD I CONTACT IF I HAVE QUESTIONS? You may ask any questions about the research at any time. If you have questions about the survey you should contact the Temple University Hope Center Managing Director/Research Director, Christine Baker-Smith by email at christine.baker-smith@temple.edu. If you are not satisfied with the response of the

research team, have more questions, or want to talk with someone about your rights as a research participant, you should contact the Education Research and Social/Behavioral Science IRB Office at IRB@temple.edu.

AGREEMENT TO PARTICIPATE IN THIS STUDY Your participation in this study is completely voluntary. If you decide not to participate or to withdraw, you may do so at any time by simply discontinuing the survey.

Q00 By continuing on to the survey, you certify that you are at least 18 years old and voluntarily consent to participate in this research study.

Continue to survey (1)

End of Block: Block 1 - Consent

Start of Block: Block 3

Q000 Please tell us which institution you work at (this information is purely for analytic purposes. Individual answers will not be shared with your institution)

▼ El Paso Community College (1) ... San Jacinto Community College (6)

End of Block: Block 3

Start of Block: Block 2 - Questions

Q1 *First, we would like to know more about your perceptions of financial aid.*

Q2 **What do you believe the concept of a student's "demonstrated financial need" should measure for the effective delivery of financial aid?**

Q2 **To what extent do you agree that the following current federal measures are accurate?**

Strongly disagree (1) Somewhat disagree (2) Neither agree nor disagree (3) Somewhat agree (4) Strongly agree (5)

Demonstrated financial need (i.e., the difference between total college costs and the family's ability to pay) (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expected family contribution (EFC) (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q3 Please briefly explain the reason for your assessment of the accuracy of expected family contribution (EFC) in the previous question.

Q4 To what extent do you agree that your institution's cost of attendance (COA) accurately reflects your students' non-tuition costs (e.g. housing and meals, transportation, books and supplies, and personal expenses)?

- Strongly disagree (1)
- Somewhat disagree (2)
- Neither agree nor disagree (3)

Somewhat agree (4)

Strongly agree (5)

Q5 In your own words, describe what a “negative expected family contribution” is and briefly describe how a student might have one. Do not use any other resources - just share your candid thoughts. If you don’t know, please say so.

Q6 How confident are you that the answer you provided regarding "negative expected family contribution" is accurate?

Not at all confident (1)

Somewhat confident (2)

Very confident (3)

Q7 Next please tell us a little bit about your campus.

Q8 Who on your campus is responsible for setting and updating cost of attendance (COA)?

Please provide the individual's title or role rather than their name.

Director of Financial Aid (4)

VP of Enrollment Management (5)

Committee with multiple representatives (6)

Other (please write your answer) (7)

Q9 If you were tasked with revising your institution's living expense calculations for the cost of attendance (COA), what would you do? What steps would you take? *If you don't know, please say so.*

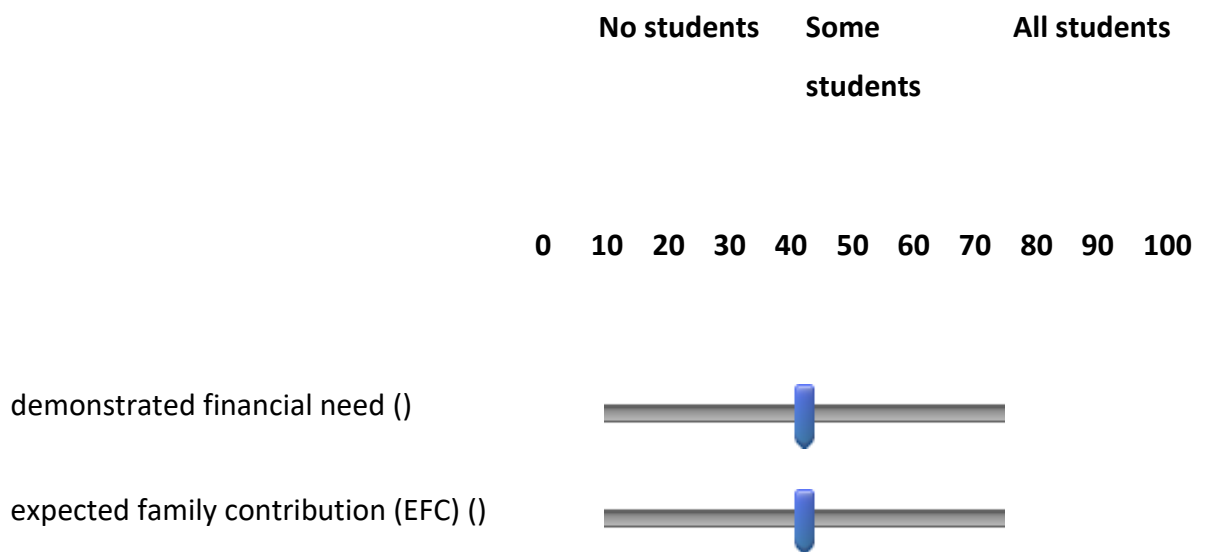
Q10 How does your college or university determine the cost for a student to live off campus?

Q11 How confident are you that the answer you provided regarding how your college or university determines the cost of off-campus living is accurate?

- Not at all confident (1)
- Somewhat confident (2)
- Very confident (3)

Q12 Last we would like to know more about your students and the information they receive.

Q13 To the best of your knowledge, about what percentage of your students are receiving completely accurate financial aid information from their stated...



cost of attendance (COA) ()



End of Block: Block 2 - Questions

Start of Block: Block 3 - Thank you

Q14 Thank you for your time, we appreciate you taking this survey. We appreciate you sharing expertise. As a reminder your response will be kept confidential. Your expertise will contribute to improving understanding of student financial need and help find better ways to support those students.

