

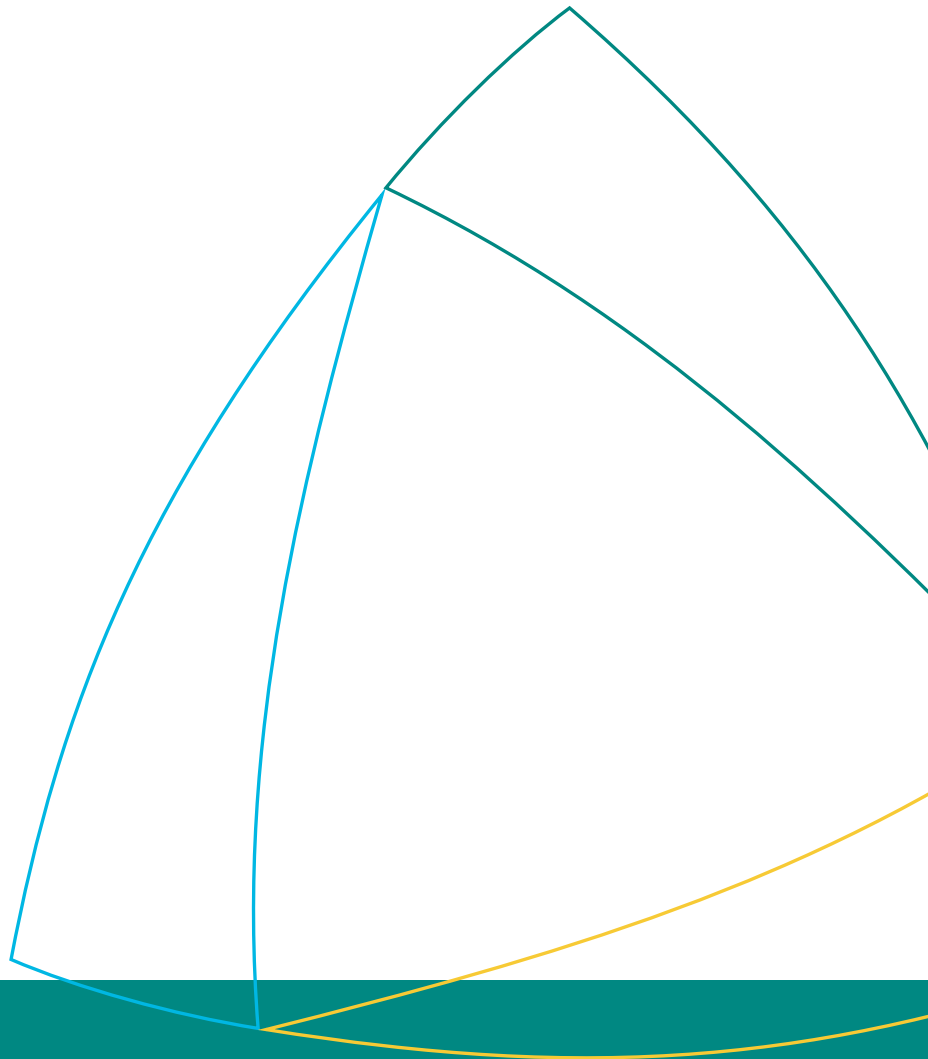


SHEEO

STATE HIGHER EDUCATION EXECUTIVE OFFICERS ASSOCIATION

NATIONAL AND STATE IMPACTS OF FAFSA SIMPLIFICATION

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The FAFSA Impact Tool and detailed examples of state grant program changes are available on our website (sheeo.org/project/fafsa-simplification).

The data in the report and accompanying website may be freely used with the appropriate attribution and citation: Burns, R. (2023) *National and State Impacts of FAFSA Simplification*. State Higher Education Executive Officers Association. sheeo.org/wp-content/uploads/2023/10/ImpactsofFAFSASimplification.pdf

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OVERVIEW OF SIMPLIFICATION

The United States Congress passed the Free Application for Federal Student Aid (FAFSA) Simplification Act in December 2020 with the aim of simplifying the process of applying for federal financial aid.¹ The changes mandated by the legislation represent the most significant overhaul of the federal financial aid process since the early Higher Education Acts. In the years following the passage of the Act, changes to the FAFSA form, federal financial aid formula, and institutional policies are to be implemented no later than the 2024-25 academic year. The primary purpose of simplification is twofold: to make the process of applying for federal aid simpler and more accessible and to make financial aid eligibility more transparent and predictable for students and their families. The amendments to the FAFSA form and financial aid formula mandated by the Simplification Act have been broadly celebrated, as they are anticipated to increase both the accessibility to and transparency of the federal financial aid process.

The positive changes in the FAFSA Simplification Act that will expand access to federal financial aid include:

- Lifting prohibitions for students with drug convictions.
- Lifting prohibitions for students who fail to register for Selective Service.
- Restoring lifetime Pell eligibility for students who were affected by an institution closure.
- Restoring Pell eligibility for incarcerated students.

Another important change brought about by the Simplification Act is the transition from Expected Family Contribution (EFC) to Student Aid Index (SAI), which has been hailed as a descriptive, straightforward formula for determining financial aid eligibility. The SAI contains fewer data elements than the EFC, and a larger percentage of these elements can be retrieved directly from the Internal Revenue Service (IRS).

Despite the largely positive reception of these changes, the full implications of simplification are still uncertain. Some changes to the federal methodology may shift a student's eligibility in ways that are yet unknown, including:

- Aligning a student's family size determination with the IRS definition.
- Changes to the formulas for calculating assets and income protection allowances.
- Changes to the methods for identifying excludable income.
- No longer considering the number of family members in college in the formula.
- Removing the exclusion for small business and family farm assets.

At the state level, need-based financial aid programs are often directly connected to the federal financial aid process because they rely on data elements from the FAFSA and model their eligibility requirements on Pell eligibility. Changes to or elimination of questions on the FAFSA, changes in a student's expected out-of-pocket contribution (formerly EFC, now SAI), and changes in Pell eligibility can therefore affect state financial aid programs, policies, and award levels.

