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# Promising Partnerships: Supporting College Student Success Through Collaboration Between Basic Needs and Financial Aid Offices



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## ACKNOWLEDGMENTS

Authored by Laura Szabo-Kubitz with support from Debbie Raucher, this report is intended to be a resource for institutions of higher education across California—and nationally—that seek to enhance collaboration between basic needs and financial aid offices to best serve students. The authors would like to thank the representatives of California State University San Marcos; Glendale Community College; Long Beach City College; Los Angeles Pierce College; Mt. San Antonio College; Stanislaus State; University of California, Berkeley; University of California, Irvine; University of California, San Francisco; University of California, Santa Barbara; and the three public higher education system offices who shared the promising practices they employ to support students, as well as the many higher education experts who took the time to review this report and provide feedback. The perspectives presented in this report represent those of the authors and do not necessarily reflect the views or opinions of the contributors and reviewers.

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# INTRODUCTION

## BACKGROUND

Institutions of higher education in California serve over three million undergraduate students, with the vast majority (84 percent)—including most students with low incomes and students of color—attending public colleges and universities.<sup>1</sup> At the state’s public institutions, many students with lower incomes have their tuition and fees paid by the Community College Promise Grant, state Cal Grants, or institutional financial aid; however these students struggle to cover non-tuition expenses essential to attending college such as living costs, transportation, books and supplies, and child or dependent care.

Due to rising costs and insufficient financial aid, many of these students face substantial affordability challenges that impact their ability to even meet their basic needs such as food, housing, transportation, access to health and dependent care, and technology. An issue brief from the **California Higher Education Basic Needs Alliance (CHEBNA)** highlighted startling statistics, with students across all three public higher education segments experiencing food and housing insecurity and homelessness, including 50 percent of California Community College (CCC) students, 42 percent of California State University (CSU) students, and 44 percent of University of California (UC) undergraduates reporting food insecurity.<sup>2</sup>

According to a 2022 analysis by The Institute for College Access & Success (TICAS), California college students with low incomes face substantial out-of-pocket costs across all three public higher education segments even after utilizing available grant aid.<sup>3</sup> These financial burdens are the greatest for families with the lowest incomes who must put the largest share of their family income towards covering remaining costs. In fact, students in the lowest income bracket attending CSU and



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CCC campuses must commit about half of their yearly family income to covering these net costs. To fill the affordability gap, students may turn to borrowing money, working excessively, reducing their enrollment intensity, or going without adequate housing, food, and other basic needs.<sup>4</sup> While the long-term impacts of the COVID-19 pandemic are still being investigated, student surveys have indicated that it has exacerbated the financial struggles and instability already faced by many college students, particularly those who are under-resourced and systemically marginalized.<sup>5</sup>

College financial aid offices play a crucial role in connecting students to the institutional, state, and federal funds that support their college enrollment and persistence, and administrators work hard to get them the financial aid for which they are eligible. However, even when maximized, financial aid is often not sufficient in supporting students’ total costs. Existing categorical programs such as California Work Opportunity and Responsibility to Kids (CalWORKs), Cooperative Agencies Resources for Education (CARE), Educational Opportunity

Program (EOP), Extended Opportunity Programs and Services (EOPS), NextUP, and others have helped to fill gaps for some students, however, these programs carry restrictions that make them inaccessible to some students. More recently, basic needs centers have emerged to fill remaining gaps more broadly by providing all students with access to additional resources as well as acting as safe spaces for students to seek comprehensive support when facing personal, academic, and financial challenges.

Students often face barriers accessing available financial aid as well, whether because of lack of information and support prior to entering college, the complexity of navigating the application process, insufficient support for completing the process including verification, or because eligibility requirements such as Satisfactory Academic Progress (SAP) or limitations based on the stated cost of attendance prevent access to needed financial resources.

**This report seeks to highlight opportunities for enhanced collaboration and coordination across financial aid and basic needs offices to better support college students in accessing the resources they need to succeed.**

Strengthened partnership between financial aid offices and basic needs centers helps support college students in accessing the resources they need to succeed. However, little has been documented about the intersection of the work of financial aid and that of basic needs. This report seeks to fill that void by detailing opportunities for enhanced collaboration and coordination between these entities.





## STATEWIDE AND SYSTEMWIDE EFFORTS

In 2017, Governor Jerry Brown and the California State Legislature made a groundbreaking move to address basic needs on college campuses, allocating \$7.5 million of state funding in support of Hunger-Free College Campuses, an initiative to provide incentives to public colleges and universities in California to address college student hunger. This was followed by additional one-time funding allocations in subsequent years focused on reducing college students’ food insecurity. These investments prompted some institutions to move beyond addressing hunger to creating initiatives that focused on supporting student basic needs more broadly, leading to additional state investments.

In 2021, the California State Legislature and Governor Gavin Newsom expanded their commitment to this issue by allocating historic ongoing funding across all three public higher education segments targeted at alleviating basic needs insecurity. This was further augmented through investments in the 2022–23 state budget. Current funding levels include \$40 million for CCCs, \$25 million for CSUs, and \$15

**Recommendations from the California Intersegmental Working Group on Student Basic Needs include ensuring that emergency assistance does not negatively impact students’ financial aid packages, encouraging financial aid offices to proactively use Professional Judgment to adjust student budgets when a special circumstance exists, and better leveraging public benefits.**

million for UCs. Statutory language linked to the funding for the community college system includes a requirement that basic needs centers coordinate with campus financial aid offices to ensure students are receiving all the aid for which they are eligible.<sup>6</sup>

In 2021, the Governor’s Council for Post-Secondary Education convened the **California Intersegmental Working Group on Student Basic Needs** to identify recommendations to better support college students, which they laid out in their subsequent report, *The Opportunity to Strengthen Basic Needs Supports for California’s Post-Secondary Students through Partnership and Shared Accountability*.<sup>7</sup> The recommendations describe how colleges and higher education segments can increase access to basic needs supports and reduce student burdens, including by ensuring that emergency assistance

### Basic Needs Allocation by California Public Higher Education System

ACADEMIC YEAR	CCC	CSU	UC
2017/2018	\$2.5 million	\$2.5 million	\$2.5 million
2018/2019	\$10 million	\$1.5 million	\$1.5 million
2019/2020	\$3.9 million	\$15 million	\$15 million (ongoing)
2020/2021	none	none	\$15 million (ongoing)
2021/2022	\$30 million (ongoing) + \$100 million (one-time)	\$15 million (ongoing)	\$15 million (ongoing)
2022/2023	\$40 million (ongoing)	\$25 million (ongoing)	\$15 million (ongoing)

does not negatively impact students' financial aid packages, and encouraging financial aid offices to proactively use Professional Judgment to adjust student budgets when a special circumstance exists. The report also recommends creating centralized systems—promoted by college financial aid and basic needs staff—through which students can access federal and state resources including financial aid and public benefits like CalFresh, housing programs, and subsidized child care.

To further their understanding of how basic needs and financial aid offices can leverage one another, in early 2023 the **CCC Chancellor's Office** launched a two-year community of practice where five participating colleges will learn and work with experts on designing equity-focused best practices for basic needs and financial aid collaboration. In addition to receiving grants to support local design and implementation efforts, participants will have access to professional development and technical assistance, the opportunity to partner with colleagues across the state engaging in similar work, and support with developing a Basic Needs and Financial Aid Integration, Innovation, and Effectiveness Plan.