End of Block: Block 3 - Thank you

11.2. Appendix B. Financial Aid Staff Survey 1. Administered to all financial aid staff at participating Institutions.

Start of Block: Consent

QA Research Participant Information and Consent Form Title of the Study: The Real Price of College: Improving Estimates of "Demonstrated Financial Need" Principal Investigator: Dr. Sara Goldrick-Rab DESCRIPTION OF THE RESEARCH The study will develop and evaluate creative approaches to how financial aid offices think about and calculate cost of attendance and student demonstrated financial need, including running calculations to determine if some students should have negative expected family contributions. This project will also provide resources for participating institutions to find new ways to support students who have unrecognized financial need.

WHAT WILL MY PARTICIPATION INVOLVE? This survey will take approximately 15 minutes to complete. All information you provide will be kept private. ARE THERE ANY RISKS TO ME? There are no risks to you by taking this survey. We will keep your responses confidential and stored on our secure server.

ARE THERE ANY BENEFITS TO ME? There are no direct benefits to participating in this study, however your participation in this research may benefit other people in the future by helping researchers learn more about financial aid processes.

HOW WILL MY CONFIDENTIALITY BE PROTECTED? Your privacy is very important to us. All of the information collected in this study will be treated confidentially. We will not ask for your name or connect it with your responses. Only group data will be published. To protect your privacy, only approved personnel will have access to the data. Survey data will be stored on a secure Temple University server. Study data may be used for future purposes.

WHOM SHOULD I CONTACT IF I HAVE QUESTIONS? You may ask any questions about the research at any time. If you have questions about the survey you should contact the Temple University Hope Center Research Director, Christine Baker-Smith by email at christine.baker-smith@temple.edu. If you are not satisfied with the response of the research

team, have more questions, or want to talk with someone about your rights as a research participant, you should contact the Education Research and Social/Behavioral Science IRB Office at IRB@temple.edu.

AGREEMENT TO PARTICIPATE IN THIS STUDY Your participation in this study is completely voluntary. If you decide not to participate or to withdraw, you may do so at any time by simply discontinuing the survey.

Q0 By continuing on to the survey, you certify that you are at least 18 years old and voluntarily consent to participate in this research study.

After Selecting the check box indicating your consent to the survey you will need to click on the arrow on the right hand side of the page to proceed to first question.

Continue to survey (1)

End of Block: Consent

Start of Block: Block 14

Q00 Please tell us which institution you work at (this information is purely for analytic purposes. Individual answers will not be shared with your institution)

▼ El Paso Community College (1) ... San Jacinto Community College (6)

End of Block: Block 14

Start of Block: Financial Aid

Q000 Thank you for taking this survey! First, we're going to ask you a few quick questions about Expected Family Contribution (EFC).



Q1 Could you manually calculate a student's Expected Family Contribution (EFC) using only the EFC formula worksheets from the Information for Financial Aid Professionals site (IFAP) with no other assistance?

- No (0)
 - Yes (1)
 - I'm not sure (2)
-

Q2 Thinking about a typical week, how often do you explain the definition of EFC to a student?

- Rarely (1-2 times per week) (1)
 - Occasionally (3-5 times per week) (2)
 - Frequently (5-10 times per week) (3)
 - Very frequently (more than 10 times per week) (4)
-

Q3 When advising students, how do you explain . . .

Q4 . . . how EFC helps determine a student's financial aid package?

Q5 . . . your institution's cost of attendance to a student?

Q6 . . . that their financial aid package will not cover all their costs if they are a \$0 EFC student?

Q7 When a student has unmet financial need what do you usually do to support that student?
(Please select the supports you would use and arrange them in the order you would utilize those options, with 1 being your most frequently used support)

This is something I would use to support the student	This is not something I would use to support the student
_____ Refer them to private loan options (1)	_____ Refer them to private loan options (1)
_____ Suggest a parent PLUS loan (2)	_____ Suggest a parent PLUS loan (2)
_____ Refer them to scholarship search sites (3)	_____ Refer them to scholarship search sites (3)

- _____ Refer them to Public benefits programs (4)
- _____ Provide financial literacy or budgeting resources (5)
- _____ Suggest student attend part time (6)
- _____ Suggest student consider different living arrangements (7)
- _____ Provide them with information on emergency aid (8)
- _____ Nothing, I have no other options (9)
- _____ Other (please specify) (10)

- _____ Refer them to Public benefits programs (4)
- _____ Provide financial literacy or budgeting resources (5)
- _____ Suggest student attend part time (6)
- _____ Suggest student consider different living arrangements (7)
- _____ Provide them with information on emergency aid (8)
- _____ Nothing, I have no other options (9)
- _____ Other (please specify) (10)

End of Block: Financial Aid

Start of Block: Support mechanisms

Q8 The following question will present you with various support mechanisms your college may or may not have available to students.

For each support option presented, tell us whether your college offers it. You will then be asked some additional questions about each support mechanism that is offered at your college.



Q9 Does your institution offer the following programs or services for students?

	No (0)	Yes (1)	I'm not sure (2)
Enrollment assistance for public benefits access (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free public transit passes (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gas cards (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free tax preparation (6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free legal services (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emergency financial aid (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food pantry (7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Meal vouchers (8)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Grocery store gift cards (9)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emergency housing (10)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Subsidized childcare (11)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

End of Block: Support mechanisms

Start of Block: Support: Public benefits access

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q10 How knowledgeable do you feel about enrollment assistance for public benefits access?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q11 Do you feel comfortable referring students to enrollment assistance for public benefits access?

- Definitely not (6)
- Probably not (7)
- Might or might not (8)
- Probably yes (9)
- Definitely yes (10)

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q12 To what extent do you agree with the following statements about enrollment assistance for public benefits access?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

I have been
trained on
who qualifies
for the
program. (3)

It is part of
my job to
refer students
to campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the

program
would help a
student
referred to it.

