

YOUNG INVINCIBLES

NECESSARY BUT INSUFFICIENT: FEDERAL-STATE AFFORDABILITY PARTNERSHIPS MUST ALSO INCENTIVIZE COMPLETION

By Eve Rips
November 2017

Executive summary

Although a wide range of candidates and policy organizations have proposed federal-state partnerships to encourage state spending on higher education, these proposals have overwhelmingly focused on affordability alone rather than on a broader completion agenda. While affordability remains absolutely critical, we believe that the ultimate goal of federal-state partnership programs should be to increase overall student success rates, which requires looking both at affordability and at a larger set of completion-focused strategies. Here we recommend five tactics that could augment current proposals on affordability partnerships: early notification of eligibility, increased counseling access, increased access to consumer data, expanding student success initiatives, and building an inclusive access to aid. Each is intended to help bridge the gap between conversations about affordability and completion, and to emphasize an overall focus on student success.

younginvincibles.org  [/together.invincible](https://www.facebook.com/together.invincible)  [@younginvincible](https://twitter.com/younginvincible)

DC | CA | CO | IL | NY | TX



Introduction

Years of cuts to state funding for higher education have corresponded with skyrocketing tuition and student loan debt.ⁱ Today states are, on average, spending 16 percent less on higher education per student than they were before the Great Recession.ⁱⁱ Federal-state partnerships have the potential to reverse this trend. The core of the idea is a straightforward one: much like how the federal government encouraged states to construct new interstate highways through financial incentives, the federal government can also leverage its own funds to incentivize states to reinvest in their higher education systems. The idea is analogous to an employer encouraging staff to save for retirement by matching contributions, or a donor encouraging charitable giving by agreeing to match a portion of donations. The topic received an intense wave of attention during the 2016 election cycle, with candidates and major policy organizations putting out a wide range of proposals for how the federal government might encourage state investment.ⁱⁱⁱ As we look toward the 2018 midterms and the 2020 election cycle, we need to continue to build on this enthusiasm, and should take advantage of this moment to champion new, big ideas.

Plans for federal-state partnerships in higher education have typically focused on affordability, rather than on improving overall student success. While most proposals include student success metrics, they've tended not to emphasize specific tactics for improving student success rates. To an extent, this emphasis on affordability in federal-state partnerships makes sense: tying dollars to affordability is a particularly clean, easy way to structure incentives. Yet, while affordability is an absolutely critical component of increasing overall completion numbers, it's not enough on its own. A wide range of other barriers, such as limited access to advising, inadequate remedial support, and institutional failures to build inclusive environments, also directly impact student success. Ed Trust has published excellent analysis calling for greater focus on completion as part of state-federal partnership proposals. We agree. Dollars without added incentives to ensure student success aren't enough: we need to make sure students can actually use available aid dollars effectively, and to add quality assurances and incentives to encourage student success.



We also believe that there's value to outlining a platform of completion supports that remains neutral on the underlying affordability mechanism, and could therefore be added onto almost any existing affordability proposal to provide direct benefit to students. The bottom line goal of federal-state partnership programs should be to ensure that students from low and moderate-income families, and other underrepresented backgrounds, are able to enroll in *and complete* programs without taking on substantial debt. College completion has clear individual and societal benefits: individuals who complete four-year degrees earn more, are more likely to be employed, have higher asset income, pay more back in taxes, and have higher self-reported levels of happiness than their peers without college degrees. To make completion the priority, it's critical to include in any federal-state partnership proposal both direct financial support and additional consumer information and student completion supports.