1. S.2667 - 116th Congress (2019-2020): FAFSA Simplification Act of 2019. (2019, October 22). www.congress.gov/bills/116th-congress/senate-bill/2667/text

As a nascent issue, much of the literature on FAFSA simplification is preliminary and speculative, given that the full effect of the changes will not be felt until the phased implementation is complete in 2024-25. Experts agree that simplification of the FAFSA form is critical to making the process more accessible and transparent, and some researchers have attempted to predict how simplification will impact Pell eligibility. Researchers at the Urban Institute have found that slightly more students will be eligible for federal financial aid, but that the distribution of Pell grant awards will not change, nor will the amount of aid students receive.² The American Association of Community Colleges reports that the majority of students will experience either no change or increases in Pell awards of at least \$100, while a very small percentage (less than 300,000 students) will experience decreases of the same amount.³ An analysis by the National Association of Student Financial Aid Administrators (NASFAA) found that removing the consideration of the number of family members in college will yield a more equitable process, despite acknowledging that some families will lose Pell eligibility after this change.⁴

Aside from some preliminary analyses, however, little predictive modeling has been done to anticipate how FAFSA simplification will affect specific states, sectors, and subpopulations of students, both in regard to Pell Grant eligibility/awards and state grant eligibility/awards. Through a grant-funded partnership between the State Higher Education Executive Officers Association (SHEEO) and the National Association of State Student Grant & Aid Programs (NASSGAP), we use national- and state-level data to explore and assess the stated aims as well as the unintended consequences of the FAFSA Simplification Act. The two primary goals of the study include: to assist state higher education agencies in predicting how federal and state financial aid eligibility will change nationally and in their state, and to identify unanticipated challenges or negative impacts associated with simplification.

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2. Blagg, K., & Chingos, M. (2021). *How will the new Pell Grant formula affect students?* Urban Institute. www.urban.org/urban-wire/how-will-new-pell-grant-formula-affect-students
 3. Baime, D., & Hermes, J. (2021). FAFSA simplification act - Title VII of CRRSA. American Association of Community Colleges. www.aacc.nche.edu/wp-content/uploads/2021/01/BaimeFAFSASimplificationSummary.pdf
 4. National Association of Student Financial Aid Administrators. *Removal of number in college yields more equitable, simple application process.* www.nasfaa.org/news-item/24567/Removal_of_Number_in_College_Yields_More_Equitable_Simple_Application_Process

DATA, MEASURES, AND METHODS

DATA SOURCES

High-level modeling of the impacts of FAFSA simplification at the national and state levels was conducted using data from the 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). The 2017-18 administration of NPSAS is a nationally and state representative cross-sectional study that represents the approximately 16.6 million undergraduate students who were enrolled during the 2017-18 academic year in U.S. Title IV eligible institutions. The main purpose of the NPSAS dataset is to explore how students and their families finance postsecondary education through grants, loans, scholarships, and personal financial resources. NPSAS also contains a wide variety of student demographics and institutional characteristics. State-representative data are available for 30 states overall, 36 states at the public 2-year level, and 45 states at the public 4-year level. From this NPSAS sample, we analyzed students who applied for federal financial aid in the 2016-17, 2017-18, or 2018-19 academic years and had a valid FAFSA on file.

While NPSAS data provide an important overview of national and state trends, NPSAS is a sample survey and subsequently has some data limitations when analyzing detailed state-level changes. As an alternative to the state-level NPSAS data, several state agencies shared their Institution Student Record Information (ISIR) data with SHEEO staff to provide more detailed state-level analysis. Data were collected from Kentucky, Missouri, Nebraska, New Jersey, and North Carolina. Only students who applied for federal financial aid in the most recent academic year (usually 2021-22 or 2022-23) and had a valid FAFSA on file were included in the sample. Personally identifiable information (PII) was removed from student data files, leaving only the elements of FAFSA that are essential for calculating a student's expected SAI and Pell Grant award. See *Appendix A* for the list of data elements required to calculate SAI.

Limitations in NPSAS include the lack of state-representative data for some states, no variable indicating Pell eligibility, and missing FAFSA data elements. To mediate these limitations, this report provides results at the national level rather than the state level, uses a formula to estimate Pell eligibility regardless of actual Pell dollars received, and uses multiple years of FAFSA data to account for missing or incomplete FAFSA records. Limitations in state ISIR data include lack of student demographics, students with "rejected" dependency statuses, and missing FAFSA data elements. To mediate these limitations, students with rejected dependency status or insufficient FAFSA data were dropped from the analyses.

One significant limitation in all FAFSA data is the lack of asset information for students' small businesses and family farms. As previously noted, the 2024-25 FAFSA eliminates the existing exclusion of small businesses and family farms from students' asset calculations. Because students with businesses or farms employing less than 100 employees were not previously required to report these assets, there are no data elements in FAFSA measuring the values of these assets. As a result, family assets are underreported for students with family farms and small businesses that were previously excludable. Depending on the value of these assets, these students are likely to have real SAI values much higher than the SAI values calculated in this report and are likely to have much lower actual Pell Grant awards.

METHODS

Both NPSAS:18-AC and state ISIR data were run through a Stata program written by Iowa College Aid⁵ and adapted by SHEEO. The program follows the federal methodology as described by Federal Student Aid⁶ and is based on the current best interpretation of the guidelines set forth in the FAFSA Simplification Act. The SAI formula is distinct for dependent students, independent students without dependents, and independent students with dependents. The output from the federal methodology program is an estimated SAI for each student who completed a FAFSA.

NPSAS financial variables (e.g., adjusted gross income, federal income taxes paid) were adjusted to 2021 dollars to match the prior-prior year income used in the 2023-24 academic year FAFSA. State-level ISIR data were not adjusted and were instead pulled from the most recent academic year available (usually 2021-22 or 2022-23).

Following calculation of SAI, SHEEO staff estimated a student's expected Pell Grant based on SAI. For both the NPSAS:18-AC data and the state-level ISIR data, Pell Grant awards were estimated using the midpoint of \$100 bands of SAI. A student's total Pell Grant was calculated as the maximum Pell award for that year (e.g., \$6,435 in 2020-21) minus the assigned SAI midpoint. For an example calculation, see *Appendix B*. Students with flags for automatic-zero EFC and automatic-zero SAI were awarded maximum Pell Grants, while students eligible for minimum Pell Grants were awarded the annual statutory minimum amount. Pell Grants for the NPSAS population were estimated using 2023-24 Pell Grant and EFC maximums (i.e., \$7,395 maximum Pell Grant and \$6,656 maximum EFC). Pell Grants for state-level populations were estimated using the maximum Pell Grant and EFC for the corresponding academic year. All Pell Grants are estimated for a full-time student with cost of attendance (COA) greater than the maximum Pell Grant award.⁷

MEASURES

The three most important measures from the analysis include: the difference between EFC and estimated SAI; the difference between current Pell Grant awards and estimated new Pell Grant awards; and the change in Pell eligibility. Student EFC is included in the NPSAS dataset and in the ISIR data and does not need to be calculated. Current Pell Grant awards are not reported in ISIR data and were estimated using EFC and the midpoint formula described above. Although current Pell Grant awards are reported in NPSAS, the variable captures dispersed Pell awards rather than eligibility based on EFC. Pell awards for the NPSAS population were therefore estimated using the midpoint formula and may differ from the disbursed Pell variable captured in NPSAS (*pellamt*). Pell eligibility was determined by the level of calculated Pell Grants using EFC and SAI (i.e., students were considered eligible if their calculated Pell Grant was greater than \$0).