The CSU and UC systems are also committed to creating robust infrastructure that supports student success and have implemented Basic Needs Initiatives.<sup>8</sup> Both have dedicated basic needs staff; the **CSU Chancellor's Office**, for example, has a systemwide basic needs director who convenes campus basic needs centers monthly to discuss priorities and issues they are facing. Extensive academic research from CSU professors Dr. Rashida Crutchfield and Dr. Jen Maguire examines students' basic needs experiences and the policies and programs that impact them. Their research has highlighted the intersection of basic needs and financial aid including that “the majority of students who experienced food insecurity, homelessness, or both reported that their financial aid package did not cover all of their living expenses,” and that “fluid linkage with financial aid administrators can support early identification of basic needs insecure students.”<sup>9</sup>

The UC System also sponsors a comprehensive basic needs initiative focused on creating a systemwide safety net.<sup>10</sup> As discussed in more detail in promising practice #1 of this report (*Ensure System and Campus Leaders Are Proactively Fostering a Collaborative and Student-Centered Culture*), the **UC Office of the President (UCOP)** has recently issued guidance on how various funding sources, including basic needs and financial aid, can work together to support students' diverse needs. The UC System also chairs **CHEBNA**, which includes leaders across the three public higher education segments who meet regularly to help shape policies and review proposed legislation. CHEBNA also brings members of the community together through meetings and webinars that include information about financial aid to learn about issues impacting students.<sup>11</sup>

# PROMISING PRACTICES

To successfully complete a higher education credential, students need to be able to afford their basic living expenses. This includes safe and reliable housing, nourishing food, adequate supplies including consistent access to technology, and dependent care, as well as access to multiple supports including mental and physical health care and academic counseling. To best support college students' ability to afford and succeed in college, financial aid offices and basic needs centers can work together to ensure students receive all the resources for which they are eligible, including access to financial aid, public benefits, and existing campus-based categorical programs, when they need them.

Between Summer 2022 and Winter 2023, the primary author of this report conducted interviews with basic needs and financial aid administrators and staff from colleges and universities across California's three public higher education segments, including representatives from their system offices (See Appendix for a list of participating institutions). While not exhaustive of successful approaches that colleges and universities throughout the state may be taking, this report uplifts from these conversations promising practices for collaboration between basic needs and financial aid offices at four California Community Colleges, two California State University campuses, and four University of California campuses, as well as strategies shared by the segments' system offices. Moreover, many institutions beyond those highlighted in this report have made significant strides towards improved collaboration to address student basic needs. It is the authors' hope, however, that even those institutions that have been diligently working towards these goals also operate under a framework of continuous quality improvement and can find ways based on the information shared in this report to move the needle even further.

**Support from system and campus leadership is key to facilitating collaboration and a shared student-centered mission which, in turn, is central to ensuring students' needs are sufficiently met.**

The following are several no- and low-cost promising practices employed by colleges and universities throughout California that can be replicated to facilitate the financial aid and basic needs partnerships so critical to supporting college students who are underserved and systemically marginalized—and pave the way for their success. While implementing the recommendations below may require an upfront investment of staff time, that investment can pay long-term dividends in streamlined processes and improved student outcomes that are likely aligned with many institutions' existing vision and goals.

## **1 Ensure System and Campus Leaders Are Proactively Fostering a Collaborative and Student-Centered Culture**

Support from system and campus leadership is key to facilitating collaboration and a shared student-centered mission throughout the college which, in turn, is central to ensuring students' needs are sufficiently met. This can be generated when financial aid and basic needs staff regularly communicate with administrative leadership about their programs and the barriers students face; leadership proactively works to build and propagate a student-focused, collaborative culture that permeates their colleges; and when all work together to identify and remove structural and procedural roadblocks that students encounter when accessing financial aid and other resources.



It is important that unnecessarily punitive administrative policies, which place an undue burden on students facing the greatest challenges and contribute to existing inequities in California’s post-secondary systems, are repealed.

Institutional and system-level leadership impacts how individual colleges serve students, in some cases by helping to facilitate a student-first culture and in others by thwarting flexibility and creativity. An example of an equity-minded approach is found at **Los Angeles Pierce College (Pierce College)**, where staff feel empowered by leadership who encourage collaboration among departments, which often work together on initiatives and projects. For example, the college’s financial aid liaison presents at various events that the Brahma Bodega (Pierce College’s basic needs program) hosts to answer students’ questions and provide them with materials that may be helpful to them. This leadership-supported integration also allows staff to learn about other student support services on campus, enabling them to better direct students facing particular challenges, and creating a stronger sense of partnership and cohesion throughout the college.

At **CSU San Marcos (CSUSM)**, financial aid and basic needs have a robust partnership, in great part because of the warm working relationship between the directors of financial aid and the Cougar Care Network, which supports students facing basic needs crises. Both share a philosophy that centers students’ needs and the directors regularly problem solve to identify funds to assist students facing severe hardship. Similarly, when new student funding becomes available, the financial aid office works with the Cougar Care Network to identify students who would most benefit.

At **UC Berkeley (UCB)**, a culture of student services driven by shared values has supported collaboration among staff. The financial aid office sees the supports provided by the basic needs office as

complementary to the work they do to serve students, and promotes its relationship with basic needs, including on its website:

*“THE FINANCIAL AID & SCHOLARSHIPS OFFICE works closely with the [Basic Needs Center](#)—we work in partnership to support students and we have two dedicated Basic Needs Financial Aid Counselors to that end. In partnership, our two offices have one streamlined application and awarding process for students who need emergency funding for rent, housing security deposits, food, medical and mental health expenses, and technology. Learn more and apply at [the Holistic Fund Overview](#).”<sup>12</sup>*

The offices collaborate on both prevention and emergency response programming, with their respective roles complementing one another and allowing for holistic support and care of the students served. The basic needs financial aid counselors, who are housed in the Financial Aid & Scholarships Office but are funded by the Basic Needs Center, provide financial aid counseling and administration of student awards through the Basic Needs Emergency Fund, while the Basic Needs Care Team provides crisis intervention and case management support, connecting students to on- and off-campus resources and services.

In contrast, some colleges take an approach that is rooted in the perception that staff’s role is to be the gatekeepers of funds—at times driven by a scarcity-of-resources mindset—which instead shifts the focus away from students and creates unnecessary barriers. At a minimum, it is important that unnecessarily punitive administrative policies—such as putting holds on financial aid if a student

has an unpaid balance from an overdue library book and other policies created in the name of holding students accountable—are repealed. Such policies place an undue burden on students facing the greatest challenges, contributing to existing inequities in California’s post-secondary systems.

**Stanislaus State**, on the other hand, takes a personalized approach to supporting students, recognizing that each student’s story and situation are unique. To identify how best to assist students, financial aid and basic needs work together frequently, including through both the director and interim assistant director of financial aid who liaise with basic needs daily on everything from cost of attendance appeals (see promising practice #7, *Maximize Access to Financial Aid*) to identifying, reaching out to, and supporting eligible students in applying for CalFresh.

Similarly, at **Long Beach City College (LBCC)** campus administrators have actively promoted an attitude of doing everything possible to assist students by being flexible and encouraging creativity in identifying resources to support them. This was inspired in part by the forced adjustment during the COVID-19 pandemic that required ‘out-of-the-box’ thinking to identify different methods to deliver services to students effectively. This approach has been maintained and supported by leadership during the transition back to campus, and a campus-wide recognition of and allowance for the stressors that students face—as well as an understanding that no two situations are the same—has helped identify and connect students with the supports they need to succeed.

Basic needs and financial aid at LBCC collaborate in multiple ways including through frequent direct communication between their two directors who work together to process and quickly disburse basic needs direct aid, such as housing assistance and emergency aid. This includes automatically providing students who identify themselves as housing insecure or homeless on the LBCC Emergency Aid Application with the Request for Change in Dependency Status to increase their financial aid, which they can submit online directly to the financial aid office.<sup>13</sup> The financial aid front desk staff are connected with the basic needs office and provide students they identify as basic needs insecure or with high financial need with information about basic needs resources and contact information—sometimes walking students over to the Basic Needs Center—steps that are critical since financial aid is often the first stop for their students facing financial crises.