Consequently, we recommend a series of ways a federal-state partnership on higher education could address some of the barriers beyond affordability that face underrepresented populations. Each of our ideas could be directly added onto the basic structure of most of the existing federal-state partnership proposals. Regardless of the structure for affordability incentives, all proposed models for federal-state partnership should include an additional emphasis on completion and student success. Each idea in our platform is intended to:

- 1) Make sure affordability is paired with student support and consumer information, under the assumption that affordability is necessary but not sufficient to increase overall attainment rates.
- 2) Be comparatively easy to add on to existing proposals.
- 3) Include a quantifiable structure of incentives where federal funding is tied to clear, measurable outcomes.
- 4) Include components that are feasible as a standalone federal grant program that could be adopted without a broader federal-state partnership, so that components of the platform could move even in the absence of a larger federal overhaul.
- 5) Include explicit equity goals and benchmarks.

Our platform includes ideas designed to make sure students have the information they need to succeed, including early notification of financial aid, increased



counselor access, and improved access to consumer information. It also includes proposals designed to increase completion rates for underrepresented populations by expanding student success initiatives. Finally, the platform prioritizes explicit inclusion of populations sometimes excluded from affordable higher education, including undocumented populations and individuals with nonviolent criminal convictions.

II. Overview of the landscape

In the wake of the Great Recession, state disinvestment continues to create challenges for public higher education. Today 49 states are spending less per student on higher education than they did before the Recession in 2008.^{iv} At the same time, annual tuition has risen by 35 percent since the 2007-2008 school year.^v The increase in tuition has only partially covered the lost revenue, leaving overall spending on higher education down, resulting in many states terminating faculty, closing campuses, and/or restricting course offerings.^{vi} Student debt levels are at a breaking point, and new solutions are critically needed.

In response, politicians and policy groups have turned to incentives as one possible solution. In the years between 2013 and 2016, several politicians, including President Obama, Hillary Clinton, and Bernie Sanders, and non-government organizations, including the Center for American Progress, New America Foundation, Demos, Ed Trust, and AASCU, all proposed possible systems for how the federal government could incentivize state spending on higher education.^{vii} Each of these proposals is explicitly aimed at reducing the costs of college for students from low- or moderate-income households. The different plans vary substantially in several ways: the specific funding formulas proposed, the types of institutions and students that would be covered, the outcomes requirements, and the “pay for” on covering new costs. For a more comprehensive account, New America Foundation’s “Strengthening the Partnership: A Survey of Proposed Federal Funding Solutions” provides an excellent and detailed overview.^{viii} Each of the proposals includes an explicit funding formula designed to guide specific decisions on affordability.^{ix} Although many of the proposals include completion metrics, none of the proposals, with the exception of Ed Trust’s, provide an in-



depth focus on specific tactics and supports beyond affordability that are designed to increase completion.^x

At the same time, states themselves are frequently focused principally on increasing overall completion rates. Currently, 29 states have set official attainment goals, most of which fall directly in line with Lumina's 60 percent by 2025 goal.^{xi} The clock is ticking fast on these goals - currently only 40 percent of adults in the US have a postsecondary credential, meaning that to meet the goal of having 60 percent of the workforce hold college credentials by 2025 nationally, an additional 16.4 million people would need to attain credentials in the next seven years.^{xii} Particularly worrisome are the disparate rates at which racial minorities, who are a growing proportion of the national workforce, attain credentials in comparison to their white counterparts. On-time graduation rates vary starkly by race, with 49.5 percent of black students and 55.0 percent of Hispanic students completing four-year degrees within six years, compared to 67.2 and 71.7 percent respectively for white and Asian American students.^{xiii}

Affordability is necessary but not sufficient to increase completion rates. In countries that have made higher education completely free, like Norway, the children of undereducated parents still complete college at much lower rates than their peers.^{xiv} Institutional shortcomings beyond cost also directly impact student success. States and institutions have a responsibility to build equitable and inclusive postsecondary environments that they often fail to meet. Students frequently don't receive the information they need to make fully-informed choices on their postsecondary options, and then often don't receive sufficient academic guidance and support once they've matriculated. Institutions frequently fail to tailor academic offerings to align with students' previous educational experiences and opportunities. A fully effective federal-state partnership should address critical barriers facing students from underrepresented backgrounds, including many of these state and institutional shortcomings.