(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.

(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q13 Is there anything else you would like to share with us about enrollment assistance for public benefits access at your institution?

End of Block: Support: Public benefits access

Start of Block: Support: Free public transit passes

Display This Question:

If Q9 = Free public transit passes [Yes]

Q14 How knowledgeable do you feel about free public transit passes offered at your institution?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Free public transit passes [Yes]

Q15 Do you feel comfortable referring a student to free public transit passes?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Free public transit passes [Yes]

Q16 To what extent do you agree with the following statements about free public transit passes?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

I have been
trained on
who qualifies
for the
program. (3)

It is part of
my job to
refer students
to campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the

program
would help a
student
referred to it.

(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.

(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Free public transit passes [Yes]

Q17 Is there anything else you would like to share with us about free public transit passes at your institution?

End of Block: Support: Free public transit passes

Start of Block: Support: Gas cards

Display This Question:

If Q9 = Gas cards [Yes]

Q18 How knowledgeable do you feel about gas cards provided to students?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Gas cards [Yes]

Q19 Do you feel comfortable referring a student to the program that provides gas cards?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Gas cards [Yes]

Q20 To what extent do you agree with the following statements about the program that provides gas cards?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

for the
program. (3)

It part of my
job to refer
students to
campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student

referred to it.

(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.

(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Gas cards [Yes]

Q21 Is there anything else you would like to share with us about gas cards?

End of Block: Support: Gas cards

Start of Block: Support: Free tax prep

Display This Question:

If Q9 = Free tax preparation [Yes]

Q22 How knowledgeable do you feel about free tax preparation offered to students?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Free tax preparation [Yes]

Q23 Do you feel comfortable referring students to free tax preparation?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Free tax preparation [Yes]

Q24 To what extent do you agree with the following statements about the program that provides free tax preparation?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

who qualifies
for the
program. (3)

It part of my
job to refer
students to
campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a

student referred to it.
(8)

Only certain people can refer students and I am not one of those people. (9)

Students already have too many referrals and I do not want to overburden them. (10)

I have been told not to refer students to this program.
(11)

I do not believe this is a support we should offer. (12)

Display This Question:

If Q9 = Free tax preparation [Yes]

Q25 Is there anything else you would like to share with us about free tax preparation at your institution?

End of Block: Support: Free tax prep

Start of Block: Support: Free legal services

Display This Question:

If Q9 = Free legal services [Yes]

Q26 How knowledgeable do you feel about free legal services?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Free legal services [Yes]

Q27 Do you feel comfortable referring students to free legal services?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Free legal services [Yes]

Q28 To what extent do you agree with the following statements about the program that provides free legal services?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

who qualifies
for the
program. (3)

It is part of
my job to
refer students
to campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a

student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Free legal services [Yes]

Q29 Is there anything else you would like to share with us about free legal services at your institution?

End of Block: Support: Free legal services

Start of Block: Support: Emergency financial aid

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q30 How knowledgeable do you feel about emergency financial aid?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q31 Do you feel comfortable referring students to emergency financial aid?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q32 To what extent do you agree with the following statements about emergency financial aid?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

who qualifies
for the
program. (3)

It is part of
my job to
refer students
to campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a

student referred to it.
(8)

Only certain people can refer students and I am not one of those people. (9)

Students already have too many referrals and I do not want to overburden them. (10)

I have been told not to refer students to this program.
(11)

I do not believe this is a support we should offer. (12)

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q33 Is there anything else you would like to share with us about emergency financial aid?

End of Block: Support: Emergency financial aid

Start of Block: Support: Food pantry

Display This Question:

If Q9 = Food pantry [Yes]

Q34 How knowledgeable do you feel about the campus food pantry?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Food pantry [Yes]

Q35 Do you feel comfortable referring students to the campus food pantry?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Food pantry [Yes]

Q36 To what extent do you agree with the following statements about the campus food pantry?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

who qualifies
for the
program. (3)

It part of my
job to refer
students to
campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a

student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Food pantry [Yes]

Q37 Is there anything else you would like to share with us about the campus food pantry?

End of Block: Support: Food pantry

Start of Block: Support: Meal vouchers

Display This Question:

If Q9 = Meal vouchers [Yes]

Q38 How knowledgeable do you feel about meal vouchers?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Meal vouchers [Yes]

Q39 Do you feel comfortable referring students to meal vouchers?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Meal vouchers [Yes]

Q40 To what extent do you agree with the following statements about meal vouchers?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

I have been
trained on
who qualifies
for the
program. (3)

It part of my
job to refer
students to
campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the

program
would help a
student
referred to it.

(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.

(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Meal vouchers [Yes]

Q41 Is there anything else you would like to tell us about meal vouchers?

End of Block: Support: Meal vouchers

Start of Block: Support: Grocery store gift cards

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q42 How knowledgeable do you feel about grocery store gift cards?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q43 Do you feel comfortable referring students to grocery store gift cards?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q44 To what extent do you agree with the following statements about the program that provides grocery store gift cards?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

explained to
me. (2)

I have been
trained on
who qualifies
for the
program. (3)

It part of my
job to refer
students to
campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support

we should
offer. (12)

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q45 Is there anything else you would like to tell us about grocery store gift cards?

End of Block: Support: Grocery store gift cards

Start of Block: Support: Emergency housing

Display This Question:

If Q9 = Emergency housing [Yes]

Q46 How knowledgeable do you feel about emergency housing?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Emergency housing [Yes]

Q47 Do you feel comfortable referring students to emergency housing?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Emergency housing [Yes]

Q48 To what extent do you agree with the following statements about the program that provides emergency housing?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

who qualifies
for the
program. (3)

It part of my
job to refer
students to
campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a

student referred to it.
(8)

Only certain people can refer students and I am not one of those people. (9)

Students already have too many referrals and I do not want to overburden them. (10)

I have been told not to refer students to this program.
(11)

I do not believe this is a support we should offer. (12)

Display This Question:

If Q9 = Emergency housing [Yes]

Q49 Is there anything else you would like to tell us about emergency housing?