At **Mt. San Antonio College (Mt. SAC)**, in eastern Los Angeles County, financial aid and basic needs work together to create a seamless process for students who seek emergency financial assistance; basic needs staff fill out a financial aid form on behalf of the student and financial aid staff process it without requiring any additional confirmation or documentation. With the two departments collaborating to remove student burden and roadblocks, students can more easily access the resources that support their success.

And at **Glendale Community College (GCC)**, the financial aid director consistently examines its long-standing policies and reviews them for any type of bias, making changes where data analysis and other investigation reveal inequities and unfair impacts on students and specific student populations (for more on how GCC uses data analysis to inform verification policy, see promising practice #7d, *Minimize the Verification Burden on Students*).

At the system level, the **UCOP** has taken steps to help all of its institutions align with the philosophy that financial aid and basic needs are two sides of the same coin and key parts of the student support ecosystem. Leadership has encouraged financial aid offices to work together with basic needs centers and supports meetings between the two locally on each campus so that they can discuss issues and identify areas for collaboration. Partially as a result of this local ideation, all campus financial aid offices have designated someone within them to liaise with the basic needs centers on an ongoing basis. Systemwide meetings have also been jointly organized by leadership to include basic needs coordinators, financial aid directors, and staff in both areas. Meetings such as these have helped to foster intra-campus communication and resulted in more consistency in the interface between basic needs support and financial aid policies.

To support its staff in providing students with the financial resources they need to be successful, UCOP issued guidance in 2019 and again in 2022 to its campuses on direct support to students that defined which types of resources need to be coordinated with financial aid.<sup>14</sup> The most recent guidance was informed by research into Title IV regulations conducted by the University of California, Merced’s Director of Financial Aid and Scholarships in anticipation of questions about the impact and coordination of basic needs resources on students’ financial aid. UCOP notes in this guidance that “these guidelines form the framework for funding sources to work in tandem to support UC students, informed by federal and state student aid regulations and campus practices, while keeping students’ best interest at the forefront.”



In particular, the guidelines specify that both in-kind and short-term support, including CalFresh benefits, meal swipe cards and emergency grocery cards that are not exchangeable for cash, and other nominal emergency support valued less than \$100 per year, should *not* negatively impact a student’s financial aid package. For other types of support that do get counted towards a student’s maximum financial aid, UCOP outlines strategies that financial aid offices can employ to make space for additional funding by offsetting student self-help or work and loan expectations, and adjusting the student’s cost of attendance, where appropriate. This allows UC campuses, with the support of their system office, to exercise due diligence with respect to financial aid regulations while also using flexibility to support high-need students.

As noted previously, the **CCC Chancellor’s Office** is also being proactive in an effort to identify strategies for improved coordination between basic needs and financial aid offices through the creation of a Community of Practice that launched in early 2023. During systemwide meetings at the **CSU Chancellor’s Office**, financial aid and basic needs leadership discuss the importance of working together to assist students, such as by identifying which resources can support those who need additional, emergency funding to get them through the next month.



At UC Santa Barbara, the Financial Crisis Response Team conducts reviews of emergency student needs efficiently over email and responds to students within 24 to 48 hours.

## 2 Convene a Joint Committee Across the College That Meets Regularly to Identify Solutions and Maximize Resources

United support for a student-centered mission can also help facilitate the flow and effectiveness of time-sensitive funding. Regularly convening joint committees with participation across the campus—including financial aid, basic needs, academic counseling, and mental health—to discuss how best to serve high-need students can go far in maximizing available resources and keeping students on the path to a college degree.

At **Pierce College**, a taskforce composed of representatives from across the campus determined how best to allocate federal Higher Education Emergency Relief Fund (HEERF) emergency aid dollars at the height of the COVID-19 pandemic.<sup>15</sup> This collaboration emerged from a campus culture that is committed to ensuring students don't have to jump through hoops to get what they need, along with a "how we can help each other" and "everybody wins" mentality. The taskforce allowed for a range of perspectives on how best to allocate emergency funding and facilitated warm handoffs among student support staff to ensure that students received all the services they needed to remain successful.

Another example of cross-campus collaboration driven by a shared student-centered mission is the Financial Crisis Response Team (FCRT) at **University of California, Santa Barbara (UCSB)**, composed of about a dozen committee members including staff from academic advising, housing, and counseling, who come together to review more complex student financial emergencies. When this partnership began, the committee met a couple of times each week to review cases. Now that committee members from

across campus have an in-depth understanding of the range of resources available and are trained on complicated financial aid issues, they can conduct these reviews efficiently over email and respond to students within 24 to 48 hours. The FCRT now meets quarterly for updates, resource discussions, and to follow-up on specific student cases.

At **UCB**, financial aid and basic needs staff meet weekly to collaboratively evaluate students' needs, including emergency funding requests as well as other basic needs concerns. Students may be awarded additional funding through state and donor funds, which are made accessible through the Basic Needs Assistance Form. This form, which serves as an entry point to multiple programs including the Basic Needs Emergency Fund, is a single streamlined process that, importantly, doesn't require students to figure out on the front end the resources for which they may be eligible. Both undergraduate and graduate students, including those who are undocumented or international, can receive support for housing, food, and other emergency and safety needs.<sup>16</sup> The culture created through this partnership is one in which the needs of the students are the driving force behind funding decisions.





A formalized structure across a college—that includes the departments that directly impact student success and whose staff meets consistently—is key to facilitating college affordability and basic needs security, and ensuring a smooth academic path forward. This includes student services, whose staff may be more aware of the hurdles students are facing; academic advisors, who are familiar with students’ academic goals and any challenges they may be encountering; and the business office, which manages student accounts and is a necessary partner in resolving issues such as outstanding balances that may be holding up financial aid. At **Mt. SAC**, representatives from across the college including financial aid sit on the Basic Needs Committee, an advisory council that meets monthly to review programming updates, new legislation, and any issues that have arisen and need support. At **Pierce College**, the director of financial aid

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co-chairs the Student Support Committee, which includes basic needs and is currently examining housing at the district level.

When convening these committees, it is important to include students to ensure those with first-hand experience can directly provide input and feedback. Moreover, inviting all campus offices that administer any funding or resources to students to conversations to craft an institutional college affordability and basic needs strategy can help move colleges towards a more comprehensive student-centered approach to student success; this includes categorical programs such as CalWORKs, CARE, EOP, EOPS, NextUP, and others that connect students with a wide range of support. And on a regular—at least annual—basis, these committees should reevaluate their mission, policies, and procedures to ensure they continue to be responsive to the issues students are currently facing.

When convening joint committees, it is important to include students to ensure those with first-hand experience can directly provide input and feedback.

### 3 Identify a Designated Liaison to Work Collaboratively with Basic Needs and Financial Aid Offices

Designated liaisons who work collaboratively across basic needs and financial aid can facilitate sharing key information with and about students, and address privacy concerns because they are trained in both offices' practices. A liaison can help identify students who have applied for financial aid who may be eligible for additional resources, such as those who are eligible for CalFresh or experiencing housing insecurity, and linking these students to the basic needs center.

The liaison can also support cross-promotion of financial aid and basic needs programs and ensure that student-facing forms used to access basic needs services include information about financial aid. At **Pierce College**, for example, the liaison helped to inform the college's welcome (i.e., intake) form, which includes a comprehensive overview of both financial aid and basic needs services along with a "wish list" of available support services that students can select to receive more information. These include housing support, food support such as CalFresh application assistance, financial aid, veterans' services, child care, and undocumented student support.