Additional measures of interest in the NPSAS dataset include student demographics such as dependency status, sex, race/ethnicity, and number of family members in college. ISIR data also permitted analyses by dependency status, number of family members in college, and receipt of state grant awards (when available). When possible, NPSAS and ISIR data were disaggregated by institutional sector (public 2-year, public 4-year, and private institutions). The following sections report national results separately for dependent and independent students. For additional analysis by student demographics, state, and institution sector, please visit our interactive map of results.⁸

5. iowacollegeaid.gov

6. fsapartners.ed.gov/sites/default/files/2022-11/202425DraftStudentAidIndexSAIandPellGrantEligibilityGuide.pdf

7. For an alternative approach to estimating Pell Grants in 2017-18, see *Appendix B*.

8. public.tableau.com/app/profile/sheeo/viz/FAFSAImpactTool/Sheet2

CHANGES IN STUDENT AID INDEX

NATIONAL ESTIMATES

At the national level, dependent students exhibit a bimodal distribution of EFC and SAI: 31.4% of students have an EFC of \$0, while 23.5% have an EFC greater than \$15,000; similarly, 50.8% are estimated to have an SAI less than or equal to \$0, while 24.1% are estimated to have an SAI greater than \$15,000 (*Table 1*). Large percentages of low-EFC students are anticipated to have a decrease in SAI relative to EFC to a value below \$0, including 73.2% of students with \$0 EFC, 55.6% of students with \$1–\$1,000 EFC, and 48.3% of students with \$1,001–\$3,000 EFC. The largest percentages of high-EFC students are anticipated to have an SAI value above \$15,000, including 39.9% of students with \$11,001–\$13,000 EFC, 43.9% of students with \$13,001–\$15,000 EFC, and 88% of students with EFC greater than \$15,000.

TABLE 1
EFC AND SAI CROSSTABULATIONS FOR DEPENDENT STUDENTS

STUDENT AID INDEX	EXPECTED FAMILY CONTRIBUTION										TOTAL
	\$0	\$1-\$1,000	\$1,001-\$3,000	\$3,001-\$5,000	\$5,001-\$7,000	\$7,001-\$9,000	\$9,001-\$11,000	\$11,001-\$13,000	\$13,001-\$15,000	>\$15,000	
<\$0	73.2%	55.6%	48.3%	13.3%	3.5%	2.3%	2.0%	1.2%	1.0%	0.7%	34.6%
\$0	26.3%	43.7%	28.2%	7.4%	3.5%	3.4%	1.1%	0.8%	0.4%	0.5%	16.2%
\$1-\$1,000	0.2%	0.2%	15.1%	24.4%	4.7%	1.3%	0.6%	1.0%	0.3%	0.1%	4.0%
\$1,001-\$3,000	0.1%	0.2%	6.8%	37.6%	33.6%	6.9%	2.5%	1.4%	1.7%	0.4%	6.1%
\$3,001-\$5,000	0.1%	0.1%	0.6%	11.8%	27.2%	26.7%	10.2%	2.7%	1.0%	0.2%	4.0%
\$5,001-\$7,000	0.0%	0.0%	0.4%	2.9%	14.0%	20.2%	25.5%	9.8%	3.1%	0.2%	3.0%
\$7,001-\$9,000	0.0%	0.1%	0.1%	1.0%	6.6%	11.5%	12.3%	22.7%	13.2%	0.5%	2.4%
\$9,001-\$11,000	0.0%	0.0%	0.1%	0.7%	2.3%	9.8%	5.1%	12.1%	21.2%	1.7%	2.0%
\$11,001-\$13,000	0.0%	0.1%	0.1%	0.2%	1.5%	7.3%	8.9%	3.9%	10.9%	3.6%	1.9%
\$13,001-\$15,000	0.0%	0.0%	0.1%	0.2%	1.0%	3.1%	11.7%	4.3%	3.2%	4.1%	1.7%
>\$15,000	0.2%	0.0%	0.1%	0.5%	2.2%	7.6%	20.2%	39.9%	43.9%	88.0%	24.1%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

NOTES:

1. The Expected Family Contribution (EFC) is reported in NPSAS:18-AC data.
2. The estimated Student Aid Index (SAI) is calculated using the methodology described herein.
3. EFC and SAI are indexed for inflation to 2023-24 values.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

Overall, 17.7% of dependent students are expected to experience an increase from EFC to SAI, 74.1% are expected to experience a decrease, and 8.2% are expected to have an SAI equal to EFC. The largest percentages of dependent students are anticipated to have a decrease in SAI relative to EFC of \$1,000–\$2,500 (39.7%) or \$2,500–\$5,000 (20.5%) (Table 2).

TABLE 2
SAI CHANGE FREQUENCIES BY DEPENDENCY STATUS

STUDENT AID INDEX DIFFERENCE	DEPENDENT	INDEPENDENT
MORE THAN -\$5,000	7.2%	3.1%
-\$2,500 TO -\$5,000	20.5%	8.6%
-\$1,000 TO -\$2,500	39.7%	63.1%
-\$751 TO -\$1,000	1.6%	0.7%
-\$501 TO -\$750	1.3%	0.5%
-\$401 TO -\$500	0.5%	0.2%
-\$301 TO -\$400	0.6%	0.3%
-\$201 TO -\$300	0.5%	0.2%
-\$101 TO -\$200	0.7%	0.3%
-\$1 TO -\$100	1.5%	0.3%
\$0	8.2%	19.7%
\$1 TO \$100	0.2%	0.1%
\$101 TO \$200	0.2%	0.1%
\$201 TO \$300	0.2%	0.1%
\$301 TO \$400	0.2%	0.1%
\$401 TO \$500	0.2%	0.1%
\$501 TO \$750	0.5%	0.2%
MORE THAN \$750	16.2%	2.3%