End of Block: Support: Emergency housing

Start of Block: Support: Subsidized childcare

Display This Question:

If Q9 = Subsidized childcare [Yes]

Q50 How knowledgeable do you feel about subsidized childcare?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Subsidized childcare [Yes]

Q51 Do you feel comfortable referring students to subsidized childcare?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Subsidized childcare [Yes]

Q52 To what extent do you agree with the following statements about the program that provides subsidized childcare?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

who qualifies
for the
program. (3)

It is part of
my job to
refer students
to other
campus
services like
this one. (4)

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program

would help a student referred to it.

(8)

Only certain people can refer students and I am not one of those people. (9)

Students already have too many referrals and I do not want to overburden them. (10)

I have been told not to refer students to this program.

(11)

I do not believe this is a support we should offer. (12)

Display This Question:

If Q9 = Subsidized childcare [Yes]



Q53 Is there anything else you would like to tell us about subsidized childcare?

End of Block: Support: Subsidized childcare

11.3. Appendix C. Project Leads Survey 2. Survey administered to all project leads

Start of Block: Block 1 - Consent

Q0 Research Participant Information and Consent Form Title of the Study: The Real Price of College: Improving Estimates of "Demonstrated Financial Need" Principal Investigator: Sara Goldrick-Rab

DESCRIPTION OF THE RESEARCH The study is focused on creative ways of thinking about student financial need, different ways of calculating cost of attendance and whether we should allow for negative expected family contributions.

WHAT WILL MY PARTICIPATION INVOLVE? This survey will take approximately 15 minutes to complete. All information you provide will be kept private. **ARE**

THERE ANY RISKS TO ME? There are no risks to you by taking this survey. We will keep your responses confidential and stored on our secure server.

ARE THERE ANY BENEFITS TO ME? There are no direct benefits to participating in this study, however your participation in this research may benefit other people in the future by helping researchers learn more about financial aid processes.

HOW WILL MY CONFIDENTIALITY BE PROTECTED? Your privacy is very important to us. All of the information collected in this study will be treated confidentially. We will not ask for your name or connect it with your responses. Only group data will be

published. To protect your privacy, only approved personnel will have access to the data. Survey data will be stored on a secure Temple University server. Study data may be used for future purposes.

WHOM SHOULD I CONTACT IF I HAVE QUESTIONS? You may ask any questions about the research at any time. If you have questions about the the survey you should contact the Temple University Hope Center Managing Director/Research Director, Christine Baker-Smith by email at christine.baker-smith@temple.edu. If you are not satisfied with the response of the research team, have more questions, or want to talk with someone about your rights as a research participant, you should contact the Education Research and Social/Behavioral Science IRB Office at IRB@temple.edu.

AGREEMENT TO PARTICIPATE IN THIS STUDY Your participation in this study is completely voluntary. If you decide not to participate or to withdraw, you may do so at any time by simply discontinuing the survey.

Q00 By continuing on to the survey, you certify that you are at least 18 years old and voluntarily consent to participate in this research study.

Continue to survey (1)

End of Block: Block 1 - Consent

Start of Block: Block 3

Q000 Please tell us which institution you work at (this information is purely for analytic purposes. Individual answers will not be shared with your institution)

▼ El Paso Community College (1) ... San Jacinto Community College (6)

End of Block: Block 3

Start of Block: Block 4

Q26 As you answer the survey questions, please consider and tell us in your responses if/how your views may have changed since our meeting in September at the #RealCollege Conference.

End of Block: Block 4

Start of Block: Block 2 - Questions

Q1 First, we would like to know more about your perceptions of financial aid.

Q2 What do you believe the concept of a student's "demonstrated financial need" should measure for the effective delivery of financial aid?

(Please tell us if/how your understanding has changed since our kickoff meeting)

Q2 To what extent do you agree that the following current federal measures are accurate?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
Demonstrated financial need (i.e., the difference between total college costs and the family's ability to pay) (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Expected
family
contribution
(EFC) (2)

Q3 Please briefly explain the reason for your assessment of the accuracy of expected family contribution (EFC) in the previous question.

Q4 To what extent do you agree that your institution's cost of attendance (COA) accurately reflects your students' non-tuition costs (e.g. housing and meals, transportation, books and supplies, and personal expenses)?

- Strongly disagree (1)
 - Somewhat disagree (2)
 - Neither agree nor disagree (3)
 - Somewhat agree (4)
 - Strongly agree (5)
-

Q5 In your own words, describe what a “negative expected family contribution” is and briefly describe how a student might have one. Do not use any other resources - just share your candid thoughts. If you don’t know, please say so.

Q6 How confident are you that the answer you provided regarding "negative expected family contribution" is accurate?

- Not at all confident (1)
 - Somewhat confident (2)
 - Very confident (3)
-

Q7 Next please tell us a little bit about your campus.

Q8 Who on your campus is responsible for setting and updating cost of attendance (COA)? Please provide the individual's title or role rather than their name.

- Director of Financial Aid (4)
 - VP of Enrollment Management (5)
 - Committee with multiple representatives (6)
 - Other (please write your answer) (7)
-

Q9 If you were tasked with revising your institution’s living expense calculations for the cost of attendance (COA), what would you do? What steps would you take? *If you don’t know, please say so.*

Q10 How does your college or university determine the cost for a student to live off campus?

Q11 How confident are you that the answer you provided regarding how your college or university determines the cost of off-campus living is accurate?