The liaison role serves the dual purpose of proactively identifying students who could benefit from available support and promoting enhanced information sharing so students who may not be taking advantage of all the resources available to them are made aware of their options. By acting as an intermediary across college departments and community agencies, liaisons help ensure that students are maximizing the benefits available to them. Liaisons can also function as a "help desk" for student services staff who are assisting students with financial aid.

At Pierce College, the liaison has access to an appointment system to make student referrals, and helps students navigate the steps to access

By acting as an intermediary across college departments and community agencies, liaisons help ensure that students are maximizing the benefits available to them.

resources. Liaisons help ensure students receive a warm handoff from one office to another, and can share with other staff information students have already disclosed so students don't have to waste valuable time—or be retraumatized—by sharing their story multiple times and continuing to "prove" that they are under-resourced.

To maximize the impact they have in their role, it is important that liaisons feel welcomed by and integrated into both basic needs and financial aid. Moreover, giving the liaison the authority to develop and advance policies and practices that streamline service access is key to ensuring they are best equipped to support students.

### 4 Leverage Data Systems to Maximize Resource Access

Student information systems can be an important tool in both identifying students most in need of support and developing data-informed strategies to decide how resources can be most equitably allocated. To identify students who may be eligible for additional funding, the financial aid director at **Pierce College** gives certain staff, including liaisons, viewing access to permissible financial aid information, such as whether a student has filed a Free Application for Federal Student Aid (FAFSA) or California Dream Act Application (CADAA). This helps ensure students have applied for all forms of financial aid for which they are eligible before turning to emergency funding.

The Pierce College financial aid office also shares lists of students experiencing homelessness with the basic needs center to facilitate outreach for housing support, and the basic needs intake form



By sharing data about who seeks and receives specific services and supports, such as CalFresh or emergency funding to remain housed, colleges can have a more complete sense of where students are struggling and whether there may be a systemic problem for a subset of students that the campus should address.

includes questions that identify students who should connect with financial aid. This continuous communication, along with a culture of trust across the departments, is key to information sharing that supports students' awareness of and access to resources. It also illustrates that data sharing can be done in ways that protect students' privacy and sensitive financial information while ensuring staff who have an intimate understanding of students' struggles are able to connect them with the resources they need.

At **UCSB**, data is used to proactively award students before they show up in a crisis. For example, in the midst of the pandemic the financial aid office identified students residing in family housing who were behind on rent and reached out to offer HEERF funds and connect them with other resources they might need. Currently, when the university is aware via its billing system that students are behind on rent for family student housing, staff reach out to help students get back on track. UCSB also proactively looks at certain more vulnerable student populations, like those who are undocumented or veterans, to support them if they have fallen behind financially—an indicator to the university that they need additional support.

At **LBCC**, basic needs staff are provided access to the BankMobile system that financial aid utilizes, so they can communicate directly with students regarding the status of their direct aid and when they can expect emergency funding. This is especially critical for students in grave situations, such as those facing eviction, for whom every day until they receive their funding is increasingly stressful.

Data collected by student services can also help inform the college about who is accessing which programs and at what frequency. By sharing who seeks and receives specific services and supports, such as CalFresh or emergency funding to remain housed, colleges can have a more complete sense of where students are struggling and whether there may be a systemic problem for a subset of students that the campus should address. Colleges can also use this data to help inform the development of accurate cost of attendance budgets. Moreover, ensuring that other areas throughout the college collect pertinent data to share with student services, such as including questions about basic needs on college application forms, can help staff proactively identify students with specific needs.

Benefits Data Trust, an organization that helps link people to essential benefits and services, recently released a toolkit intended to help colleges and universities leverage available data to identify students who are likely eligible for programs such as the federal Affordable Connectivity Program, Child Tax Credit, Medicaid, Supplemental Nutrition Assistance Program (SNAP, which is called CalFresh in California), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). This [toolkit](#), which was guided by the feedback of a volunteer advisory council of national and institutional leaders in student benefits access, builds institutional capacity for connecting potentially eligible undergraduates with benefits that support food security, improve health outcomes, and support persistence and graduation.<sup>17</sup>

## 5 Provide Regular Opportunities for Cross-Training and Communication

Cross-training between the basic needs and financial aid offices can support collaboration by providing opportunities to communicate about respective roles and programs, available tools, and challenges. It also provides the space to jointly problem solve and identify solutions that best support students. Each office has key expertise and experience that combined can help students access the range of resources they need to be successful.

For example, basic needs staff may have a more intimate understanding of students' circumstances and identify ways that policies and procedures—such as requiring parental information from a student who is estranged from an abusive family—prevent them from getting financial aid. In turn, financial aid can help basic needs staff understand the eligibility criteria for financial aid as well as how best to navigate the financial aid processes to maximize aid.

Each office has key expertise and experience that combined can help students access the range of resources they need to be successful.

To facilitate information sharing and support cross-office education, the **CSUSM** Cougar Care Network (basic needs) has regularly invited specialized programs including financial aid to give staff updates and answer their questions about programs and operations. This has helped foster a community of trust and collaboration; the financial aid office refers students to the Cougar Care Network frequently, and when basic needs staff work with a student in a critical situation the financial aid office has been a partner in identifying resources that can support them.



At **Stanislaus State**, cross-training between basic needs and financial aid, along with basic needs ally training across campus, is vital to ensuring staff have a comprehensive understanding of available support services and are empowered to make appropriate student referrals. One example of this is the cost of attendance appeals process in which basic needs staff are trained to support students in filing an appeal to increase their student budget and the amount of financial aid for which they are eligible (for more on financial aid administrators' ability to exercise Professional Judgment including cost of attendance adjustments, see promising practice #7, *Maximize Access to Financial Aid*). Similarly, at **Mt. SAC**, the financial aid office provides trainings on various processes and procedures so when students need, for example, a dependency override or an adjustment to their Expected Family Contribution (EFC),<sup>18</sup> basic needs staff can help guide them through it.

Sustained communication and collaboration also facilitate identifying and utilizing multiple "touch points" to reach students, such as student orientation and course enrollment, as well as partnering with faculty and academic and mental health counselors. At **UCSB**, faculty, who are on the front lines and to whom students may confide, have been key in connecting students to resources like warm meals on campus. To facilitate this partnership, student services staff have attended department and faculty committee meetings to give presentations on basic needs. Faculty were also provided wording about available support to include in their course syllabi and meal vouchers that they could give out if they encountered students who needed a meal. At the peak of UCSB's food voucher program, there were 50 distribution points for vouchers, including faculty. By educating faculty about basic needs insecurity and the impact it has on students and their ability to succeed in the classroom, UCSB has cultivated many new advocates across campus who are empowered to help students.

At Stanislaus State, basic needs staff are trained by financial aid staff to support students in filing an appeal to increase their student budget and the amount of financial aid for which they are eligible.





## 6

### Strengthen Coordination Between Basic Needs and Financial Aid Offices to Ensure Students Receive All Benefits for Which They Are Eligible

Consistent communication between basic needs and financial aid offices can help ensure students are applying for and receiving all types of financial assistance for which they are eligible, including sources beyond traditional financial aid such as social service public benefits, emergency aid, and in-kind resources like grocery cards or transportation vouchers. When staff are informed about all available resources and how they may intersect, such as a pandemic-related temporary change that allowed students to qualify for CalFresh by being eligible for Federal Work Study—even if they are not placed in a Work Study job—students benefit.<sup>19</sup> Additionally, students who are not eligible for certain types of assistance, such as undocumented students who cannot access federal SNAP (CalFresh in California) benefits, can be directed to resources like institutional funding to support food-insecure students.