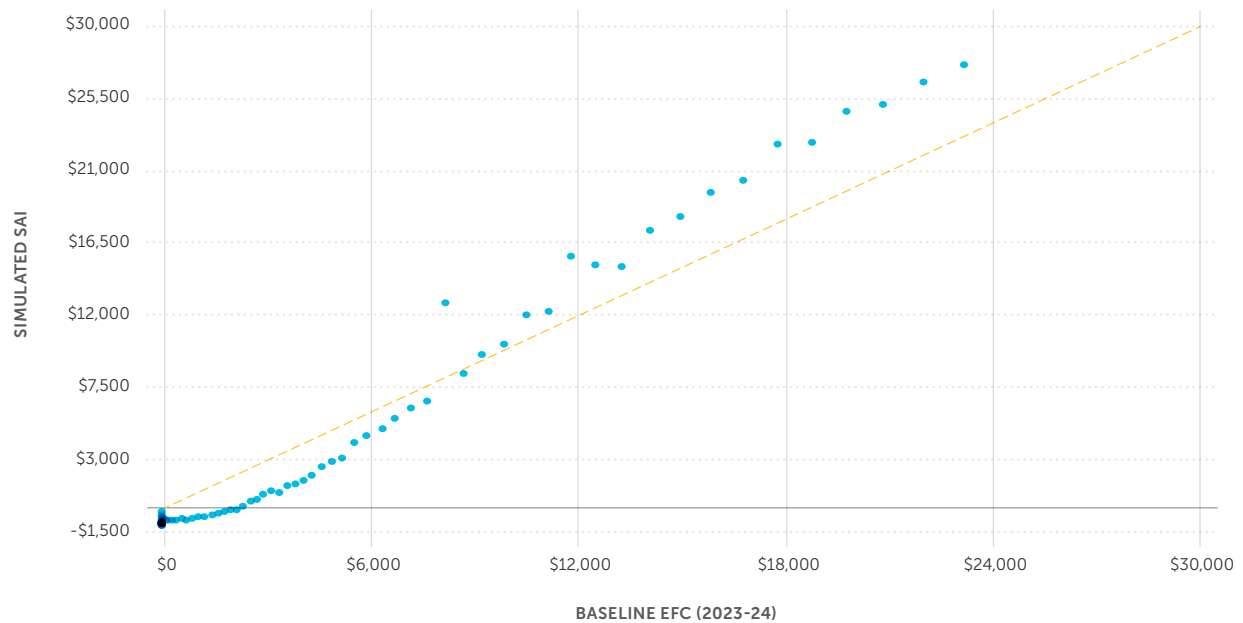
NOTES:

1. SAI Difference is the value of EFC minus SAI. Negative SAI differences indicate that SAI is expected to be lower than EFC. Positive SAI differences indicate that SAI is expected to be higher than EFC.
2. The Expected Family Contribution (EFC) is reported in NPSAS:18-AC data.
3. The estimated Student Aid Index (SAI) is calculated using the methodology described herein.
4. EFC and SAI are indexed for inflation to 2023-24 values.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

Dependent students with EFC values below about \$10,000 are expected to have a lower SAI compared to EFC, particularly for students with EFC values below \$5,000 (*Figure 1*). For students with EFC values greater than \$10,000, SAI is likely to outpace EFC by higher amounts as EFC increases.

FIGURE 1
SIMULATED SAI AND BASELINE EFC FOR DEPENDENT STUDENTS



NOTES:

1. The dashed line with a slope of 0 represents EFC equal to SAI.
2. Dots represent individual (weighted) students.
3. The baseline Expected Family Contribution (EFC) is reported in NPSAS:18-AC data and indexed for inflation to 2023-24 values.
4. The estimated Student Aid Index (SAI) is calculated using the methodology described herein.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

In contrast to dependent students, independent students do not have a bimodal distribution with a large percentage of students in EFC categories above \$15,000 (Table 3). A large percentage of independent students (61.1%) have a \$0 EFC, while 53.8% of students are estimated to have an SAI less than \$0. A smaller percentage of students (22.6%) are anticipated to have an SAI of \$0 given that the federal methodology does not have an automatic-zero SAI flag for independent students without dependents. The majority of low-EFC independent students are expected to experience an SAI decrease relative to EFC to a value less than \$0, including 67.7% of \$0 EFC students, 81.1% of \$1-\$1,000 EFC students, and 59.5% of \$1,001-\$3,000 EFC students.

TABLE 3
EFC AND SAI CROSSTABULATIONS FOR INDEPENDENT STUDENTS

STUDENT AID INDEX	EXPECTED FAMILY CONTRIBUTION										TOTAL
	\$0	\$1-\$1,000	\$1,001-\$3	\$3,001-\$5	\$5,001-\$7	\$7,001-\$9	\$9,001-\$1	\$11,001-\$	\$13,001-\$	>\$15,000	
<\$0	67.7%	81.1%	59.5%	16.1%	4.0%	2.7%	0.9%	1.0%	2.0%	3.1%	53.8%
\$0	32.2%	18.4%	10.3%	5.2%	4.1%	3.3%	2.1%	1.6%	1.3%	2.7%	22.6%
\$1-\$1,000	0.0%	0.3%	24.4%	11.7%	3.2%	0.7%	0.9%	0.1%	1.1%	0.2%	3.6%
\$1,001-\$3,000	0.0%	0.1%	5.5%	57.3%	17.2%	7.0%	1.8%	0.7%	0.1%	0.5%	5.9%
\$3,001-\$5,000	0.0%	0.0%	0.2%	8.3%	54.9%	14.9%	9.9%	4.9%	2.2%	0.4%	3.6%
\$5,001-\$7,000	0.0%	0.0%	0.1%	1.1%	12.1%	50.7%	13.7%	10.4%	7.0%	0.9%	2.5%
\$7,001-\$9,000	0.0%	0.0%	0.0%	0.2%	3.6%	13.2%	41.2%	12.9%	10.1%	3.1%	1.8%
\$9,001-\$11,000	0.0%	0.0%	0.0%	0.0%	0.3%	5.0%	14.9%	41.1%	15.4%	3.3%	1.4%
\$11,001-\$13,000	0.0%	0.0%	0.0%	0.0%	0.4%	1.6%	6.1%	8.8%	30.5%	4.2%	0.8%
\$13,001-\$15,000	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	3.6%	7.8%	8.1%	9.5%	0.7%
>\$15,000	0.0%	0.0%	0.0%	0.0%	0.3%	0.4%	4.8%	10.9%	22.1%	72.1%	3.3%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

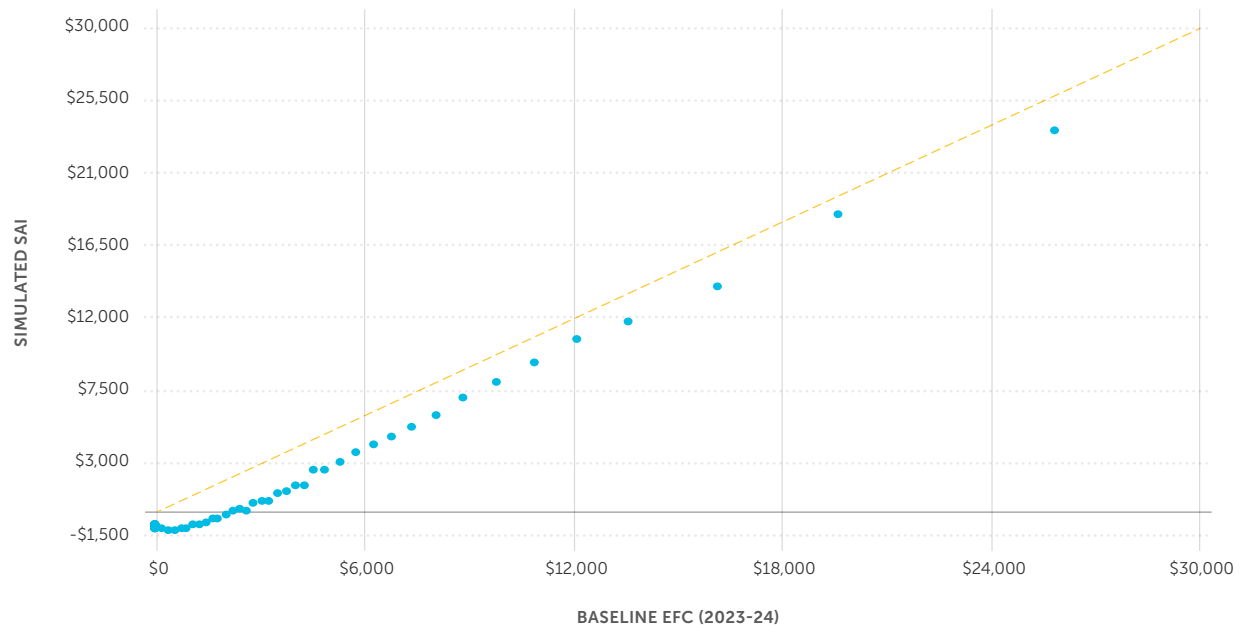
NOTES:

