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# Transparency of Cost of Attendance Adjustment Processes Across California Public Colleges and Universities



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# Executive Summary

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This review examined the transparency of Cost of Attendance (COA) adjustment processes on the publicly available websites of California’s public colleges and universities. Federal financial aid rules allow institutions to adjust a student’s COA when documented educational expenses exceed standard budget estimates. These adjustments can enable students to access financial aid sufficient to meet their expenses. The review found the following:

**Limited Visibility of COA Adjustment Information:**

Information about COA adjustments is often difficult to locate or not publicly available, particularly on community college websites. Across the three systems of public higher education in California, nearly half of campuses (43%) did not post information about the COA appeal process somewhere on their website.

**Lack of Transparency in COA Data Sources:** Data sources are rarely included on campus websites. Across the three systems, just 18% published data sources used to calculate COA.

**Inconsistent Guidance on Eligible COA Expenses:** Websites with COA adjustment information varied considerably in the expense categories that would be considered for a COA appeal, with 70% failing to state a broad range would be considered.

**Minimal Information on Documentation**

**Requirements:** Campus websites with COA adjustment information did not commonly include information about the form of documentation required, with just 14% of campuses stating that electronic or paper documentation are permissible.

**Absence of Clear Processing Timelines for Appeals:**

Timeframes to process appeals were equally absent on websites with COA adjustment information, with just 7% of campuses across the three systems stating that a student’s request would be processed within 30 days.

# Background & Purpose of Analysis

A college or university’s “Cost of Attendance” (COA) represents the total estimated cost of attending school, and is a central factor in determining a student’s financial aid eligibility and the maximum amount of aid they can receive. Federal and state policies allow institutions to adjust a student’s COA to reflect special circumstances, such as unexpected or higher than average expenses.

This process is especially critical for students facing the greatest financial instability, including those with experience in foster care or homelessness, who may qualify for additional forms of aid. However, many of these students are unable to accept urgently needed assistance because they have reached their COA cap and are not informed about, or do not receive available adjustments. The purpose of the current analysis is to review the extent to which California’s public higher education institutions provide accessible, transparent, and actionable information about the COA adjustment process on their websites. [Federal law](#) requires institutions to make information publicly available about students’ ability to pursue COA adjustments. Institutions may satisfy this requirement in various ways, including posting information on a website, though neither federal nor state law requires website publication. However, website availability is an important indicator of how effectively campuses communicate critical financial aid options to students.



# Analysis Findings

Analysis of All Campus Websites	Community Colleges (N=116)	CSUs (N=23)	UCs (N=9)	Three Sectors Combined (N=148)
Posts information about the COA appeal process somewhere on their website.	54%	61%	100%	57%
Publishes the data sources and assumptions used to calculate the institution's COA budget on the website.	17%	26%	22%	18%

Analysis of Subset of Campus Websites with COA Appeal Information	Community Colleges (N=62)	CSUs (N=14)	UCs (N=9)	Three Sectors Combined (N=85)
The website states that a broad range of expense categories would be considered when reviewing COA appeals.	50%	36%	100%	30%
The website states that students may submit appeal documentation either electronically or in paper form.	26%	7%	11%	14%
The website states a decision on a COA appeal will be made within a 30-day timeframe.	6%	29%	11%	7%

## Nearly Half of Campuses Fail to Inform Students About COA Adjustments

Across all three public higher education systems, 57% of campus websites included a reference to the ability for students to request a Cost of Attendance (COA) adjustment, while 43% did not. UC campuses included this information at the highest rate (100%), followed by CSU campuses (61%) and community colleges (54%). The absence of this information on nearly half of campus websites raises concerns, particularly given that federal financial aid rules explicitly allow institutions to make such adjustments. When campuses do not clearly communicate this option, students with higher-than-average educational expenses may be unaware that they can request a revision to their COA, limiting their access to additional financial aid for which they may be eligible.

## Variation in COA Adjustment Information Reflects Institutional Choice, Not a Legal Requirement

While the overall rate of campus websites including information about Cost of Attendance (COA) adjustments is relatively low, neither federal nor state law requires institutions to publicly post this information on a website. As a result, the variation across campuses reflects institutional discretion rather than compliance with a mandated standard. This suggests that campuses that do provide this information are making a deliberate choice to increase transparency and student access to financial aid options, while others may not be prioritizing communication of this important resource. Additionally, campuses that do not include this information may not have adequate resources to include it.

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## ANALYSIS FINDINGS

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### **COA Adjustment Information Is Often Difficult to Locate**

Even when campuses provide information about COA adjustments, it is often difficult to find on campus websites. In many cases, the information appears only as a subsection within broader “Special Circumstances” or “Professional Judgment” pages rather than as a clearly labeled COA adjustment process. Locating the relevant information often required using the website search bar, navigating through multiple layers of financial aid pages or reviewing financial aid forms pages where COA adjustment forms are posted. As a result, students who are not already aware of the option may have difficulty discovering that they can request an adjustment to their financial aid budget.