In recent years, the California Legislature has taken steps to address student hunger by strengthening student access to CalFresh. This includes AB 396 in 2021,<sup>20</sup> which increases the number of postsecondary programs that confer eligibility for CalFresh, and SB 641 in 2022,<sup>21</sup> which requires the California Department of Social Services to maintain an updated list of these programs and to convene a workgroup to identify the steps needed to accommodate a substantial increase in student applications. Also in 2022, the federal government explicitly authorized the use of FAFSA information to conduct outreach for students who are potentially eligible for SNAP and various other benefits.<sup>22</sup> California has taken further steps towards universal adoption of policies that take advantage of this authorization by enacting AB 2810, which requires each CSU and community college to use FAFSA data to identify students who are likely to meet the income qualifications for the CalFresh program and outreach to these students via email.<sup>23</sup>

Prior to the adoption of AB 2810, some colleges had already developed systems to implement this type of outreach. For example, at **UC Irvine (UCI)**, every October the Financial Aid Basic Needs Counselor, the liaison housed in the financial aid office who works closely with basic needs, runs rosters of students who are likely eligible for CalFresh, such as those with Cal Grants or Work Study eligibility, to reach out to them and share information. For undocumented students who are ineligible for federal funding like SNAP, the UCI Basic Needs Center has its own fund that prioritizes dollars to students with the highest unmet need. This proactive identification and invitation of undocumented students to participate leads to about 100–200 additional students receiving food support annually.

Similarly, at **UCB** the financial aid office runs a roster of students who meet CalFresh eligibility exemptions at the beginning of the fall and spring terms. All potentially eligible students receive an email with information on how to apply for CalFresh benefits, as well as information on other UCB Basic Needs Center services. For undocumented students who are not able to access CalFresh benefits, UCB has a basic needs food award of \$200 per month for 10 months.

At **Mt. SAC**, collaboration between financial aid and basic needs is multifaceted, including partnering on CalFresh outreach efforts. At the beginning of every semester, financial aid runs a report of all students who appear to meet CalFresh student eligibility criteria and emails them a letter, created by basic needs staff, with information about the program and how to apply. The email also includes a notice to county officials that serves as evidence that the student qualifies for an exemption to the 20-hour per week CalFresh work requirement. Prior to implementing this process, approximately 20 to 30 students per term were applying for CalFresh; now as many as 350 have applied during a single semester with staff estimating that approximately half of applicants received benefits.

## GETTING DOWN TO BUSINESS

While fostering a culture of collaboration is essential to shifting towards a student-centered narrative to address basic needs insecurity, concrete policy change is where the rubber meets the road. Below is a sampling of some of the policies implemented by campuses highlighted in this report that your college or university could replicate if not already in place.

### INSTITUTIONS OF HIGHER EDUCATION CAN...

- ✓ **Conduct a review of policies for any unintended bias** and adjust policies when inequities are identified. For example, colleges can use data to evaluate if any student groups are disproportionately impacted by financial aid verification or SAP policies.
- ✓ **Repeal any unnecessarily punitive administrative policies**, such as putting holds on financial aid if a student has an unpaid balance from an overdue library book and other policies created in the name of holding students accountable.
- ✓ **Eliminate “drop for non-payment” policies**, which automatically drop students from enrolled courses if they have a balance due on their student account.
- ✓ Create a policy to automatically provide students who identify themselves as housing insecure or experiencing homelessness on emergency aid applications with a request for **change in dependency status** to increase their financial aid.
- ✓ Create a basic needs assistance form to serve as a **single-entry point** to multiple programs including a basic needs emergency fund so that students do not need to figure out on the front end which resources they may be eligible for or submit multiple duplicative applications.
- ✓ **Develop automated systems** that alert staff via the billing system when students are behind on rent in student housing so that staff can offer support to help students get back on track.
- ✓ **Run rosters of students who are likely eligible for CalFresh**, such as those with Cal Grants or Work Study eligibility, and then proactively reach out and share information.
- ✓ **Allow Basic Needs Directors to authenticate a student’s circumstances** when a student is seeking the use of Professional Judgment (PJ) to modify financial aid eligibility.
- ✓ When requests for emergency aid are made to basic needs centers, **institute a policy that allows the financial aid office to rely on the information provided by the basic needs staff** to process the request without requiring any additional confirmation or documentation.
- ✓ **Streamline the Cost of Attendance (COA) appeals process**, moving it to an accessible online form to decrease administrative barriers that students encounter when seeking adjustments.
- ✓ **Institute flexibility** in how remedial and repeated courses, transfer credits, and courses not counting towards a new major are treated to maximize access to financial aid.
- ✓ Create instructions for submitting a Satisfactory Academic Progress (SAP) appeal in **student-friendly language** that encourages the use of the process. Allow for a broad range of extenuating circumstances in SAP appeals policies.
- ✓ **Dedicate financial aid office hours** specifically for students utilizing basic needs services.

The best strategy for addressing college student basic needs insecurity is preventing it from occurring in the first place, and maximizing access to financial aid is the most important tool in this endeavor.

### 7 Maximize Access to Financial Aid

The best strategy for addressing college student basic needs insecurity is preventing it from occurring in the first place, and maximizing access to financial aid is the most important tool in this endeavor. While there are many internal policies over which financial aid offices have discretion, four are particularly important to maximize financial aid receipt for students most at risk of facing basic needs insecurity, for whom early intervention is critical.

### a Ensure Students Receive All Financial Aid for Which They Are Eligible

Ensuring students receive all the financial aid for which they are eligible is foundational to supporting college affordability and promoting student success. To that end it is critical that students are guided not only in filing the FAFSA and CADAA but throughout the entire application process, which may include verification and requests for additional supporting information,<sup>24</sup> so that they take advantage of available financial aid options before turning to other forms of more limited assistance like emergency aid.

Regularly combing through financial aid files helps ensure students are receiving all the financial aid for which they are eligible and is a role well suited for a liaison who has knowledge of the resources available across the campus. At **UCI**, the Financial Aid Basic Needs Counselor reviews financial aid files for students who submit an inquiry for the Economic Crisis Response Grant to determine what options may be available before using emergency funds. In some cases, the counselor may adjust students' aid to the appropriate cost of attendance budget (at home, off/on campus), direct and support students with appeals that may result in additional funding, and assist with completing pending items that could be holding up aid disbursement. The UCI Economic Crisis Response Team, which includes the Financial Aid Basic Needs Counselor, meets weekly to discuss how best to support students' financial crisis situations using the financial aid information collected as well as any available campus and community resources.

The **CSU Chancellor's Office** shared that they have provided guidance to campus administrators to proactively repackage students' financial aid throughout the year when additional State University Grant (SUG) dollars become available (e.g., because previously awarded students haven't enrolled). And at **Mt. SAC**, the Basic Needs Director shared that financial aid operates under a model of "compliance with compassion," identifying where there is flexibility in policies to make sure students are fully benefitting from the financial support available.

Regularly combing through financial aid files helps ensure students are receiving all the financial aid for which they are eligible and is a role well suited for a liaison who has knowledge of the resources available across the campus.



Moreover, maintaining systems to share student-level information that allow staff to proactively reach out to students helps ensure they are accessing all available resources (for more, see promising practice #4,

*Leverage Data Systems to*

*Maximize Resource Access*). For example, identifying community college students who received a fee waiver (California College Promise Grant) because they access public benefits or have an income below a certain threshold, but who are not receiving other financial aid, can be used as a flag to determine if these students may be eligible for additional federal and state financial aid.

Additionally, identifying and proactively assisting students who aren't receiving more traditional forms of financial assistance can help these students avoid needing to utilize more limited basic needs resources. For example, undocumented students who cannot receive federal aid can be assisted in accessing available state aid, those who have lost financial aid due to not meeting Satisfactory Academic Progress (SAP) requirements can be guided through the appeals process to regain aid, and those with past due balances can be assisted in creating reasonable payment plans that allow them to maintain access to financial aid.