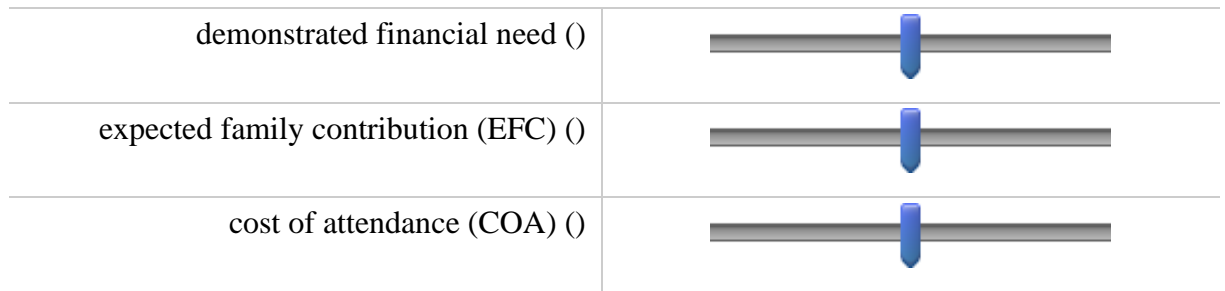
- Not at all confident (1)
- Somewhat confident (2)
- Very confident (3)

Q12 Last we would like to know more about your students and the information they receive.

Q13 To the best of your knowledge, about what percentage of your students are receiving completely accurate financial aid information from their stated...

No students Some students All students

0 10 20 30 40 50 60 70 80 90 100



End of Block: Block 2 - Questions

Start of Block: Block 3 - Thank you

Q14 Thank you for your time, we appreciate you taking this survey. We appreciate you sharing expertise. As a reminder your response will be kept confidential. Your expertise will contribute to improving understanding of student financial need and help find better ways to support those students.

End of Block: Block 3 - Thank you

11.4. Appendix D. Financial Aid Staff Survey 2. Administered to all financial aid staff at participating Institutions.

Start of Block: Consent

QA Research Participant Information and Consent Form Title of the Study: The Real Price of College: Improving Estimates of "Demonstrated Financial Need" Principal Investigator: Dr. Sara Goldrick-Rab DESCRIPTION OF THE RESEARCH The study will develop and evaluate creative approaches to how financial aid offices think about and calculate cost of attendance and student demonstrated financial need, including running calculations to determine if some students should have negative expected family contributions. This project will also provide resources for participating institutions to find new ways to support students who have unrecognized financial need.

WHAT WILL MY PARTICIPATION INVOLVE? This survey will take approximately 15 minutes to complete. All information you provide will be kept private. ARE THERE ANY RISKS TO ME? There are no risks to you by taking this survey. We will keep your responses confidential and stored on our secure server.

ARE THERE ANY BENEFITS TO ME? There are no direct benefits to participating in this study, however your participation in this research may benefit other people in the future by helping researchers learn more about financial aid processes.

HOW WILL MY CONFIDENTIALITY BE PROTECTED? Your privacy is very important to us. All of the information collected in this study will be treated confidentially. We will not ask for your name or connect it with your responses. Only group data will be published. To protect your privacy, only approved personnel will have access to the data. Survey data will be stored on a secure Temple University server. Study data may be used for future purposes.

WHOM SHOULD I CONTACT IF I HAVE QUESTIONS? You may ask any questions about the research at any time. If you have questions about the survey you should contact the Temple University Hope Center Research Director, Christine Baker-Smith by email at

christine.baker-smith@temple.edu. If you are not satisfied with the response of the research team, have more questions, or want to talk with someone about your rights as a research participant, you should contact the Education Research and Social/Behavioral Science IRB Office at IRB@temple.edu.

AGREEMENT TO PARTICIPATE IN THIS STUDY Your participation in this study is completely voluntary. If you decide not to participate or to withdraw, you may do so at any time by simply discontinuing the survey.

Q0 By continuing on to the survey, you certify that you are at least 18 years old and voluntarily consent to participate in this research study.

After Selecting the check box indicating your consent to the survey you will need to click on the arrow on the right hand side of the page to proceed to first question.

Continue to survey (1)

End of Block: Consent

Start of Block: Block 14

Q116 Thank you for taking this survey! As you answer the survey questions, please consider and tell us in your responses if/how your views may have changed since you took the survey the first time in late August.

Q00 Please tell us which institution you work at (this information is purely for analytic purposes. Individual answers will not be shared with your institution)

▼ El Paso Community College (1) ... San Jacinto Community College (6)

Q117 How long have you worked in financial aid?

0-1 Years (1)

1-2 Years (2)

3-5 Years (3)

6-10 Years (4)

11-15 Years (5)

16-20 Years (6)

20+ Years (7)

Q118 Did you attend the following webinars run by the Hope Center for College, Community, and Justice?

	Yes (1)	No (2)
Emergency aid webinar (1)	<input type="radio"/>	<input type="radio"/>
Benefits access for students webinar (2)	<input type="radio"/>	<input type="radio"/>

End of Block: Block 14

Start of Block: Financial Aid

Q000 First, we're going to ask you a few quick questions about Expected Family Contribution (EFC).



Q1 Could you manually calculate a student's Expected Family Contribution (EFC) using only the EFC formula worksheets from the Information for Financial Aid Professionals site (IFAP) with no other assistance?

- No (0)
 - Yes (1)
 - I'm not sure (2)
-

Q2 Thinking about a typical week, how often do you explain the definition of EFC to a student?

- Rarely (1-2 times per week) (1)
 - Occasionally (3-5 times per week) (2)
 - Frequently (5-10 times per week) (3)
 - Very frequently (more than 10 times per week) (4)
-

Q3 When advising students, how do you explain . . .

Q4 . . . how EFC helps determine a student's financial aid package?

Q5 . . . your institution's cost of attendance to a student?