1. The Expected Family Contribution (EFC) is reported in NPSAS:18-AC data.
2. The estimated Student Aid Index (SAI) is calculated using the methodology described herein.
3. EFC and SAI are indexed for inflation to 2023-24 values.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

The majority of independent students (77.4%) are anticipated to have a decrease in SAI relative to EFC, with just 2.9% expected to have an increase. The majority of students (63.1%) are anticipated to experience a decrease in SAI of \$1,000-\$2,500 (Table 2). For all EFC values under \$30,000, independent students are expected to have, on average, SAI values lower than EFC (Table 4).

FIGURE 2
SIMULATED SAI AND BASELINE EFC FOR INDEPENDENT STUDENTS



NOTES:

1. The dashed line with a slope of 0 represents EFC equal to SAI.
2. Dots represent individual (weighted) students.
3. The baseline Expected Family Contribution (EFC) is reported in NPSAS:18-AC data and indexed for inflation to 2023-24 values.
4. The estimated Student Aid Index (SAI) is calculated using the methodology described herein.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

STATE SPOTLIGHT: NEW JERSEY

Students in New Jersey who completed a FAFSA for the 2022-23 academic year were analyzed to estimate the impact of the forthcoming change from EFC to SAI. State-wide, SAI is anticipated to be roughly \$3,000 lower than EFC.⁹ The largest decrease in SAI is anticipated for independent students without dependents (\$5,500 lower than EFC), followed by independent students with dependents (\$3,500 lower), and dependent students (\$1,700 lower than EFC). Among dependent students in New Jersey, SAI distribution is extremely bimodal: Roughly 35% of students are anticipated to have a negative SAI, while 43% are expected to have an SAI greater than \$15,000. In contrast, more than half (51%) of independent students without dependents and three-quarters (75%) of independent students with dependents are expected to have an SAI less than -\$1,500. These findings suggest that, on average, students in New Jersey will be eligible for greater amounts of need-based financial aid and will have lower out-of-pocket contributions.

9. Dollar values are reported in 2022-23 values.

CHANGES IN PELL GRANT AWARDS

NATIONAL ESTIMATES

Dependent students' Pell Grant receipt mirrors the bimodal distribution of SAI, with 32.6% of students receiving \$0 in Pell Grants and 36.6% receiving greater than \$7,000 under the current federal methodology (*Table 4*). Under the new formula, the percentage of students with \$0 Pell Grants is expected to remain roughly the same (31.1%) while the percentage of students with greater than \$7,000 is expected to increase to 52.5%. The majority of students with \$0 in Pell Grants under the current formula are expected to continue to have \$0 under the new formula (93.2%). In contrast, the majority of students with Pell Grants greater than \$4,000 are expected to receive more than \$7,000 under the new formula (between 58.5% and 99.6% of students in each \$1,000 band of Pell Grants).

TABLE 4
PELL GRANT CROSTABULATIONS FOR DEPENDENT STUDENTS

NEW PELL	OLD PELL								
	\$0	\$501-\$1,000	\$1,001-\$2,000	\$2,001-\$3,000	\$3,001-\$4,000	\$4,001-\$5,000	\$5,001-\$6,000	\$6,001-\$7,000	>\$7,000
\$0	93.2%	3.5%	11.0%	4.5%	1.1%	0.3%	0.1%	0.1%	0.1%
\$501-\$1,000	0.6%	25.9%	4.8%	1.3%	1.1%	0.8%	0.3%	0.5%	0.0%
\$1,001-\$2,000	2.3%	8.5%	9.2%	3.5%	2.0%	0.3%	0.2%	0.0%	0.0%
\$2,001-\$3,000	2.0%	11.5%	8.9%	7.1%	2.0%	0.6%	0.3%	0.0%	0.0%
\$3,001-\$4,000	1.0%	12.1%	11.9%	9.7%	5.5%	1.1%	0.1%	0.1%	0.0%
\$4,001-\$5,000	0.3%	11.8%	26.5%	15.0%	9.3%	4.0%	0.8%	0.1%	0.0%
\$5,001-\$6,000	0.0%	8.8%	13.3%	28.0%	21.4%	10.1%	1.8%	0.2%	0.1%
\$6,001-\$7,000	0.0%	3.5%	5.9%	19.2%	26.8%	24.2%	7.6%	0.3%	0.1%
>\$7,000	0.5%	14.2%	8.6%	11.7%	30.7%	58.5%	88.8%	98.7%	99.6%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

NOTES:

1. Eligibility for Pell Grants (old and new) is calculated using the methodology described herein.
2. Pell Grant award amounts are calculated using the 2023-24 Pell award tables.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

Most dependent students (62.8%) are expected to experience no change in their Pell Grant award, while 35.2% are anticipated to experience an increase in Pell Grants. Thirteen percent of students are anticipated to have a Pell Grant increase of \$1,000–\$2,500 while 9.7% are expected to have an increase of \$2,500–\$5,000 (Table 5). The largest dollar increases in Pell Grant awards are expected to be granted to students with an EFC between about \$4,000 and \$5,400 (Figure 3), although all students with baseline EFC values between about \$1,900 and \$7,500 may experience Pell Grant increases of about \$2,000.