III. Platform

As we begin to envision what the dialogue around higher education access will look like in the 2018 and 2020 election cycles, it's more critical than ever to build a baseline of shared priorities among groups and candidates, at both federal and



state levels, working to keep college accessible to low- and middle-income populations. To that end, we've built a platform intended to integrate both affordability and completion priorities, and to elevate the idea that affordability, while critical, is not all that matters when it comes to achieving completion goals. For the purposes of this proposal, we remain neutral on many of the questions major federal-state partnership proposals currently focus on: we provide no specific funding formula for overall affordability and no comprehensive outcomes metrics. Regardless of the decision candidates and groups make on the ideal funding formula and outcomes metrics, we encourage them to supplement their approach with additional supports designed to address many of the additional barriers that underrepresented students face to making informed financial decisions and succeeding.

To ensure that policies increase access and success for underrepresented populations, we recommend a direct requirement that all states applying for funding under any one of these five proposals must set explicit equity goals for closing completion gaps by race, and first-generation status. We also recommend requiring that states pair those goals with clear annual benchmarks for progress.

We acknowledge each of these proposals comes with a level of administrative complexity that proposals strictly focused on affordability do not. That said, this is a space where we believe the additional layer of complexity is justified in order to ensure equitable outcomes. Additional resources provided by the federal government should come with direct assurances that they will help increase student success. Unless a broader range of challenges are addressed, a federal incentive model will continue to perpetuate inequitable completion outcomes. The ideas in our platform are aimed at making affordability solutions stronger by marrying them to solutions designed to increase overall completion rates as well.

A. Early notification of eligibility

Early commitment programs ensure that students receive information about college affordability at a young age, and are an effective tool for boosting enrollment in Pell and other aid programs. They “create a compact between government and families aimed at reducing their anxiety and building trust, in turn inspiring behavioral changes.”^{xv} According to one analysis, early commitment



programs focused on intervention in eighth grade can increase Pell enrollment by as much as four percentage points by twelfth grade.^{xvi}

Congress enacted Vice President Biden’s Early Federal Pell Grant Commitment Demonstration Act as part of the 2008 HEA reauthorization, but the provision was never funded. More recently, Senator Debbie Stabenow and Representative Brenda Lawrence introduced the Early Pell Promise Act, which will guarantee two years of Pell Grants to qualifying middle school students.^{xvii}

Early notification programs benefit from federal and state collaboration, because it is critical to educate students early on both the full financial picture of how much college is likely to cost and how much federal and the state funding is available to help pay for it. Indeed, the Early Pell Promise Act already functions in part as a federal-state partnership, because it mandates that students receive information about both federal and state aid.^{xviii} No matter how federal-state higher education spending incentives are structured, the funding will be more effective at increasing equitable access for low-income populations if students and their families understand the complete picture of their affordability options early and can plan accordingly.

Proposed model: Tie any new federal-state partnership funding to making early notification of Pell eligibility mandatory. In order to apply, a state must commit to early notification going forward. States that do not currently have an early notification program in place can apply for a one-time grant to set up the initial infrastructure needed to make the program a success.

B. Increase access to quality counseling

Early notification programs are critical to creating an environment in which students of all backgrounds begin to think about college as an option and a path for their long term career success. In person counseling support is then a critical next step to fostering this culture, addressing questions about affordability, and demystifying the college search, entrance, and success process. Part of the challenge is that students frequently struggle throughout high school to receive accurate, timely information about applying for, paying for, and succeeding in



college. This is in large part due to a counselor shortage. The American School Counselor Association recommends a maximum ratio of 250 students to each counselor,^{xix} but nationally we average 471 students for every high school counselor.^{xx} As college enrollment and completion rates grow, it will be increasingly critical for students to have access to resources necessary to make informed financial decisions.