Q6 . . . that their financial aid package will not cover all their costs if they are a \$0 EFC student?

Q7 When a student has unmet financial need what do you usually do to support that student?
 (Please select the supports you would use and arrange them in the order you would utilize those options, with 1 being your most frequently used support)

This is something I would use to support the student	This is not something I would use to support the student
_____ Refer them to private loan options (1)	_____ Refer them to private loan options (1)
_____ Suggest a parent PLUS loan (2)	_____ Suggest a parent PLUS loan (2)
_____ Refer them to scholarship search sites (3)	_____ Refer them to scholarship search sites (3)
_____ Refer them to Public benefits programs (4)	_____ Refer them to Public benefits programs (4)
_____ Provide financial literacy or budgeting resources (5)	_____ Provide financial literacy or budgeting resources (5)
_____ Suggest student attend part time (6)	_____ Suggest student attend part time (6)
_____ Suggest student consider different living arrangements (7)	_____ Suggest student consider different living arrangements (7)
_____ Provide them with information on emergency aid (8)	_____ Provide them with information on emergency aid (8)
_____ Nothing, I have no other options (9)	_____ Nothing, I have no other options (9)
_____ Other (please specify) (10)	_____ Other (please specify) (10)

Q119

Do you think that the appeals process for a Cost of Attendance adjustment at your institution is...

- too easy for students to request and get approved? (1)
- about the correct level of difficulty to request and get approved? (2)
- too hard for students to request and get approved? (3)

Display This Question:

If Q119 = too easy for students to request and get approved?

Q120 Why do you think the Cost of Attendance appeals process is too easy for students to request?

Display This Question:

If Q119 = about the correct level of difficulty to request and get approved?

Q121 Why do you think the Cost of Attendance appeals process is about the right difficulty level to request?

Display This Question:

If Q119 = too hard for students to request and get approved?

Q122 Why do you think the Cost of Attendance appeals process is too hard for students to request?

Q124

Do you think that the appeals process for a Dependency Override at your institution is...

- too easy for students to request and get approved? (1)
- about the correct level of difficulty to request and get approved? (2)
- too hard for students to request and get approved? (3)

Display This Question:

If Q124 = too easy for students to request and get approved?

Q125 Why do you think the Dependency Override appeals process is too easy for students to request?

Display This Question:

If Q124 = about the correct level of difficulty to request and get approved?

Q128 Why do you think the Dependency Override appeals process is about the right difficulty level to request?

Display This Question:

If Q124 = too hard for students to request and get approved?

Q129 Why do you think the Dependency Override appeals process is too hard for students to request?

End of Block: Financial Aid

Start of Block: Support mechanisms

Q8 The following question will present you with various support mechanisms your college may or may not have available to students.

For each support option presented, tell us whether your college offers it. You will then be asked some additional questions about each support mechanism that is offered at your college.

Q9 Does your institution offer the following programs or services for students?

	No (0)	Yes (1)	I'm not sure (2)
Enrollment assistance for public benefits access (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free public transit passes (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gas cards (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free tax preparation (6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free legal services (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emergency financial aid (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food pantry (7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Meal vouchers (8)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Grocery store gift cards (9)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emergency housing (10)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Subsidized childcare (11)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

End of Block: Support mechanisms

Start of Block: Support: Public benefits access

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q10 How knowledgeable do you feel about enrollment assistance for public benefits access?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q11 Do you feel comfortable referring students to enrollment assistance for public benefits access?

- Definitely not (6)
- Probably not (7)
- Might or might not (8)
- Probably yes (9)
- Definitely yes (10)

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q12 To what extent do you agree with the following statements about enrollment assistance for public benefits access?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The program
is new and I
have not
learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Enrollment assistance for public benefits access [Yes]

Q13 Is there anything else you would like to share with us about enrollment assistance for public benefits access at your institution?

End of Block: Support: Public benefits access

Start of Block: Support: Free public transit passes

Display This Question:

If Q9 = Free public transit passes [Yes]

Q14 How knowledgeable do you feel about free public transit passes offered at your institution?

- Not knowledgeable at all (1)
- Slightly knowledgeable (2)
- Moderately knowledgeable (3)
- Very knowledgeable (4)
- Extremely knowledgeable (5)

Display This Question:

If Q9 = Free public transit passes [Yes]

Q15 Do you feel comfortable referring a student to free public transit passes?

- Definitely not (1)
- Probably not (2)
- Might or might not (3)
- Probably yes (4)
- Definitely yes (5)

Display This Question:

If Q9 = Free public transit passes [Yes]

Q16 To what extent do you agree with the following statements about free public transit passes?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Display This Question:

If Q9 = Free public transit passes [Yes]

Q17 Is there anything else you would like to share with us about free public transit passes at your institution?

End of Block: Support: Free public transit passes

Start of Block: Support: Gas cards

Display This Question:

If Q9 = Gas cards [Yes]

Q18 How knowledgeable do you feel about gas cards provided to students?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Gas cards [Yes]

Q19 Do you feel comfortable referring a student to the program that provides gas cards?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Gas cards [Yes]

Q20 To what extent do you agree with the following statements about the program that provides gas cards?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Display This Question:

If Q9 = Gas cards [Yes]

Q21 Is there anything else you would like to share with us about gas cards?

End of Block: Support: Gas cards

Start of Block: Support: Free tax prep

Display This Question:

If Q9 = Free tax preparation [Yes]

Q22 How knowledgeable do you feel about free tax preparation offered to students?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Free tax preparation [Yes]

Q23 Do you feel comfortable referring students to free tax preparation?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Free tax preparation [Yes]

Q24 To what extent do you agree with the following statements about the program that provides free tax preparation?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Display This Question:

If Q9 = Free tax preparation [Yes]

Q25 Is there anything else you would like to share with us about free tax preparation at your institution?