It is also important that colleges review their own policies and practices from a student-centered perspective and examine whether potential barriers are statutorily required or institutional choices. For example, does the college require students to provide additional documentation beyond the federal minimum, which may hold up aid for students who are unable or unsure how to access the information? Or does the college have a policy where students cannot receive financial aid until all past due balances, even for something as small as an overdue library book, are paid? **LBCC**, for example, has eliminated its "drop for non-payment"

**It is important that colleges review their own policies and practices from a student-centered perspective and examine whether potential barriers are statutorily required or institutional choices.**

policy, which previously automatically dropped students from enrolled courses if they had a balance on their student accounts.

Even if a school does not have punitive policies, it is important to examine how information about financial aid is made available to students. For example, are materials printed in the languages most commonly spoken by students and their families and is the financial aid office open on weekends or evenings to ensure that working and parenting students can stop in for support?<sup>25</sup> At a minimum, it is important that college websites are up to date with information about available services so students with significant responsibilities outside of school, such as work and childcare obligations, that limit their ability to access information during regular business hours can find answers to their questions easily and connect to resources.

### **b** **Make Use of Options to Exercise Professional Judgment and Grant Satisfactory Academic Progress Appeals**

#### **PROFESSIONAL JUDGMENT**

Financial aid administrators have an important tool at their disposal called Professional Judgment (PJ), which allows them to adjust, on a documented case-by-case basis, components of a student's financial aid application that can impact the types and amounts of financial aid they receive.<sup>26</sup> This includes granting a dependency override for a student who is unable to provide parental information; updating information collected on financial aid applications that is no longer accurate,

such as family income when a parent has recently lost their job, which in turn adjusts how much the student and their family are expected to contribute; and increasing, for example, a single parent’s cost of attendance budget to include childcare costs during class and study time.

Colleges must document any adjustments in a student’s file and follow the procedures they themselves have put in place, and they have discretion in determining what those procedures are. Federal statute does not prescribe what type of documentation a college must collect so long as it is reasonable. For example, a college’s policy can specify that an interview with or written statement from the impacted student is sufficient documentation when third-party documentation is not available. Colleges and their students can benefit by not overly defining which special circumstances count as grounds for the use of PJ; if they are too restrictive this will prevent them from exercising PJ for a student who otherwise reasonably could have been aided by it.

By properly utilizing and documenting Professional Judgment, colleges can remove unnecessary barriers for students while also remaining compliant.

Under the FAFSA Simplification Act, starting with the 2023–24 award year, institutions may not maintain a policy of denying all PJ requests but must consider all such requests and develop policies and processes for reviewing them. This includes the evaluation of financial situations that justify adjusting the Cost of Attendance or Expected Family Contribution and conditions that justify adjustments to a student’s dependency status (i.e., dependency override). The Act also contains new requirements for processing and communicating with students who request adjustments, including

that schools must notify students of the school’s process, requirements, and reasonable timeline to review adjustment requests after their FAFSA is submitted.<sup>27</sup>

As long as the given circumstances can be sufficiently defended, **Pierce College** is flexible in their use of exercising PJ. For example, if a student has lost their job but that is not reflected on their FAFSA or CADAA, the financial aid office can adjust their EFC which, in turn, may make them eligible for increased financial aid. And the **CSU Chancellor’s Office** reports that they provide guidance to campuses to put information about PJ and how to reach out about it in students’ award letters, so

students are aware they can request an adjustment if there is a change in their income or they need additional financial aid. Information about Professional Judgment and Satisfactory Academic Progress is also on campus websites.

A liaison between financial aid and basic needs is the ideal staff member to be tasked with making PJ determinations, given their intimate knowledge of both the student’s financial

aid status and other extenuating circumstances such as caring for a sick family member or not speaking with parents because of an unsafe home environment. Even when liaisons do not make the actual PJ determination themselves, their knowledge of students’ circumstances should be considered as adequate verification of a student’s situation rather than requiring additional third-party verification. At **CSUSM**, the director of the Cougar Care Network (basic needs), who works closely with financial aid, can authenticate a student’s circumstances when seeking PJ.

**By properly utilizing and documenting Professional Judgment, colleges can remove unnecessary barriers for students while also remaining compliant.**

**A liaison between financial aid and basic needs is the ideal staff member to be tasked with making PJ determinations, given their intimate knowledge of both the student's financial aid status and other extenuating circumstances.**

At colleges where PJ is rarely used, it may be because staff lack the capacity to do the adjustments, which are often manual, or due to an unnecessarily conservative interpretation of the rules. Given the workload required to review and grant PJs, it is important to examine how much administrative funding financial aid offices receive and whether additional resources would support these efforts. In acknowledgment of California community college financial aid office overall workload, the 2022–23 California state budget included a \$10 million augmentation to student financial aid administration funding across its 116 community college campuses;<sup>28</sup> however, additional funding is still needed to ensure that students have access to the support needed to navigate complex financial aid processes.

Some financial aid administrators may be concerned about the use of PJ triggering an audit; while not unfounded, this concern should not be the basis for denying justifiable PJ requests. In fact, the U.S. Department of Education has issued guidance throughout the COVID–19 pandemic reminding financial aid administrators of their ability to exercise PJ to ensure students are receiving all financial aid to which they are entitled.<sup>29</sup>

**While SAP standards are set by the federal government, institutions have considerable flexibility in how these standards are applied.**

## SATISFACTORY ACADEMIC PROGRESS

Students may also find themselves looking to basic needs for support because their financial aid was cut off due to no longer making Satisfactory Academic Progress (SAP), a measurement used to determine if a student is on track to earning their credential.

While SAP standards are set by the federal government, institutions have considerable flexibility in how these standards are applied. For example, some colleges have stricter standards than the minimum required by the federal government. Colleges also vary in the extent to which they identify, reach out to, and support students in danger of not meeting SAP; and whether there is a process to appeal or remedy SAP decisions that is easy to understand and navigate. John Burton Advocates for Youth has issued two reports, *The Overlooked Obstacle, Part 1 and Part 2*, to help institutions better understand how their internal policies may be creating unnecessary barriers.<sup>30</sup>

The financial aid office at **LBCC** strives to maintain open avenues of communication with other student services, including academic counseling, to identify and support students *before* they hit SAP barriers, such as by creating an education plan and helping students stay on track with it. And when reviewing SAP, LBCC tries to be as flexible as possible, including maximizing the number of classes that are not included in the SAP calculation, and connecting students with the supports they need to be successful. The financial aid director shares that after many years of working with students he has realized that too stringent SAP policies do students a disservice and set them back, and that by being a little more understanding it may take a student, such as one who changed majors because they realized they were better suited for a different field, just one or two more terms to reach their educational goal.



Too stringent SAP policies do students a disservice and set them back; by being a little more understanding it may take a student, such as one who changed majors because they realized they were better suited for a different field, just one or two more terms to reach their educational goal.

At **CSUSM**, basic needs and financial aid work together to help students facing SAP challenges. In special circumstances, like family members who are sick with Covid, basic needs staff can attest to the impact it has had on a student's ability to succeed academically; other times, they can work together to connect students to appropriate support services like tutoring or counseling. At **UCSB**, staff intervene to support students before they lose financial aid due to SAP; in cases where they do lose aid, there is an appeals process to try to get them back on track as quickly as possible and often institutional resources are used to backfill financial aid in the interim. And **GCC** has found that its students who complete the SAP appeals process are more likely to remain enrolled and has responded by instituting drop-in workshops to support students throughout the process.