A federal-state partnership could help incentivize change through a number of mechanisms. First, a program could help in encouraging states to set student-to-counselor ratio targets and benchmarks, ensuring that all states that currently fall below the 250:1 ratio make incremental progress toward improving counselor access. In order to help states reach these ratios, federal funding could be used to help in the build out of the American Counseling Fellows program. Currently, National College Advising Corps runs a program that provides counseling fellows directly to schools, in a model analogous to Teach for America's approach. The program is designed to increase the number of low-income, first generation, and underrepresented students who enroll in and complete college.^{xxi} A counseling fellowship program would not replace highly trained, experienced counselors, but would function as a critical step toward reaching students at schools that are underserved.

Any federal-state partnership should also require states commit to providing increased training for both high school counselors and college financial aid administrators on the new affordability initiatives. This is essential to ensuring that the information students receive is consistently timely and accurate. This could be achieved by having all participating states either launch their own program or opt into the National Training for Counselors and Mentors program (NT4CM), a joint initiative of the National Association of Student Financial Aid Administrators, the Department of Education Office of Federal Student Aid, and the National Council of Higher Education Loan Programs.^{xxii} NT4CM already provides free publicity materials to promote state training and initiatives for participating states, and allows for training to be tailored to the specific curriculum needs of individual states.^{xxiii} This approach would allow the federal government to incentivize training while still providing states with the flexibility to shape their own systems.



Proposed model: For states with a student-to-counselor ratio that is over 400:1, mandate that a minimum portion of federal-state partnership funding be dedicated to increasing the number of counselors on the ground. For states with a student-to-counselor ratio between 250:1 and 399:1, provide states with a voluntary option to use a portion of federal-state partnership funding to increase access to counselors. Launch a federal grant opportunity to support states in starting counseling fellowship programs.

C. Improve data access

Funding for a federal-state partnership on college affordability and completion will be most effective if states are able to track and monitor the long-term benefits of college programs for the beneficiaries of aid, and if students are provided with the information they need to make informed decisions about their financial choices.

Federal grants have already proven to be an effective strategy to support states' creating longitudinal data systems. Over six rounds of funding, the National Center for Education Statistics has supported 47 states, DC, Puerto Rico, the Virgin Islands, and American Samoa^{xxiv} in building out design, development, implementation, and expansion of longitudinal data systems through its Statewide Longitudinal Data Systems Grant Program.^{xxv} These systems are incredibly important given the challenges presented by the Student Unit Record Ban, which restricts tracking critical information on jobs, salaries, and loan repayment rate at a national level.^{xxvi} Despite the success of these grants, 14 states still do not link their state's education system data with their workforce data, although six of those states have at least initial plans to do so in the years ahead.^{xxvii} One specific way workforce data is tracked is through state unemployment insurance systems, which collect employment and wage information, and which generally provide the best avenue to capture college outcomes. That means that for students in those states, it's difficult to get an accurate assessment of how their college choice will affect their prospective future earnings in their field of choice.



Federal-state partnerships on higher ed affordability provide a further opportunity to support buildout of comprehensive data systems, with an emphasis on measuring outcomes for beneficiaries of student aid. They also provide an opportunity to ensure that states provide longitudinal data in a consumer-friendly format that real students will actually use to make decisions. We support Ed Trust's proposal that states build out a consumer-facing tool that empowers students and their families to make informed financial choices by requiring states to create a return on investment (ROI) index score for all degree-granting programs statewide.^{xxviii} Young Invincibles' own Here to Career app, created in partnership with the Foundation for California Community Colleges and the Kellogg Foundation, provides longitudinal information for students in California about their expected earnings outcomes for different career pathways at different institutions. Students have shown high levels of engagement with the app, helping make the case that longitudinal data, when presented in an accessible format, can directly help students make informed college and career choices.

Even when comprehensive information is available, it can fail to help guide student decisions by being difficult to understand, or by not being widely publicized. We recommend expanding federal support for state consumer education by encouraging a rigorous focus-grouping process for new consumer tools, paired with a deliberate youth outreach campaign around the consumer information. This process will help ensure that consumer data is effectively serving a direct student need.