End of Block: Support: Free tax prep

Start of Block: Support: Free legal services

Display This Question:

If Q9 = Free legal services [Yes]

Q26 How knowledgeable do you feel about free legal services?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Free legal services [Yes]

Q27 Do you feel comfortable referring students to free legal services?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Free legal services [Yes]

Q28 To what extent do you agree with the following statements about the program that provides free legal services?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Free legal services [Yes]

Q29 Is there anything else you would like to share with us about free legal services at your institution?

End of Block: Support: Free legal services

Start of Block: Support: Emergency financial aid

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q30 How knowledgeable do you feel about emergency financial aid?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q31 Do you feel comfortable referring students to emergency financial aid?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q32 To what extent do you agree with the following statements about emergency financial aid?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Emergency financial aid [Yes]

Q33 Is there anything else you would like to share with us about emergency financial aid?

End of Block: Support: Emergency financial aid

Start of Block: Support: Food pantry

Display This Question:

If Q9 = Food pantry [Yes]

Q34 How knowledgeable do you feel about the campus food pantry?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Food pantry [Yes]

Q35 Do you feel comfortable referring students to the campus food pantry?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Food pantry [Yes]

Q36 To what extent do you agree with the following statements about the campus food pantry?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:

If Q9 = Food pantry [Yes]

Q37 Is there anything else you would like to share with us about the campus food pantry?

End of Block: Support: Food pantry

Start of Block: Support: Meal vouchers

Display This Question:

If Q9 = Meal vouchers [Yes]

Q38 How knowledgeable do you feel about meal vouchers?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Meal vouchers [Yes]

Q39 Do you feel comfortable referring students to meal vouchers?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Meal vouchers [Yes]

Q40 To what extent do you agree with the following statements about meal vouchers?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not learned much	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

about it yet.

(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.

(7)

I am not sure
how the
program
would help a
student
referred to it.

(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many
referrals and

I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

Display This Question:
If Q9 = Meal vouchers [Yes]

Q41 Is there anything else you would like to tell us about meal vouchers?

End of Block: Support: Meal vouchers

Start of Block: Support: Grocery store gift cards

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q42 How knowledgeable do you feel about grocery store gift cards?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q43 Do you feel comfortable referring students to grocery store gift cards?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q44 To what extent do you agree with the following statements about the program that provides grocery store gift cards?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Display This Question:

If Q9 = Grocery store gift cards [Yes]

Q45 Is there anything else you would like to tell us about grocery store gift cards?

End of Block: Support: Grocery store gift cards

Start of Block: Support: Emergency housing

Display This Question:

If Q9 = Emergency housing [Yes]

Q46 How knowledgeable do you feel about emergency housing?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Emergency housing [Yes]

Q47 Do you feel comfortable referring students to emergency housing?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Emergency housing [Yes]

Q48 To what extent do you agree with the following statements about the program that provides emergency housing?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It part of my job to refer students to campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I have not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

learned much
about it yet.
(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.
(7)

I am not sure
how the
program
would help a
student
referred to it.
(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have
too many

referrals and
I do not want
to
overburden
them. (10)

I have been
told not to
refer students
to this
program.
(11)

I do not
believe this
is a support
we should
offer. (12)

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Display This Question:

If Q9 = Emergency housing [Yes]

Q49 Is there anything else you would like to tell us about emergency housing?

End of Block: Support: Emergency housing

Start of Block: Support: Subsidized childcare

Display This Question:

If Q9 = Subsidized childcare [Yes]

Q50 How knowledgeable do you feel about subsidized childcare?

- Not knowledgeable at all (1)
 - Slightly knowledgeable (2)
 - Moderately knowledgeable (3)
 - Very knowledgeable (4)
 - Extremely knowledgeable (5)
-

Display This Question:

If Q9 = Subsidized childcare [Yes]

Q51 Do you feel comfortable referring students to subsidized childcare?

- Definitely not (1)
 - Probably not (2)
 - Might or might not (3)
 - Probably yes (4)
 - Definitely yes (5)
-

Display This Question:

If Q9 = Subsidized childcare [Yes]

Q52 To what extent do you agree with the following statements about the program that provides subsidized childcare?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
It is part of my job to know about the program. (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have had the program explained to me. (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have been trained on who qualifies for the program. (3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is part of my job to refer students to other campus services like this one. (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The program is new and I	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

have not
learned much
about it yet.

(5)

The program
is new and I
am not sure
how to refer
students. (6)

I am worried
I might
offend a
student if I
refer them.

(7)

I am not sure
how the
program
would help a
student
referred to it.

(8)

Only certain
people can
refer students
and I am not
one of those
people. (9)

Students
already have

too many referrals and I do not want to overburden them. (10)

I have been told not to refer students to this program. (11)

I do not believe this is a support we should offer. (12)

Display This Question:

If Q9 = Subsidized childcare [Yes]

Q53 Is there anything else you would like to tell us about subsidized childcare?

End of Block: Support: Subsidized childcare

11.5. Appendix E. Project Leads Survey 3. Survey administered to all project leads

Start of Block: Block 1 - Consent

Q1 Research Participant Information and Consent Form

Title of the Study: The Real Price of College: Improving Estimates of "Demonstrated Financial Need"

Principal Investigator: Sara Goldrick-Rab DESCRIPTION OF THE RESEARCH The study is focused on creative ways of thinking about student financial need, different ways of calculating cost of attendance and whether we should allow for negative expected family contributions.

WHAT WILL MY PARTICIPATION INVOLVE? This survey will take approximately 15 minutes to complete. All information you provide will be kept private.

ARE THERE ANY RISKS TO ME? There are no risks to you by taking this survey. We will keep your responses confidential and stored on our secure server.

ARE THERE ANY BENEFITS TO ME? There are no direct benefits to participating in this study, however your participation in this research may benefit other people in the future by helping researchers learn more about financial aid processes.