TABLE 5
PELL CHANGE FREQUENCIES BY DEPENDENCY STATUS

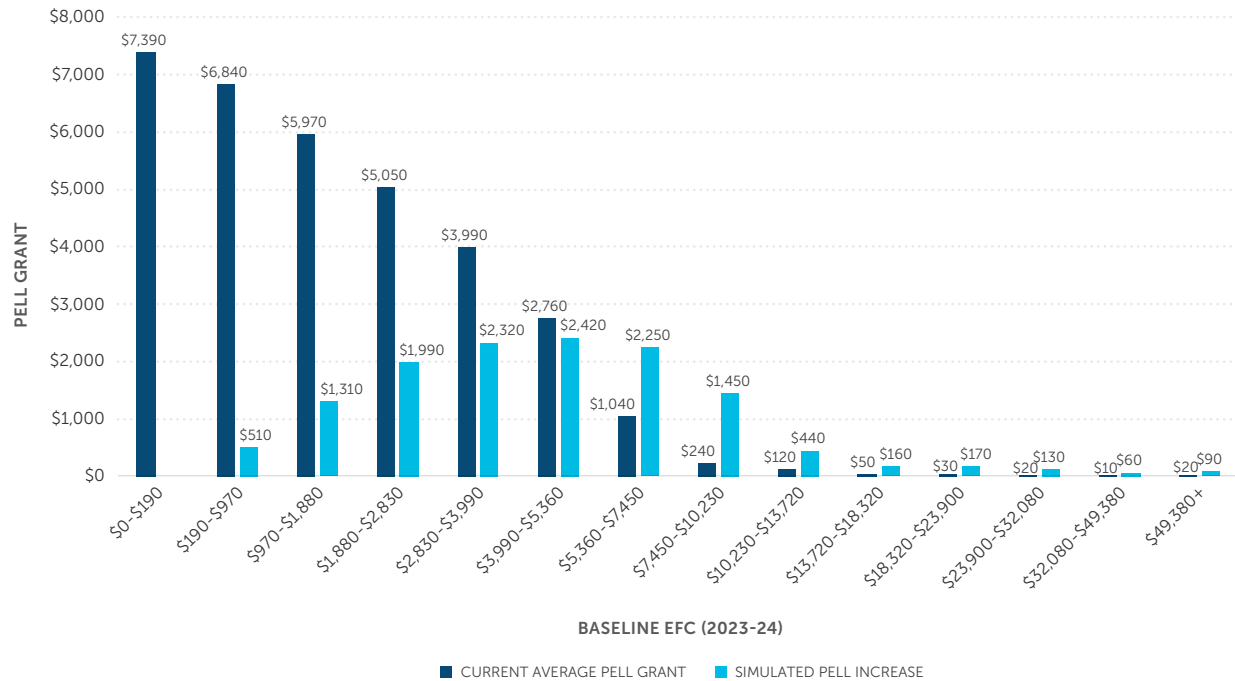
PELL DIFFERENCE	DEPENDENT	INDEPENDENT
MORE THAN -\$750	1.4%	0.3%
-\$501 TO -\$750	0.2%	0.1%
-\$401 TO -\$500	0.1%	0.0%
-\$301 TO -\$400	0.1%	0.0%
-\$201 TO -\$300	0.1%	0.1%
-\$101 TO -\$200	0.1%	0.0%
-\$1 TO -\$100	0.1%	0.1%
\$0	62.8%	69.2%
\$1 TO \$100	3.0%	0.8%
\$101 TO \$200	1.2%	0.8%
\$201 TO \$300	0.8%	0.6%
\$301 TO \$400	0.9%	0.8%
\$401 TO \$500	0.8%	0.7%
\$501 TO \$750	2.2%	1.9%
\$750 TO \$1,000	2.0%	1.5%
\$1,001 TO \$2,500	13.2%	16.9%
\$2,501 TO \$5,000	9.7%	5.2%
MORE THAN \$5,000	1.4%	1.1%

NOTES:

1. Pell Difference is the value of Pell (new) minus Pell (old). Negative Pell differences indicate that Pell (new) is expected to be lower than Pell (old). Positive Pell differences indicate that Pell (old) is expected to be higher than Pell (new).
2. Eligibility for Pell Grants (old and new) is calculated using the methodology described herein.
3. Pell Grant award amounts are calculated using the 2023-24 Pell award tables.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

FIGURE 3
ESTIMATED INCREASE IN PELL GRANT AWARDS FOR DEPENDENT STUDENTS



NOTES:

1. Baseline Expected Family Contribution (EFC) as reported in NPSAS:18-AC is divided into 20th percentiles and indexed for inflation to 2023-24 values.
2. Eligibility for Pell Grants (old and new) is calculated using the methodology described herein.
3. Pell Grant award amounts are calculated using the 2023-24 Pell award tables.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

The distribution of dependent students who are or are not eligible for Pell Grants leans more heavily in favor of eligibility under the new formula. Just 1.1% of dependent students (49,700 students) who were eligible under the current formula are anticipated to lose Pell eligibility, while 6.8% are expected to gain Pell eligibility (154,470 students) (*Table 6*).¹⁰

10. The findings in this report differ slightly from the findings presented in the SHEEO Modeling Webinar on March 1, 2023. The findings from March 1 reported Pell awards based on the NPSAS variable *pellamt*, which does not account for Pell-eligible students who did not receive any Pell funding. This report estimates Pell eligibility independent of the *pellamt* variable.

TABLE 6
CHANGE IN PELL ELIGIBILITY BY DEPENDENCY STATUS

	DEPENDENT	INDEPENDENT
LOSE PELL ELIGIBILITY	1.1%	0.2%
REMAIN PELL ELIGIBLE	98.9%	99.9%
GAIN PELL ELIGIBILITY	6.8%	26.9%
REMAIN PELL INELIGIBLE	93.2%	73.1%
PERCENT ELIGIBLE (OLD)	67.4%	91.2%
PERCENT ELIGIBLE (NEW)	68.9%	93.4%

NOTES:

1. Eligibility for Pell Grants (old and new) is calculated using the methodology described herein.
2. The denominator for Lose Pell Eligibility and Remain Pell Eligible is all students who were Pell-eligible under the old formula.
3. The denominator for Gain Pell Eligibility and Remain Pell Ineligible is all students who were not Pell-eligible under the formula.
4. The denominator for Percent Eligible (Old) and Percent Eligible (New) is all students.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

Independent students have, on average, high rates of receipt of Pell Grants under the current formula, with just 8.8% of students receiving \$0, compared to 63.6% of students receiving more than \$7,000 (Table 7). These rates are anticipated to shift even more heavily toward high Pell Grants under the new methodology, with 6.6% of students expected to receive \$0 in Pell Grants and 77.7% expected to receive more than \$7,000. The majority of students with Pell Grants greater than \$5,000 are expected to receive greater than \$7,000 under the new formula (between 90.0% and 99.9% of students in each \$1,000 band of Pell Grants).