Proposed model: Expand grant funding to encourage states that have not yet linked their unemployment data with their education system data to do so, and mandate that all recipients of federal partnership funding provide and promote a consumer tool with high quality outcomes information that has been carefully focused-grouped and tested. States should also be encouraged to collect occupation information (the Standard Occupational Classification) in UI records, and to track out-of-state students through interstate data exchanges. Give states the option either to create their own tool or opt into a using a multi-state national tool that directly incorporates both local state data and national College Scorecard data.



D. Expand student success initiatives

Even if students receive all of the information they need in order to make informed decisions about affordable college pathways, low-income and underrepresented students face a broad range of barriers to success once they've matriculated. In response, individual institutions, states, and the federal government have launched a variety of different student success initiatives designed to provide a holistic range of services and supports to students. Some programs have proven more effective than others. Programs with a clear, demonstrated causal impact on student success include CUNY ASAP and Georgia State University's set of efforts around improving on-time completion rates at the institutional level.

The City University of New York (CUNY) first launched the Accelerated Study in Associate Programs (ASAP) model in Fall of 2007.^{xxix} ASAP provides a framework for addressing various barriers to community college student success simultaneously, by mandating a rigorous course schedule including early remedial coursework as needed, ensuring ongoing support from advisors and tutors, incorporating soft-skills training on topics including core study skills, and a providing mix of support on tuition costs and non-tuition costs including MetroCards and textbooks. ASAP has proven highly effective: the program has increased overall enrollment rates and almost doubled on-time completion.^{xxx}

Like CUNY, Georgia State has shown a drastic improvement in increasing on-time completion rates. In the last decade, the school has increased graduation rates by 22 percentage points, despite an overall decrease in spending per student.^{xxxi} This improvement has come on the heels of a set of internal changes that Georgia State made to directly increase student success. These changes included building a comprehensive data analysis and tracking system designed to identify the points where students struggle, and to provide immediate targeted notifications to student advisors in response; an overhaul of remedial coursework including a new focus on adaptive courseware; and the launch of a completion grant program which provides small-dollar tuition assistance to individuals within a few credits of completing a degree.^{xxxii}

Nationally, federal TRIO programs have provided groups of students across the country with supports throughout elementary and postsecondary education. TRIO encompasses a broad range of outreach and student service programs, including



Student Support Services, which awards grants to institutions to provide direct student supports including academic tutoring and counseling services, and Upward Bound, which is an early intervention program that prepares students from low-income and underrepresented backgrounds for postsecondary success.^{xxxiii}

National studies run by the Department of Education over a ten-year period suggest that TRIO programs are effective at increasing college enrollment and graduation rates.^{xxxiv} However, overall ability to analyze the effectiveness of TRIO is sharply limited by federal restrictions on randomized control trials for TRIO programs.^{xxxv}

For states to use federal dollars effectively, they need to ensure that low-income students can both afford to go to school and can succeed once they've enrolled. To do this, federal partnership dollars should also be used to incentivize the creation of effective, comprehensive, and data-driven student support programs to provide tutoring, counseling, and effective systems of remedial education.

Proposed model: Launch a supplementary competitive grant process to build state-level student success programs that pull from evidence-based models, mandate additional federal evaluation and research funding for student success programs, and remove the ban on randomized control testing of TRIO programs.