### **There is Significant Variation in Website Clarity**

College websites vary considerably in the level of detail and clarity provided about COA adjustments. Some campuses provide only brief references to possible adjustments, while others offer detailed descriptions of eligible expenses, documentation requirements, and submission procedures.

Across the three public higher education segments, University of California campuses provide the most detailed and accessible information, followed by California State University campuses, while community college websites tend to provide the least detailed public guidance on COA adjustments.

### **Most Campuses Do Not Disclose the Data Sources Used to Calculate COA**

Most campuses do not publicly explain how their Cost of Attendance (COA) budgets are developed or what data sources and assumptions are used. Across all three systems, 18% of campuses publish this information on their websites, including 17% of UC campuses, 26% of CSU campuses, and 22% of community colleges. Approximately one in three CSU campuses referenced the Student Expenses and Resources Survey (SEARS) conducted by the California Student Aid Commission as a source used to develop their COA budgets. SEARS is a statewide survey that estimates typical student living expenses and is commonly used to inform financial aid budget components such as housing, food, and transportation. However, most campuses did not identify any data sources or explain the assumptions used to calculate their COA estimates, leaving students with little information about how these figures were determined or whether they reflect local living costs.

### **COA Adjustment Processes Are Often Behind Student Portals**

CSU and UC campuses commonly use online forms that students must access through their individual campus accounts to request COA adjustments. Because these forms are not publicly accessible, it is not possible to determine from campus websites what documentation is required, what expenses may qualify, or how long the review and decision-making process takes. This limits transparency about how COA adjustments are administered and makes it difficult for students to understand the process before initiating a request. This also limits the information accessible to prospective students who are considering attending the institution and are highly reliant on financial aid.

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## ANALYSIS FINDINGS

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### **COA Adjustment Processes Are Described Using Different Terminology**

Across campuses, the process for revising a student's Cost of Attendance is described using a variety of terms, including COA adjustments, budget increases, appeals, and professional judgment reviews. Some campuses also continue to use the older term "Budget Increase Request." This inconsistent terminology may make it more difficult for students to recognize that these processes serve the same purpose.

### **COA Adjustment Information Often Emphasizes Additional Loan Eligibility**

Many campuses explicitly state that increasing a student's Cost of Attendance (COA) will not result in additional grant aid and will instead only expand eligibility for loans, and some go further by requiring students to accept all federal Direct Loans before processing an appeal. This framing has important implications for student access. By emphasizing borrowing as the primary outcome, campuses may discourage students from pursuing a COA adjustment, even when they face legitimate higher education-related expenses. In addition, conditioning the appeal process on loan acceptance may create a barrier for students who do not wish to take on debt, effectively limiting access to a process intended to ensure that financial aid budgets accurately reflect students' actual costs. Taken together, these practices risk undermining the purpose of COA adjustments and may disproportionately impact low-income students and those with foster care experience, who are more likely to face financial hardship and be sensitive to additional debt.

### **UC Campuses Provide the Most Transparent Information on COA Adjustment Processes**

Among California's three public higher education segments, University of California campuses generally provide the most comprehensive and accessible information about COA adjustment processes. UC financial aid websites commonly include dedicated pages explaining how students may request an adjustment, the types of expenses that may qualify, the documentation required, and how requests are submitted.

### **UC Cost of Attendance Budgets are Developed Using a Systemwide Methodology**

The University of California campuses develop Cost of Attendance budgets using a systemwide methodology rather than being independently set by each campus. This information was found on two UC campus websites. The UC Office of the President administers the Cost of Attendance Survey (COAS) every two years to estimate student living expenses and inform key components of the COA. This indicates that the UC Office of the President plays a central role in shaping COA budgets across the system. As a result, strengthening the COAS may represent a strategic opportunity to improve the accuracy of COA calculations statewide. A document summarizing this methodology was publicly available on two of the nine UC campus websites.

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## ANALYSIS FINDINGS

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### **UC Campuses Identify a Broad Range of Eligible Expense Categories**

UC campuses generally listed a broad range of expenses that may qualify for a COA adjustment. In addition to commonly cited categories such as childcare, computer purchases, medical expenses, and transportation costs, many UC campuses include a category such as “other educational expenses” or “other documented costs.” Given this, the issue of categories does not appear to be a problem at the UC level. In contrast, community college and CSU campuses include a similarly broad range of categories at lower rates, approximately 50 percent for community colleges and 36 percent for CSUs. This raises concerns about how students interpret eligibility. When campuses present only a limited set of categories without indicating flexibility, students may reasonably assume that only the listed expenses qualify. As a result, students with legitimate but unlisted expenses may be discouraged from requesting a COA adjustment altogether. For example, if a student has experienced increased health costs, but either “health-related” or “other” is not listed, the student may interpret this to mean that such expenses are not eligible for consideration and may decide not to pursue a COA adjustment.