TABLE 7
PELL GRANT CROSSTABULATIONS FOR INDEPENDENT STUDENTS

NEW PELL	OLD PELL									TOTAL
	\$0	\$501-\$1,000	\$1,001-\$2,000	\$2,001-\$3,000	\$3,001-\$4,000	\$4,001-\$5,000	\$5,001-\$6,000	\$6,001-\$7,000	>\$7,000	
\$0	73.1%	1.7%	2.9%	0.3%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%
\$501-\$1,000	2.4%	46.9%	2.8%	0.4%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%
\$1,001-\$2,000	10.4%	6.5%	6.6%	1.8%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
\$2,001-\$3,000	8.0%	13.5%	14.1%	4.0%	0.8%	0.2%	0.0%	0.0%	0.0%	0.0%
\$3,001-\$4,000	1.1%	10.1%	43.5%	7.8%	3.3%	0.2%	0.2%	0.0%	0.0%	0.0%
\$4,001-\$5,000	0.9%	7.1%	10.8%	49.6%	7.6%	3.0%	0.2%	0.0%	0.0%	0.0%
\$5,001-\$6,000	0.5%	3.2%	7.0%	14.2%	48.9%	8.1%	1.5%	0.2%	0.0%	0.0%
\$6,001-\$7,000	0.5%	1.1%	4.2%	11.2%	14.0%	42.8%	8.0%	1.0%	0.0%	0.0%
>\$7,000	3.0%	9.9%	8.1%	10.7%	25.0%	45.5%	90.0%	98.6%	99.9%	99.9%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

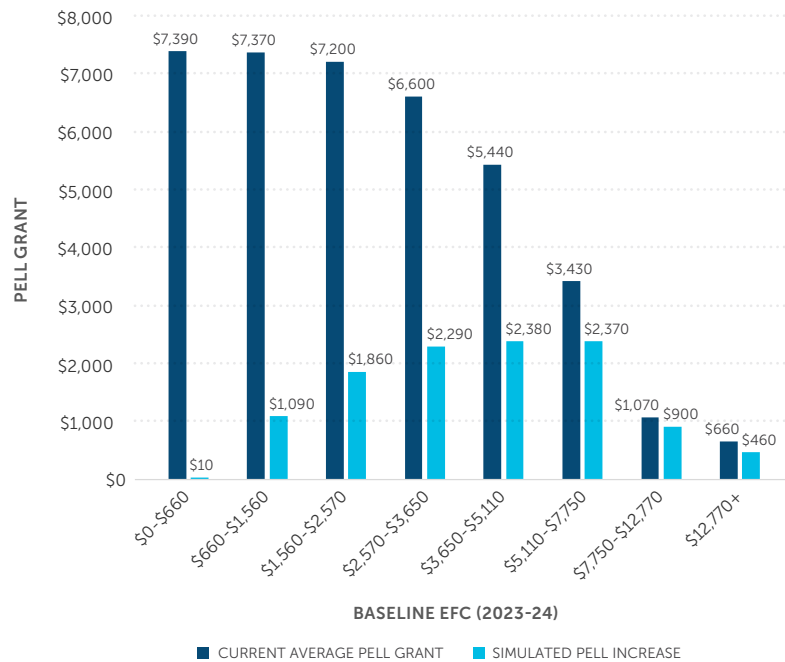
NOTES:

1. Eligibility for Pell Grants (old and new) is calculated using the methodology described herein.
2. Pell Grant award amounts are calculated using the 2023-24 Pell award tables.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

Most independent students (69.2%) are expected to experience no change in their Pell Grant award, while 30.2% are anticipated to experience an increase. For students who do experience an increase, the amount is expected to increase by \$1,000–\$2,500 for the largest percentage (16.9% of all independent students) (*Table 5*). The largest dollar increases in Pell Grant awards are expected to be granted to students with baseline EFC values between about \$2,500 and \$7,750, with increases ranging from about \$2,300 to \$2,400 (*Figure 4*).

FIGURE 4
ESTIMATED INCREASE IN PELL GRANT AWARDS FOR INDEPENDENT STUDENTS



NOTES:

1. Baseline Expected Family Contribution (EFC) as reported in NPSAS:18-AC is divided into 20th percentiles and indexed for inflation to 2023-24 values.
2. Eligibility for Pell Grants (old and new) is calculated using the methodology described herein.
3. Pell Grant award amounts are calculated using the 2023-24 Pell award tables.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

STATE SPOTLIGHT: KENTUCKY

Students in Kentucky who completed a FAFSA for the 2022-23 academic year were analyzed to estimate the impact of simplification on Pell Grant eligibility and award levels. Statewide, Pell Grant awards are estimated to increase by roughly \$500.¹¹ The largest increase in Pell Grant awards is anticipated for dependent students (\$560), followed by independent students without dependents (\$475) and independent students with dependents (\$425). The number of Pell-eligible students in Kentucky is expected to increase 16% among dependent students, 13% among independent students without dependents, and 4% among independent students with dependents. These findings suggest that students in Kentucky may be eligible for modest increases in the total number of Pell dollars awarded and the total number of students eligible for awards.

11. Dollar values are reported in 2022-23 values.

IMPACTS OF SIMPLIFICATION

FEDERAL PELL GRANT CHANGES

The anticipated impact of FAFSA simplification is largely positive for most students. Among all students, 13.1% are expected to experience no change in their SAI relative to EFC, 75.5% are likely to experience a decrease in SAI, and 11.4% may experience an increase in SAI (*Table 8*). Among students who may experience an increase in SAI, 87.6% were not eligible for Pell Grants under the existing formula, and 88.1% are expected to be ineligible under the new formula as well. This suggests that 33.2% of the Pell-eligible students anticipated to experience an increase in SAI will lose eligibility when the new methodology comes into effect (approximately 56,600 students).

TABLE 8
CHANGES IN SAI, PELL GRANT RECEIPT, AND TOTAL PELL DOLLARS BY DEPENDENCY STATUS

	DEPENDENT	INDEPENDENT	TOTAL
SAME SAI	8.3%	19.7%	13.1%
LOWER SAI	74.2%	77.4%	75.5%
HIGHER SAI	17.6%	2.9%	11.4%
SAME PELL	62.8%	69.2%	65.6%
LOWER PELL	2.0%	0.6%	1.4%
HIGHER PELL	35.2%	30.2%	33.1%
GAIN PELL	154,470	121,480	275,950
LOSE PELL	49,700	6,890	56,590
INCREASE IN PELL (ELIGIBILITY)	\$404,000,000	\$332,000,000	\$736,000,000
DECREASE IN PELL (ELIGIBILITY)	\$108,000,000	\$10,600,000	\$118,600,000
INCREASE IN PELL (TOTAL)	\$4,850,000,000	\$3,000,000,000	\$7,850,000,000
DECREASE IN PELL (TOTAL)	\$233,000,000	\$31,900,000	\$264,900,000

NOTES:

- Changes in SAI are equal to Student Aid Index (SAI) minus Expected Family Contribution (EFC). Lower SAI indicates that SAI is estimated to be lower than EFC. Higher SAI indicates that SAI is estimated to be higher than EFC.
- The Expected Family Contribution (EFC) is reported in NPSAS:18-AC data.
- The estimated Student Aid Index (SAI) is calculated using the methodology described herein.
- Changes in Pell Grants are equal to Pell Grant (new) minus Pell Grant (old). Lower Pell indicates that Pell (new) is estimated to be lower than Pell (old). Higher Pell indicates that Pell (new) is estimated to be higher than Pell (old).
- Eligibility for Pell Grants (old and new) is calculated using the methodology described herein.
- Pell Grant award amounts are calculated using the 2023-24 Pell award tables.
- The Increase in Pell (eligibility) estimates the total amount of new Pell awards granted to previously ineligible students. The Decrease in Pell (eligibility) estimates the total amount of foregone Pell awards for students who were previously eligible and became ineligible.
- The Increase in Pell (total) estimates the sum of increased Pell awards for all eligible students. The Decrease in Pell (total) estimates the sum of decreased Pell awards for all eligible students.