E. Mandate an inclusive approach to financial aid

Finally, all federal-state models should ensure that aid is able to reach populations often excluded from financial aid programs, including undocumented populations and individuals with non-violent convictions on their records. A new federal-state model provides an important opportunity to ensure that our vision for who can access higher education is inclusive and promotes access and completion for all. Roughly 65,000 undocumented young adults graduate from American high schools every year.^{xxxvi} Those students were guaranteed the right to free public K-12 education by the Supreme Court in 1982 in *Plyler v. Doe*. The Court held that state law severely disadvantaged undocumented children by denying them the right to a public education.^{xxxvii} In the years since, higher education has become increasingly critical to achieving financial security and tuition has skyrocketed, but



undocumented students have continued to be ineligible to receive all forms of federal financial aid.^{xxxviii} Not only do these young adults deserve an opportunity to succeed, it's also in our country's best economic interest to ensure that young immigrants aren't cut off from pathways necessary to achieve economic security.^{xxxix}

Individuals with nonviolent criminal records have similarly been excluded from access to affordable higher education. Young adults who are incarcerated have limited or no eligibility for federal student aid. Although many individuals qualify for aid again once they are released, individuals with drug convictions continue to be severely restricted in ability to access FAFSA funding.^{xi} This has a disparate impact on black students, because although there is no difference in rate of drug use between black and white populations, African Americans are arrested for drug crimes at three-to-four times the rate that their white peers are.^{xii} Cutting off financial aid to individuals with records is also counterproductive: it cuts off a path to full and successful reentry into society. Increasing college completion rates also contributes to reductions in violent crime rates and increases in overall public safety.^{xlii}

Support for undocumented students and students with criminal convictions is an area where the federal government has lagged behind the leadership of several states: today undocumented students remain ineligible for federal education benefits, but are eligible for access to in-state tuition in 16 states through state DREAM acts, and can access publicly-funded education grants in four states.^{xliii} Fifteen states and the District of Columbia provide state aid to students regardless of prior drug offenses.^{xliv}

The 2018 election cycle presents an opportunity to push for changes that ensure higher education financial aid for these underserved populations of students, giving the federal government the chance to follow the example already set by a number of states across the country. The federal government should reform its own approach to inclusion while simultaneously encouraging remaining states to build out their own inclusive policies.



Proposed model: Expand access to federal aid for undocumented populations and individuals with nonviolent convictions, and make it mandatory for all states applying for federal funding to allow undocumented populations and individuals with nonviolent convictions to qualify for state aid.

IV. Conclusion

With student debt now totaling over \$1.3 trillion nationally,^{xlv} and Millennials growing in their share of the electorate by 2018 and poised to surpass the Gen X vote by the 2020 election,^{xlvi} emphasis on how the federal government can support strategic and equitable investment in higher education will be an even more critical issue in future election cycles than it was in previous ones. As we begin to see a second wave of proposals from candidates and policy organizations on how affordability incentives could be structured, we encourage all parties to advance proposals that keep costs affordable while simultaneously considering the range of barriers beyond affordability that keep completion rates low and equity gaps persistently high. By addressing the day-to-day barriers that students from underrepresented backgrounds face in navigating their way through our higher education systems, candidates will ensure that their proposals meet the specific, concrete needs of real students on the ground.