HOW WILL MY CONFIDENTIALITY BE PROTECTED? Your privacy is very important to us. All of the information collected in this study will be treated confidentially. We will not ask for your name or connect it with your responses. Only group data will be published. To protect your privacy, only approved personnel will have access to the data. Survey data will be stored on a secure Temple University server. Study data may be used for future purposes.

WHOM SHOULD I CONTACT IF I HAVE QUESTIONS? You may ask any questions about the research at any time. If you have questions about the survey you should contact Christine Baker-Smith, the Executive Director of the Hope Center for College, Community,

and Justice at Temple University, by email at christine.baker-smith@temple.edu. If you are not satisfied with the response of the research team, have more questions, or want to talk with someone about your rights as a research participant, you should contact the Education Research and Social/Behavioral Science IRB Office at IRB@temple.edu.

AGREEMENT TO PARTICIPATE IN THIS STUDY Your participation in this study is completely voluntary. If you decide not to participate or to withdraw, you may do so at any time by simply discontinuing the survey.

Q2 By continuing on to the survey, you certify that you are at least 18 years old and voluntarily consent to participate in this research study.

Continue to survey (1)

End of Block: Block 1 - Consent

Start of Block: Block 3

Q3 Please tell us which institution you work at (this information is purely for analytic purposes. Individual answers will not be shared with your institution)

▼ El Paso Community College (1) ... San Jacinto Community College (6)

End of Block: Block 3

Start of Block: Block 2 - Questions

Q4 *As you answer the survey questions, please consider and tell us in your responses if/how your views may have changed since our virtual meeting in December.*

Q5 *First, we would like to know more about your perceptions of financial aid.*

Q6 What do you believe the concept of a student's "demonstrated financial need" should measure for the effective delivery of financial aid?

Q7 To what extent do you agree that the following current federal measures are accurate?

	Strongly disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
Demonstrated financial need (i.e., the difference between total college costs and the family's ability to pay) (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expected family contribution (EFC) (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q8 Please briefly explain the reason for your assessment of the accuracy of expected family contribution (EFC) in the previous question.

Q9 In your own words, describe what a “negative expected family contribution” is and briefly describe how a student might have one.

Do not use any other resources - just share your candid thoughts. If you don't know, please say so.

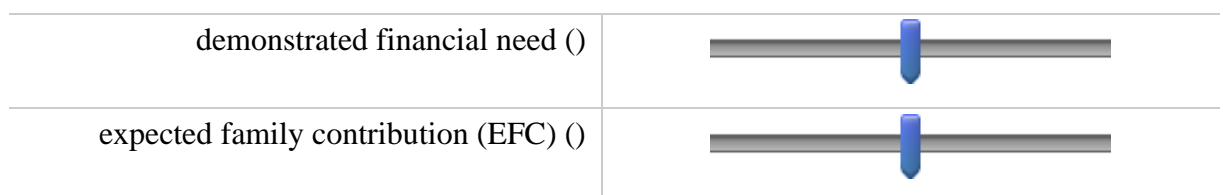
Q10 How confident are you that the answer you provided regarding "negative expected family contribution" is accurate?

- Not at all confident (1)
 - Somewhat confident (2)
 - Very confident (3)
-

Q11 To the best of your knowledge, about what percentage of your students are receiving completely accurate financial aid information from their stated...

No students Some students All students

0 10 20 30 40 50 60 70 80 90 100



End of Block: Block 2 - Questions

Start of Block: Questions added

Q12 *Lastly, we have some questions about your plans for engaging with the material we covered in our virtual meetin*

Q13 **How likely is it that your institution will use negative EFC information to direct support of any kind to students?**

- Very unlikely (1)
 - Somewhat unlikely (2)
 - Somewhat likely (3)
 - Very likely (4)
-

Q14 **How likely is it that your institution will inform students that their EFC underrepresents how much college will cost them?**

- Very unlikely (1)
- Somewhat unlikely (2)
- Somewhat likely (3)
- Very likely (4)

Display This Question:

If Q13 = Somewhat likely

Or Q13 = Very likely

Q15

What supports do you think you will direct to students based on negative EFC data?

Please select Yes or No for each.

	Yes (1)	No (2)
Emergency aid (1)	<input type="radio"/>	<input type="radio"/>
Institutional grants (2)	<input type="radio"/>	<input type="radio"/>
Information about public benefits (3)	<input type="radio"/>	<input type="radio"/>
Improved financial aid advising (4)	<input type="radio"/>	<input type="radio"/>
Financial literacy resources (5)	<input type="radio"/>	<input type="radio"/>

Display This Question:

If Q13 = Very unlikely

Or Q13 = Somewhat unlikely

Q16 Please tell us what support would be needed for you and your institution to use negative EFC information to direct supports to students.

Q17 How likely is it that you will share information about your students' negative EFCs with your frontline financial aid staff?

- Very unlikely (1)
- Somewhat unlikely (2)
- Somewhat likely (3)
- Very likely (4)

Display This Question:

If Q17 = Very unlikely

Or Q17 = Somewhat unlikely

Q18 Why do you think it is unlikely you will share students' negative EFC information with your front-line financial aid staff?

Display This Question:

If Q17 = Somewhat likely

Or Q17 = Very likely

Q19 Why do you think it is likely you will share students' negative EFC information with your front-line financial aid staff?

Q20 Will you use negative EFC data for any of the following?

Please choose Yes or No for each.

Yes (1)

No (3)

To educate staff and faculty
about student's financial
challenges (1)

To proactively provide
support and advice to
students with the greatest
financial need (2)

Fundraising (3)

Advocacy at the state and/or
federal level to inform
financial aid policy (4)

To inform or change
financial aid appeal policies
(5)

End of Block: Questions added