By exercising PJ where appropriate and creating a SAP appeals process that is easy to navigate, financial aid staff can help ensure students access available financial aid to meet their basic needs and support their success before turning to emergency aid and other more limited forms of funding. It is also critical in addressing racial and ethnic equity gaps in college affordability and attainment. JBAY's *The Overlooked Obstacle: How Satisfactory Academic Progress Policies Impede Student Success and Equity* found that while nearly one-quarter of California community college Pell Grant recipients are losing financial aid due to SAP after their first year of college, Black recipients are losing it at an even more alarming rate of 34 percent—more than double that of their white peers (15 percent).<sup>31</sup>



### Actively Utilize Cost of Attendance Budget Adjustments to Accurately Reflect Students' Expenses

Cost of Attendance (COA) budgets lay the foundation for how much financial support students can receive; generally, need-based aid cannot exceed a student's financial need (COA less Expected Family Contribution) and total financial assistance cannot exceed their total COA.<sup>32</sup> The federal Higher Education Act spells out which expenses can be included in a student's COA,<sup>33</sup> but has historically only expected that they be appropriate and reasonable amounts, giving colleges latitude in setting budgets for students.<sup>34</sup> Allowable expenses are tuition and fees, books and supplies, transportation, room and board, and miscellaneous personal expenses. Additional costs such as child care for students with dependents, and some other defined costs—like lab fees or some fees associated with student loans—can also be included in a student's COA; however, if a college has established standard cost categories then they must apply them uniformly to all students in those categories.<sup>35</sup>

The FAFSA Simplification Act made changes such that beginning with the 2023–24 award year, in recognition of costs some students face such as paying rent to live at home, institutions must include a reasonable standard allowance that is not zero for living expenses for dependent students living at home with parents. Institutions must also include a food allowance equivalent to the cost of at least three meals per day. On-campus housing allowances must also be determined separately for students with and without dependents, with each allowance required to be determined using the greater of the average or median amount assessed for housing charges for each respective group.<sup>36</sup>

Most colleges opt to use average rather than actual costs for different categories of students, such as those living on campus, off campus with relatives, and off campus independently. As long as a college is consistent in how it awards all students with the same academic workload (e.g., full-time, half-time enrollment), they can base average costs on a variety of sources, such as student surveys or public data like HUD Fair Market Rents.

Because COA budgets dictate how much aid a student can receive, it is crucial that they are as accurate as possible and reflect students' circumstances. For example, if a college uses a statewide average for housing that does not reflect real housing costs in its region, students will not be able to receive sufficient funding even when it is available.

In addition, while many institutions rely on student cost surveys, such as the Student Expenses and Resources Survey administered by the California Student Aid Commission,<sup>37</sup> which can be useful in learning about students' experiences, these surveys may not always reflect true costs. For example, a student who is food insecure may report that they spend \$50 per week on food because that's all they can afford. Supplementing this information with regional data from other reliable sources can help provide a more accurate estimate of the true costs students face in order to fully meet their basic needs.

It is also important that students are informed about all of the costs they are allowed to include in their COA. Students may not be aware, for example, that child care costs may be included if they are a parent, or that if they have disability-related expenses such as costs for personal assistance,

**Because COA budgets dictate how much aid a student can receive, it is crucial that they are as accurate as possible and reflect students' circumstances.**

transportation, equipment, or supplies, their costs may be included in their total COA.<sup>38</sup>

As discussed in greater detail in promising practice #7b on exercising Professional Judgment (PJ), financial aid administrators have the authority to adjust elements of students' financial aid applications, including COA, on a documented, case-by-case basis. At **Pierce College**, for example, if a student's car breaks down and they can't take public transportation because it's not available during the night classes when the student can attend, adjusting a student's budget to pay for car repairs may be appropriate. At **Stanislaus State**, financial aid leadership has streamlined the COA appeals process, moving it to an accessible online form—with accompanying explanatory video—to decrease administrative barriers that students had encountered when seeking emergency grants under a previous, less efficient process.<sup>39</sup>

Exercising PJ by adjusting a student's budget to accurately reflect their expenses helps ensure students have access to the financial resources they need to be successful.

**Exercising PJ by adjusting a student's budget to accurately reflect their expenses helps ensure students have access to the financial resources they need to be successful.**

## **d** Minimize the Verification Burden on Students

For some students, the FAFSA process includes a step called verification, during which students are asked to provide additional proof of the information provided on their FAFSA, including demographic and/or financial information. A report from the National College Attainment Network (NCAN) and National Association of Student Financial Aid Administrators (NASFAA) found that verification imposes significant barriers on students while resulting in little change to award amounts. The report notes that some students selected for verification are unable to provide the necessary documentation. NCAN estimates that as many as 28 percent selected for verification do not complete the process. When this occurs, the student loses access to federal financial aid and may also lose state and institutional aid. Students with low incomes are also disproportionately impacted by verification requirements, with those who qualify for a Pell Grant being significantly more likely to be subject to verification than those who do not. The report also notes that verification imposes a considerable burden on institutions given the manual nature of reviewing documentation.<sup>40</sup>

To reduce the burden of verification and maximize students' access to financial aid, a report by the Community College League of California<sup>41</sup> includes the following recommendations to institutions:

- ➔ **Verify only the applications selected by the office of Federal Student Aid (FSA) of the U.S. Department of Education (ED) or where conflicting information presents itself.** Colleges are only required to verify applications that are flagged for verification by the federal government, but they have the discretion to select additional applications for verification. When institutions choose to impose verification requirements beyond those federally required, it creates burdens on both students and staff with little gain.
- ➔ **Support students to navigate the process.** The process of gathering needed documents to verify FAFSA information can be complex, and students may need assistance. Making support

available to help students navigate the processes for obtaining necessary documentation can pay dividends by helping students stay enrolled who would otherwise drop out due to an inability to obtain financial aid.

At **GCC, LBCC, and Pierce College**, financial aid administrators only verify students selected by FSA or when conflicting information arises. For any student who is selected for verification, these colleges support them in a variety of ways. **LBCC** assists students with document identification, form completion through CampusLogic software, and by supporting students to resolve any other issue or question they may have regarding the process. **Pierce College's** Welcome Center provides assistance to students in navigating the verification process and answers any questions relating to financial aid. And **GCC** ensures there are multiple pathways for students to submit documentation including online and in paper form.

Additionally, **GCC** has used data analyses to assess verification policies and make changes to avoid any disproportionate impacts. For example, the college had a longstanding policy of verifying all students who met the criteria to be independent on the FAFSA for any reason other than age.<sup>42</sup> An investigation found that Latinx and Black students were disproportionately selected, yet verification of students' dependency status contributed to a Pell calculation variation of only .03 percent—meaning almost no students saw a change to their Pell award amounts. This practice has since been repealed. GCC also intends to replicate its model of offering drop-in workshops, which was instituted to help students submit SAP appeals, to support students through verification.



Placing both basic needs and financial aid under Student Services/Affairs can help to connect students more seamlessly with other critical resources, as well as support a broader cultural shift towards placing financial aid in the student services continuum.

**8 House Basic Needs and Financial Aid Offices Within the Same Division**

Depending on the institution of higher education, the placement of basic needs centers and financial aid offices varies within the overall organizational structure. At some colleges, financial aid and basic needs are under the same umbrella department or division and are therefore supervised by the same leader and their guiding vision. This structure was reported to help facilitate collaboration. In contrast, when under separate divisions, differing organizational cultures, philosophical approaches, systems for managing resources, and reporting structures can sometimes present challenges for partnership.

Moreover, placing both basic needs and financial aid under Student Services/Affairs can help to connect students more seamlessly with other critical resources like academic and mental health counseling, as well as support a broader cultural shift towards placing financial aid in the student services continuum.

Situating financial aid and basic needs in the same division can be useful in multiple ways, including enabling the streamlining of resources, more seamless student handoffs to better assist in navigating and maximizing available supports, and easing communication between the offices and their staff, including any who serve both (see promising practice #3, *Identify Designated Liaison Who Works Collaboratively With Basic Needs and Financial Aid*

*Offices*). At **Mt. SAC**, having both basic needs and financial aid housed under the Student Services Division has allowed for more frequent interactions among staff in meetings and shared spaces, and facilitates opportunities to develop positive working relationships and collaborate efficiently and effectively. At Mt. SAC, financial aid and basic needs partner in multiple ways, including on campus outreach events and financial literacy programming, CalFresh outreach and support, and financial aid office hours specifically for students utilizing basic needs services.