End Notes

- ⁱ Michael Mitchell, Michael Leachman, and Kathleen Masterson, *A Lost Decade of Higher Education Funding*, (Washington, DC: Center for Budget and Policy Priorities, 2017), https://www.cbpp.org/sites/default/files/atoms/files/2017_higher_ed_8-22-17_final.pdf.
- ⁱⁱ *Ibid*, 2.
- ⁱⁱⁱ Ben Barrett, *Strengthening the Partnership: A Survey of Proposed Higher Education Funding Solutions*, (Washington, DC: New America Foundation, 2016), <https://static.newamerica.org/attachments/12980-strengthening-the-partnership/Strengthening-the-Partnership.ca12ff94e6ef44b6aa4b695624c9b2e3.pdf>.
- ^{iv} Michael Mitchell, Michael Leachman, and Kathleen Masterson, 2.
- ^v *Ibid*, 3.
- ^{vi} *Ibid*.
- ^{vii} See e.g., David Bergeron, Elizabeth Baylor, and Antoinette Flores, *A Great Recession, a Great Retreat A Call for a Public College Quality Compact*, (Washington, DC: Center for American Progress, 2014); Alexander Holt et. al., *Starting from Scratch: A New Federal and State Partnership in Higher Education* (Washington, DC: New America, 2016); Mark Huelsman, *The Affordable College Compact*, (New York, NY: Demos, 2014); Dannenberg and Voight; Daniel Hurley, Thomas Harnisch, and Barmak Nassirian, *A Proposed Federal Matching Program to Stop the Privatization of Public Higher Education*, (Washington, DC: American Association of State Colleges and Universities, 2014).
- ^{viii} Barrett.
- ^{ix} *Ibid*, 12.
- ^x *Ibid*.
- ^{xi} *States with Higher Education Attainment Goals* (Washington, DC: HCM Strategists, 2016), <http://strategylabs.luminafoundation.org/wp-content/uploads/2013/10/State-Attainment-Goals.pdf>.
- ^{xii} Lumina Foundation's, "Goal 2025," accessed August 17, 2017, https://www.luminafoundation.org/goal_2025.
- ^{xiii} Doug Shapiro, Afet Dunder, and Faye Huie, *Completing College: A National View of Student Completion Rates by Race and Ethnicity*, (Washington, DC: National Student Clearinghouse, 2017), 2, <https://nscresearchcenter.org/wp-content/uploads/Signature12-RaceEthnicity.pdf>.
- ^{xiv} Jon Marcus, *In Norway, Where College is Free, Children of Uneducated Parents Still Don't Go*, *Hechinger Report*, June 10, 2015, <http://hechingerreport.org/in-norway-where-college-is-free-children-of-uneducated-parents-still-dont-go/>.
- ^{xv} Robert Kelchen and Sara Goldrick-Rab, "Accelerating College Knowledge: A Fiscal Analysis of a Targeted Early Commitment Pell Grant Program," *The Journal of Higher Education*, 86:2 (2015), 200.
- ^{xvi} *Ibid*, 201.
- ^{xvii} Congresswoman Brenda Lawrence, "Rep. Brenda Lawrence Introduces Early Pell Promise Act," Feb. 2, 2016, <https://lawrence.house.gov/media-center/press-releases/rep-brenda-lawrence-introduces-early-pell-promise-act>.
- ^{xviii} Lawrence.
- ^{xix} *The School Counselor and Comprehensive School Counseling Programs* (Washington, DC: American School Counselor Association, revised 2017), https://www.schoolcounselor.org/asca/media/asca/PositionStatements/PS_ComprehensivePrograms.pdf.
- ^{xx} Allie Bidwell, "Lack of Funds Leave School Counselors Struggling to Find Balance," *US News and World Report*, Sept. 16, 2013, <http://www.usnews.com/news/articles/2013/09/16/lack-of-funds-leaves-school-counselors-struggling-to-find-balance>.
- ^{xxi} College Advising Corps, "Our Work," accessed August 17, 2017, <http://advisingcorps.org/our-work/>.
- ^{xxii} National Association of Student Financial Aid Administrators, "National Training for Counselors and Mentors," accessed Aug. 17, 2017, https://www.nasfaa.org/National_Training_for_Counselors_and_Mentors.



xxiii Ibid.

xxiv National Center for Education Statistics, “Grantee States,” accessed October 9, 2017, <https://nces.ed.gov/programs/slids/stateinfo.asp>.

xxv National Center for Education Statistics, “About the SLDS Grant Program,” accessed August 18, 2017, https://nces.ed.gov/programs/slids/about_SLDS.asp.

xxvi Student Agenda for Postsecondary Data Reform, (Washington, DC: Young Invincibles, 2016), <http://younginvincibles.org/wp-content/uploads/2017/04/Student-Agenda-Data-Reform.pdf>.

xxvii John Armstrong and Christina Whitfield, *The State of State Postsecondary Data Systems*, (Boulder, CO: State Higher Education Executive Officers Association, 2016), 10, http://www.sheeo.org/sites/default/files/publications/SHEEO_StrongFoundations2016_FINAL.pdf.

