



March 2, 2021

The Honorable Dr. Miguel Cardona
U.S. Secretary of Education
400 Maryland Ave, S.W.
Washington, D.C. 20202

Dear Secretary Cardona,

The National College Attainment Network (NCAN) writes to congratulate you on your appointment as U.S. Secretary of Education and to provide recommendations for action by your Department of Education and policies requiring legislation for your support.

NCAN supports the immediate actions of the Biden-Harris administration regarding student loan repayment and interest freeze as well as supporting the Deferred Action for Childhood Arrivals (DACA) program. A lack of access to federal financial aid is a significant barrier to Dreamer students.

While additional pandemic response is needed for postsecondary students, it is also time to simultaneously look at solutions that support both problems created by the pandemic and those that were here before and will last beyond the current crisis. First and foremost, on this list is college affordability, where NCAN strongly encourages you to support President Biden's campaign commitment to the Double the Pell Grant. Further, as outlined in the joint [letter](#) from NCAN and the National Association Student Financial Aid Administrators, we urge your leadership and prioritization of the implementation of laws passed to simplify the Free Application for Federal Student Aid (FAFSA). Simplifying this process allows students to access federal student aid.

Our members know firsthand why this historic investment in the foundation of the nation's need-based aid program is necessary. NCAN over 500 affiliates serve as a critical resource for over 2 million students nationwide and are here as a resource to you and your Department on the complications of the college-going process, impact of the college affordability crisis, and the student experience. Our college access and success programs work in communities across the country to close equity gaps – of over 20 percentage points by race and income – in postsecondary attainment.

The college affordability crisis fuels a large portion of these attainment gaps. NCAN's "[Growing Gap](#)" research finding that only 25% of public, four-year institutions and fewer than half of public, two-year institutions are affordable to the average Pell grant recipient. This one-two punch of inequity and lack of affordability, exacerbated by family income losses due to the COVID global pandemic, make federal student aid all the more important.

NCAN strongly supports doubling the maximum Pell grant as the most crucial step toward closing equity gaps. Doubling the maximum award addresses equity gaps by targeting the college affordability crisis, experienced by all students from low-income backgrounds and disproportionately by students of color.

And in order for students to access these funds, the Biden-Harris administration under your direction of Secretary of Education must successfully implement the FUTURE Act of 2019 and the FAFSA Simplification Act included in the Consolidated Appropriations Act, 2021. The process to implement these changes will take time and resources.

As the higher education team gets to work in these early weeks of the administration and beyond, we welcome the opportunity to discuss any of these recommendations with you or to connect you with students and families and our advisers working with them around the country.

For more information, please contact: Carrie Warick, Director of Policy and Advocacy, NCAN, at 202-347-4848 ext. 203, warickc@ncan.org or @CarrieWarick on Twitter.

Sincerely,



Executive Director, NCAN

Further Executive/Administrative Action to Immediately Serve Students

The following actions are all items that the Biden-Harris administration can implement to immediately serve students from low-income backgrounds and students of color to work towards closing equity gaps in college attainment.

Timely Implementation of FAFSA Simplification

Congress passed the FUTURE Act in December 2019 and included FAFSA Simplification in the Consolidated Appropriations Act of 2021. The combination of these laws streamlines and simplifies the FAFSA form, helping an estimated 500,000 more students access the Pell Grant. The Office of Federal Student Aid is now tasked with operationalizing this FAFSA overhaul to enable data-sharing with the Internal Revenue Service and to trim the form from 108 to 36 questions. We urge the administration to prioritize and support the systems needed to meet the statutory deadline of July 1, 2023, which is the FAFSA season opening Oct 1, 2022.

FAFSA Adjustments for Pandemic-induced Economic Downturn

High school seniors from low-income backgrounds who fill out the FAFSA are three times as likely to continue their education beyond high-school as those who do not. Unfortunately, FAFSA applications are [down 12.3%](#) through the end of 2020.

NCAN understands that changing the FAFSA mid-cycle is incredibly difficult. The below recommendations will have high impact if implemented for the AY22-23. The FAFSA that year will open on October 1, 2021, and is currently under development so the window to make changes for this fall is imminent.