**As the examples in this report demonstrate, it is possible to be flexible and student-centered while remaining compliant and adhering to statute and regulations.**

At **The University of California, San Francisco (UCSF)**, both basic needs and financial aid are a part of the Student Academic Affairs department and united under the mission “to provide students with the services and resources they need to be successful at UCSF and enter their desired careers when they leave UCSF.”<sup>43</sup> To facilitate their efforts to best support

students, basic needs and financial aid continually share information and provide professional support for each other when hitting roadblocks. Notably, because UCSF is a smaller institution, limited bandwidth and capacity mean the two offices must work well together to be successful. Through their partnership they collaborate on several programs for students including providing information about, assistance with, and referrals for housing and food support, such as CalFresh.

## 9 Hire Staff With Backgrounds in Student Services/Affairs and Social Work

Hiring financial aid and basic needs staff with backgrounds in student services/affairs and social work can help ensure policies and practices are designed and operationalized with an enhanced understanding of the myriad complex personal, academic, and financial challenges that students face. Staff with a background in social work, for example, may bring with them a comprehensive understanding of housing, food, and other community, state, and federal programs that may be available to support students.

At **UCB**, the Director of Basic Needs is a social worker by training, which informs her holistic approach to meeting students' needs. At **LBCC**, the Financial Aid Director's previous role as Director of EOPS has contributed to his view of financial aid and basic needs as intrinsically related, and has informed his approach never to make assumptions about a student's situation but instead take the time to learn about what they need and how they can best be supported. At **Pierce College**, the Financial Aid Director's work with CalFresh and as the Homeless Student Liaison has helped inform how she supports students and has strengthened collaboration with campus basic needs staff.

Additionally, professional development opportunities, such as training regarding how to provide a trauma-informed approach to care, and understanding the multiple challenges students face and how to support them can help ensure all staff are better positioned to assist students in complex circumstances. Collaboration with mental health support and social services agencies is a way to expand staff knowledge and build skills for practitioners to better assist students.

## CONCLUSION

There will always be choices to be made and balances to be struck on how best to serve students. For example, adhering to set guidelines when administering emergency aid can support expediency and get dollars to students faster—but when individual circumstances are not considered, resources may not reach those who most need them. An ongoing commitment to continuous improvement by consistently reviewing campus policies and procedures—along with championing cultural and institutional change that promotes student services partnerships and adapts to student needs and feedback—is key to creating an environment that supports student access, affordability, and success.

As the examples in this report demonstrate, it is possible to be flexible and student-centered while remaining compliant and adhering to statute and regulations. With collaboration, compassion, and creativity, basic needs and financial aid can partner to best assist students, ensuring they receive all the resources for which they are eligible to support them on their journey to earning a meaningful higher education credential.

# APPENDIX

## CALIFORNIA INSTITUTIONS OF HIGHER EDUCATION FEATURED IN REPORT

Institution	Segment	Location	Share Receiving Pell Grants	Total Undergraduate Enrollment	Undergraduate Enrollment by Race/Ethnicity								
					American Indian or Alaska Native	Asian	Black or African American	Hispanic/Latino	Native Hawaiian or other Pacific Islander	White	Two or more races	Unknown	Non-resident
Glendale Community College	CCC	Glendale	37%	11,398	0%	8%	2%	27%	0%	54%	3%	3%	2%
Long Beach City College	CCC	Long Beach	38%	21,500	0%	9%	11%	58%	1%	15%	5%	0%	0%
Los Angeles Pierce College	CCC	Woodland Hills	28%	15,148	0%	9%	5%	48%	0%	29%	4%	4%	1%
Mt. San Antonio College	CCC	Walnut	35%	25,540	0%	18%	4%	64%	0%	9%	3%	0%	1%
CSU San Marcos	CSU	San Marcos	45%	14,963	0%	10%	3%	49%	0%	26%	5%	3%	3%
Stanislaus State	CSU	Turlock	61%	9,198	0%	9%	2%	59%	1%	19%	3%	4%	4%
UC Berkeley	UC	Berkeley	26%	31,814	0%	35%	2%	20%	0%	21%	6%	3%	13%
UC Irvine	UC	Irvine	39%	29,449	0%	37%	2%	26%	0%	13%	5%	1%	15%
UC San Francisco (graduate students only)	UC	San Francisco	n/a	3,165	0%	33%	7%	17%	0%	31%	6%	3%	3%
UC Santa Barbara	UC	Santa Barbara	32%	23,091	0%	18%	2%	25%	0%	32%	9%	3%	11%

Notes: Most recent publicly available data from U.S. Department of Education, National Center for Education Statistics, College Navigator: <https://nces.ed.gov/collegenavigator/>. Fall 2021 Undergraduate enrollment data and AY 2020–21 Undergraduate Student Financial Aid, All Undergraduate Students, Pell Grant data. Enrollment by race/ethnicity may not total 100% due to rounding. UCSF did not offer programs at or below the baccalaureate level in 2020–21, therefore financial aid information was not reported and enrollment is for graduate students only. These data are meant to provide context about the institutions featured and do not indicate a representative sample of colleges and universities throughout California.

# ENDNOTES

<sup>1</sup> Calculations by authors on 12-month enrollment data for the 2020–21 academic year (AY) from the U.S. Department of Education’s Integrated Postsecondary Education Data System: <https://nces.ed.gov/ipeds/use-the-data>. Pell Grant receipt was used as a proxy for student income.

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<sup>11</sup> University of California Basic Needs Initiative. (n.d.). *Professional Development*. Retrieved February 4, 2023, from <https://basicneeds.ucop.edu/resources/professional-development.html>

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<sup>18</sup> Beginning in AY 2024–25, the EFC will be replaced by the Student Aid Index (SAI). For more, see: U.S. Department of Education, Office of Federal Student Aid. (2022, November 4). (*GEN-22-15*) *FAFSA® Simplification Act Changes for Implementation in 2023–24* [Dear colleague letter]. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-11-03/fafsar-simplification-act-changes-implementation-2023-24>

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<sup>22</sup> U.S. Department of Education, Office of Federal Student Aid. (2022, January 20). (*GEN-22-02*) *Use of FAFSA Data to Administer Federal Programs* [Dear colleague letter]. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-01-20/use-fafsa-data-administer-federal-programs>

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<sup>27</sup> For more, see: U.S. Department of Education, Office of Federal Student Aid. (2022, November 4). (*GEN-22-15*) *FAFSA® Simplification Act Changes for Implementation in 2023–24* [Dear colleague letter]. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-11-03/fafsar-simplification-act-changes-implementation-2023-24>

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<sup>34</sup> For more, see: U.S. Department of Education, Office of Federal Student Aid. (2022, November 4). (*GEN-22-15*) *FAFSA® Simplification Act Changes for Implementation in 2023-24* [Dear colleague letter]. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-11-03/fafsar-simplification-act-changes-implementation-2023-24>

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<sup>42</sup> Typically, students under the age of 24 are considered dependent and must provide parental information on their financial aid applications. However, students who meet certain criteria, such as being married or providing the majority of support for children or other dependents - as well as those who receive a dependency override through PJ due to special circumstances like being estranged from an abusive family - may be classified as independent. For more, see U.S. Department of Education, Office of Federal Student Aid. (n.d.). *Dependency Status*. Retrieved February 26, 2023, from <https://studentaid.gov/apply-for-aid/fafsa/filling-out/dependency#dependent-or-independent>

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