xxviii Dannenberg and Voight, 10, http://1k9gl1yevnfp2lpq1dhrqe17-wpengine.netdna-ssl.com/wp-content/uploads/2013/10/Doing_Away_With_Debt.pdf.

xxix Susan Scrivener et. al., *Doubling Graduation Rates: Three-Year Effects of CUNY’s Accelerated Study in Associate Programs (ASAP) for Developmental Education Students*, (New York, NY: MRDC, 2015), ix, http://www.mdr.org/sites/default/files/doubling_graduation_rates_fr.pdf.

xxx Ibid, iii.

xxxi Sophie Quinton, “Georgia State Improved its Graduation Rate by 22 Points in 10 Years,” *The Atlantic*, Sep. 23, 2013, <https://www.theatlantic.com/education/archive/2013/09/georgia-state-improved-its-graduation-rate-by-22-points-in-10-years/279909/>.

xxxii Ibid.

xxxiii National Studies Find TRIO Programs Effective at Increasing College Enrollment and Completion, (Washington, DC: The Pell Institute, 2009), http://www.pellinstitute.org/downloads/publications-Studies_Find_TRIO_Programs_Effective_May_2009.pdf.

xxxiv Ibid.

xxxv Andrew Kreighbaum, “Trump Budget Would Slash Student Aid and Research,” *Inside Higher Ed*, May 24, 2017, <https://www.insidehighered.com/news/2017/05/24/white-house-budget-includes-tens-billions-cuts-student-aid-and-research>.

xxxvi Zenen Jaimes Perez, *Removing Barriers for Undocumented Students* (Washington, DC: Center for American Progress, 2014), 1, <https://www.luminafoundation.org/files/resources/removing-barriers-for-undocumented-students.pdf>.

xxxvii *Plyler v. Doe*, 457 U.S. 202 (1982).

xxxviii Perez, 1.

xxxix Francisco Ortega, Ryan Edwards, and Philip E. Wolgin, *The Economic Benefits of Passing the DREAM Act*, (Washington, DC: Center for American Progress, 2017), <https://www.americanprogress.org/issues/immigration/reports/2017/09/18/439134/economic-benefits-passing-dream-act/>.

xl U.S. Department of Education Federal Student Aid, “Students with Criminal Convictions Have Limited Eligibility for Federal Student Aid,” accessed Oct. 20, 2017, <https://studentaid.ed.gov/sa/eligibility/criminal-convictions>.

xli Christopher Nellum and Tom Allison, *Race & Ethnicity as a Barrier to Opportunity: A Blueprint for Higher Education Equity*, (Washington, DC: Young Invincibles, 2017), 23, <http://younginvincibles.org/wp-content/uploads/2017/05/Higher-Education-Equity.pdf>.

xlii Ava Page et. al., *Education and Public Safety*, (Washington, DC: Justice Policy Institute, 2007), http://www.justicepolicy.org/images/upload/07-08_rep_educationandpublicsafety_ps-ac.pdf.

xliii Perez, 1.

xliv Chris Mulligan et. al., *Falling Through the Cracks: Loss of State-Based Financial Aid Eligibility for Students Affected by the Federal Higher Education Act Drug Provision*, (Washington, DC Coalition for Higher Education Act Reform, 2006), <http://www.raiseyourvoice.com/statereport/fallingthrough.pdf>, 9.



^{xlv} Federal Reserve Bank of New York, Center for Microeconomic Data, "Household Debt & Credit Report," Q2 2017, <https://www.newyorkfed.org/microeconomics/hhdc/background.html>.

^{xlvi} Richard Fry, Millennials and GenXers Outvoted Boomers and Other Generations in 2016 Election, *Fact Tank* (Washington, DC: Pew Research Center), July 31, 2017, <http://www.pewresearch.org/fact-tank/2017/07/31/millennials-and-gen-xers-outvoted-boomers-and-older-generations-in-2016-election/>.