### **Most Campuses Comply with Prior Housing Cost Transparency Requirements**

A majority of CSU campuses referenced AB 990 (2017) and SB 467 (2019) on their Cost of Attendance webpages. These laws require CSU campuses, and request UC campuses, to provide more transparent information about estimated cost of attendance and local housing costs, including the market cost of off-campus housing and the methods used to calculate those estimates. These requirements are intended to help students better understand the total cost of attending college.

### **COA Adjustment Information Appears to Assume Prior Knowledge**

Even when campuses provided information about Cost of Attendance (COA) adjustments, the language used on websites often assumed that students already understand what a COA adjustment is and when it may apply to their situation. Descriptions were frequently brief, with little explanation of how a COA adjustment could help a student whose actual educational expenses exceed the standard budget. As a result, students who are unfamiliar with financial aid terminology may not recognize that this option exists or that they may need to request a COA adjustment.

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## ANALYSIS FINDINGS

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### Websites Alone Are Unlikely to Fully Inform Students About COA Adjustments

The websites reviewed contained large volumes of information covering many aspects of campus life and financial aid. While some campuses include information about Cost of Attendance (COA) adjustments, it is typically embedded within extensive financial aid content that can be difficult for students to navigate. As a result, relying solely on website information is unlikely to be sufficient to ensure that students understand when and how to request a COA adjustment. As such, establishing noticing requirements on campus websites will not likely fully achieve the goal of increasing access to Cost of Attendance appeals.



# Methodology

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This analysis evaluates the transparency of publicly posted information about Cost of Attendance (COA) adjustment processes across California's three systems of higher education. The review focuses on whether students can easily identify and understand how to request adjustments to their COA budgets when their actual educational expenses exceed the standard budget. The review includes all California Community Colleges listed in the California Community Colleges Chancellor's Office system directory (116 campuses), the California State University system (23 campuses) and the nine-campus University of California system. Each campus was evaluated individually, even when campuses belong to the same district, because websites and processes are often campus-specific.

## Data Collection

For each campus, the following steps were taken:

1. Locate the campus webpage.
2. Search the website for information related to Cost of Attendance, budget increase requests, professional judgment, or COA appeals/adjustments.
3. Review COA pages, financial aid forms pages, appeals pages, financial aid handbooks, and policy documents when available.
4. Record the specific webpage where COA adjustment information is described, if such a page exists.

## Measures

Each campus website was evaluated using five indicators related to the transparency of the COA adjustment process:

1. Posts information about the COA appeal process somewhere on their website.
2. Publishes data sources or assumptions used to calculate COA budgets
3. Identifies a broad range of expenses that may justify a COA adjustment
4. Allows electronic or paper submission of documentation
5. Indicates that a decision will be issued within 30 days

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## METHODOLOGY

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### Scoring Approach

Each indicator was scored using a binary system:

**1** = Information is publicly available on the campus website

**0** = Information was not identified on the campus website

### Scoring Definitions

#### *Clearly Posted COA Adjustment Process*

**1** = The website states that students may request a Cost of Attendance adjustment, appeal, or budget increase and provides instructions, a form, or contact information to initiate the request.

**0** = No public statement that students can request a COA adjustment.

#### *COA Methodology Transparency*

**1** = The website identifies data sources or assumptions used to construct the COA budget (e.g., CSAC SEARS survey, Bureau of Labor Statistics, local housing data).

**0** = COA amounts are listed but no explanation of how they were calculated.

#### *Broad Range of Eligible Expenses*

**1** = The website lists multiple types of expenses that may justify a COA adjustment, such as childcare, computer purchase, medical expenses, transportation costs, disability expenses, dependent care, or housing adjustments.

**0** = The website does not provide examples, or provides only 2 to 3 examples or only vague language such as 'special circumstances.'

#### *Documentation Submission Options*

**1** = The website clearly allows electronic submission or paper submission of documentation (e.g., online forms portal, document upload, email submission, or in-person submission).

**0** = The website does not state that electronic submission or paper submission of documentation is allowed.

#### *Decision Timeline*

**1** = The website states that COA appeal decisions are issued within 30 days or less (e.g., 'processing time: 2–4 weeks').

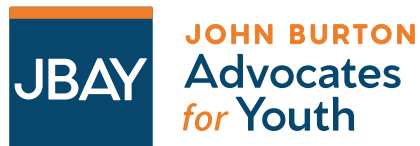
**0** = The website does not post a decision timeline.

### Limitations

This review evaluates website transparency, not institutional practice. A campus may offer COA adjustments administratively even if the process is not clearly described on the public website. In addition, campuses may provide additional information through student portals or direct communication with financial aid offices that was not visible during this review. Only publicly available website content was evaluated. Information available exclusively through student portals or internal documents was not considered.



John Burton Advocates for Youth improves the quality of life for youth in California who have been in foster care or homeless by advocating for better laws, training communities to strengthen local practices and conducting research to inform policy solutions.



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