1. Use Secretarial authority to remove Selective Service, drug offense questions

As part of the Consolidated Appropriations Act of 2021, Congress passed comprehensive FAFSA Simplification reform. While the statutory date for implementation is for the AY23-24, the new law grants the Secretary of Education permission to implement two FAFSA changes earlier: the provision restricting those convicted of a drug offense while receiving federal student aid from receiving additional aid in the future and the requirement that eligible FAFSA filers have registered for Selected Service. NCAN strongly recommends that the Secretary use his authority to act early on these two items and remove them for the AY22-23 FAFSA that opens on Oct 1, 2021.

2. Add a check box to FAFSA for changed circumstances

Adding a check box to the FAFSA that would allow students to self-select notifying financial aid offices of a change in financial circumstances from the information submitted on their prior-prior year tax return would provide immediate benefit. Financial aid administrators would be able to proactively reach out to students rather than waiting for them to request professional judgment, and students would receive the message that their changing situation can be taken into account when applying for financial aid. Implementing these changes for the AY22-23 will still be highly relevant to pandemic response given the prior-prior tax year for that FAFSA is 2020.

3. *Create FAFSA signature upload option*

Students are currently completing the FAFSA away from the regular support structures of their high school, college, or college access program. For students whose parents are not eligible to obtain an FSA ID, the challenges are even greater. An FSA ID is required to electronically sign your FAFSA. Students with undocumented parents currently must print and mail the signature page. This poses a problem for many low-income families as they frequently do not have access to a printer. Adding an option to either upload a signature image or to use a touch-screen phone signature would greatly ease the FAFSA filing for these students.

FAFSA Verification

Current U.S. Department of Education (ED) regulations require the verification of the information submitted by a portion of FAFSA filers. Federal student aid currently targets 18% of filers for this audit-like process, but in past years has averaged well over 30% of filers. Roughly half of all filers eligible for a Pell Grant are flagged for verification (contrast this with the fact that the IRS audits less than 1% of all tax filers with income up to \$500,000) and students of color are [disproportionately targeted](#) for the process.

1. *Extend verification relief*

Currently, institutions are permitted to accept alternate documentation to ease the verification process during the pandemic. This includes accepting a signed tax return instead of a tax transcript and accept a signed letter of non-tax filing rather than the non-tax filer form 4506-T. NCAN recommends that these relief actions should be extended until the full implementation of the FUTURE Act. Further, Federal Student Aid should actively promote via an Electronic Announcement their use at institutions, many of which use these as options as last resort rather than the default choice for students going through the verification process.

2. *Continued adjustment to better target and lower verification selection percentage*

For the first four quarters of the 2019-20 FAFSA filing cycle, over [70% of students](#) who completed verification saw no change in their EFC. That number jumps to [9 out of 10](#) for students who filed the FAFSA and received an auto-zero EFC designation. NCAN recommends that no more than 15% of FAFSA filers be flagged for [verification](#) and that those who are selected are targeted among filers with characteristics historically shown to have the biggest shifts in EFC. NCAN further recommends that students who qualify for the auto-zero EFC qualification should not be targeted for financial verification.

Provide Economic Relief via Program Coordination and Outreach

By [Executive Order](#), President Biden called for all agencies to increase access and reduce barriers to reduce the impact of the economic crisis, including improving program coordination. Strong examples to increase access and reduce barriers on already funded programs that serve postsecondary students are below.

1. Message Professional Judgment option to all FAFSA filers

Professional judgment is a little-known option for students to be considered for more financial aid when their circumstances change following the tax year data used for the FAFSA form. NCAN recommends that Federal Student Aid email or text all FAFSA filers to make them aware of this option.

2. Message zero EFC students about SNAP eligibility changes

Higher education students with a zero dollar Expected Family Contribution should receive communications from Federal State Aid, their institution, or both, to make them aware of the new eligibility for this basic needs support.

3. Message Pell grant recipients about eligibility for Emergency Broadband Benefit (EBB) and streamline the application process

Federal Student Aid should message Pell Grant recipients of their ability to apply for the Emergency Broadband Benefit based on their grant receipt. Further, the Federal Communications Commission (FCC) should work with FSA to develop a data sharing agreement to confirm Pell grant receipt for applicants. In order to provide access to this important benefit while the data sharing system is being developed, the FCC should also accept alternate documentation of Pell Grant receipt such as the Student Aid Report (SAR) or a financial aid offer.

AmeriCorps

AmeriCorps is a key partner of the college access and success field with over 70 NCAN member organizations participating in the AmeriCorps program to secure near peer mentors or other key staff to deliver or support direct service to students.

1. Continue AmeriCorps flexibility

Currently, AmeriCorps volunteers are being granted flexibility over how many hours they volunteer and the time period over which they volunteer. As remote work and school continue to be a necessity, these flexibilities should be extended for the remainder of the national emergency.

Support for DACA and DREAMer Students

NCAN believes students of all immigration statuses, including those participating in or eligible for DACA, deserve support in their pursuit of higher education.

1. Include DACA and DREAMer students in any additional COVID relief aid

NCAN recommends that DACA and Dreamer students be eligible for COVID relief aid. This includes administrative action to confirm these students are eligible for the emergency student aid passed as part of the Consolidated Appropriations Act of 2021, and ensuring any future legislative packages are interpreted to include their eligibility.

2. Develop an Experimental Site to grant aid eligibility for Dreamer students

While Congressional action is required to change aid eligibility requirements to allow all DACA recipients and Dreamers to receive federal student aid, NCAN recommends that a financial aid experimental site be established to test this possible expansion of student aid while Congress considers changing the law. The Secretary of Education could do so without an executive action from the President, but doing so through an executive action would elevate this important issue. This experimental site would provide DACA recipients and Dreamers at participating institutions eligibility to apply for the Pell Grant. Similar to the Second Chance Pell program, the success of this ex-site could build broader support for granting access for these students.

Recommendations for Immediate Legislative Action

The following proposals are long-term investments in postsecondary students and should be considered as part of the President's budget proposal and any relevant legislative proposals such as FY22 budget reconciliation or appropriations, or Higher Education Act reauthorization.

Double the Maximum Pell Grant

NCAN recommends that the maximum award should be doubled, which will increase both aid for those currently eligible as well as expand eligibility to those who currently are not eligible, but still struggle to afford college. This proposal aligns with the Democratic Party platform and President Biden's campaign plan for higher education.

While Congress has grown the Pell Grant through a combination of inflationary and other increases in recent years, it is still dramatically short of its historical high in terms of purchasing power. The Pell increase for the maximum award from \$6,195 to \$6,345 for AY21-22 will cover a regular inflationary adjustment. Today, the maximum grant award [covers](#) less than 30% of the cost of attending a four-year public institution when at its peak, it covered approximately 75%.

Further, at least a [dozen states](#) have made significant cuts to higher education, and many more are in a tenuous funding situation for 2021. Combined with falling revenues and increased Medicaid costs, broad state cuts – similar to the Great Recession – are likely. Lower state investment will make college even more unaffordable during a time of economic turmoil. Unfortunately, NCAN's Affordability [research](#) demonstrates that even before the COVID-19 pandemic began, college was unaffordable for students receiving the average Pell grant award at 75% of public, bachelor's degrees institutions as well as for students at nearly half of community colleges.

To close the equity gaps in college attainment, college affordability must be addressed. Doubling the Pell grant should be the first step in addressing this crisis because it is targeted to the students who are most in need and can be used regardless of state action on higher education. When the maximum Pell Grant award is doubled, it should also be tied to inflation so that this issue does not need to be continually revisited.

Establish a Federal-State Partnership

Fewer than [25%](#) of public bachelor's degree institutions are affordable for the average Pell grant recipient. For this reason, NCAN recommends that the next President incentivize states to increase their investment in their public systems of higher education by offering matching funding that requires investment in reducing the cost of college. Further, a generous increase in the Pell grant investment must be coupled with this type of state investment so that states don't see the Pell Grant funding as a reason to further divest, pushing the cost of college disproportionately higher as compared to inflation. This investment must also be designed to respond to the counter-cyclical nature of the cost of higher education, where need is higher during economic downturns.

Extend Pell Eligibility to DACA/Dreamers

All students regardless of their race, ethnicity, or immigration status deserve the opportunity for an affordable higher education. Congress should allow DACA recipients and Dreamers to participate in the Pell Grant program if they are otherwise eligible upon FAFSA completion.