SOURCE: 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC)

The changes in Pell Grant awards mirror the changes in SAI, with 65.6% of students expected to experience no change, 33.1% expected to experience an increase in their Pell award, and 1.4% expected to experience a decrease. Overall, just 0.6% of students who were eligible for Pell Grants under the current formula are anticipated to lose eligibility (approximately 56,600 students). An additional 275,950 students, or 9.4% of students ineligible under the current formula, are anticipated to gain Pell eligibility. The total dollar value of the estimated increase in Pell awards for students who were previously ineligible is approximately \$736 million. This is partially offset by the loss of Pell eligibility equaling roughly \$118.6 million, resulting in a net increase of \$617.4 million in Pell dollars. When accounting for all increases in Pell awards (including awards to students who were previously eligible) and all lost Pell awards (including decreased awards for students who are still eligible), the net increase in Pell awards totals \$7.85 billion.

STATE GRANT PROGRAM CHANGES

The extent to which changes in the FAFSA formula will affect state grant programs depends on the structure of the state program. Different state approaches to state aid may include: first-dollar programs, last-dollar programs, programs that use EFC or SAI in the aid formula, and programs that award grants based on Pell eligibility.

First-dollar programs award grants to students prior to accounting for any other forms of aid received, including Pell Grants. These programs enable students to receive additional funding that exceeds the cost of attendance (for instance, to cover living expenses and transportation). Some college promise scholarships, such as the California College Promise Grant,¹² are first-dollar programs. Given the increase in student need as measured by SAI, first-dollar programs are the most likely type of state grant programs to be affected by FAFSA simplification, as students are likely to be eligible for greater amounts of financial aid from the state. In addition, more students are likely to have SAI values that qualify for grants; subsequently, the pool of students eligible for first-dollar grants is also likely to increase. States with first-dollar programs that have limited budgetary resources to expand the number and amount of state grant awards may wish to consider changes in award level caps, EFC/SAI limits, or the proportion of financial need programs are able to cover.

Last-dollar programs award grants to students after accounting for other forms of aid received, such as Pell Grants. Many of these programs reduce the amount of state financial aid a student is eligible to receive by the amount of Pell Grants and other scholarships. The majority of state grant programs, such as the Tennessee Promise,¹³ are last-dollar programs. The changes to last-dollar programs are the most challenging to predict. Results from this research suggest that more students will be eligible for more financial aid due to lower SAI values and more Pell-eligible students. However, the increase in Pell Grant awards and the increase in Pell Grant eligibility may have the effect of crowding out students' eligibility for state grants. A preliminary analysis suggests that the increase in Pell Grant dollars is expected to be equal to or greater than the decrease in SAI relative to EFC for 22.2% of students. States with last-dollar programs may need to consider changes to award level caps or EFC/SAI limits if larger numbers of students are anticipated to be eligible for larger state grant awards.

12. www.cccapply.org/en/money/california-college-promise-grant

13. www.tn.gov/tnpromise.html

Regardless of whether grants are awarded on a first-dollar or last-dollar basis, many state grant programs use a student's calculated EFC to estimate the amount of state grant dollars a student is eligible to receive. One important consideration for states is the existence of negative SAI values, compared to the minimum EFC of \$0. Negative SAI values may necessitate adjustments to state grant calculations to account for these negative values. In the state of Minnesota, for instance, a student's financial responsibility is recalculated as 79% of a student's EFC, which has the effect of reducing EFC by 21%. When SAI is negative, however, the 79% calculation has the effect of increasing SAI by 21%. To remedy this issue, the Minnesota state legislature passed a change in 2023 that specifies that the proration only applies to values of SAI greater than or equal to \$1, effective July 1, 2024. As the number of students with SAI values below the standard EFC cutoffs for state grant eligibility, states may want to consider the EFC/SAI cutoffs for eligibility, the amount of grant aid awarded per student, the methods used for adjusting EFC, or the maximum number of awards granted each year.

Some state grant programs tie state grant eligibility to Pell eligibility (e.g., students eligible for maximum Pell Grants may be eligible for a certain level of aid). As the number of students eligible for Pell Grants (both overall and at the maximum Pell Grant level) increases, the number of students eligible for state grant awards modeled on Pell eligibility is expected to increase as well. As with last-dollar programs, state grant awards for Pell-eligible students may be crowded out by the additional Pell dollars students will be eligible to receive. States with grant programs modeled on Pell eligibility may wish to consider how closely state grant eligibility is tied to Pell and make adjustments to the level of grant award for each level of Pell award.

STATE SPOTLIGHT: NORTH CAROLINA

Students in North Carolina who completed a FAFSA for the 2022-23 academic year were analyzed to estimate the impact of simplification on North Carolina need-based state grant awards. North Carolina has developed a consolidated state grant program for the 2023-24 school year that guarantees students state and federal aid if they have an AGI below \$75,000 and an EFC under \$7,500. Additional aid will be available for students with the lowest incomes. Among students at non-private institutions, the number of students eligible for the North Carolina consolidated state grant is anticipated to increase by approximately 4% if the EFC/SAI cutoff does not change when simplification is implemented. Among students at public 2-year institutions, an additional 6% of students are expected to become eligible, while another 2% are expected to become eligible at public 4-year institutions. In addition to more students becoming eligible for the North Carolina consolidated grant, students are also expected to receive greater Pell Grant awards. Students at non-private institutions who are currently eligible for the North Carolina consolidated grant are expected to receive an additional \$106 million in Pell Grants. These findings suggest that students could experience "savings" in Pell Grants that offset the anticipated increase in eligibility for the North Carolina consolidated award.

CONCLUSION

The simplification of the FAFSA form is primarily beneficial to students: Not only will students have fewer questions to complete on the FAFSA, but they will likely be eligible for more federal financial aid. The results of this research suggest that at the national level, nearly 220,000 net students would gain Pell eligibility in 2023-24, equivalent to a net increase of over \$617 million in Pell Grants. Coupled with the changes in Pell Grant awards for previously eligible students, total Pell Grant awards would be expected to increase by approximately \$7.85 billion in 2023-24.

While most students will see expanded eligibility and award levels, some uncertainties remain. Students with more than one family member in college may experience increases in SAI relative to EFC, and corresponding decreases in Pell eligibility and award amounts. These students make up some of the approximately 56,600 students that are anticipated to lose Pell eligibility. Similarly, students with family farms and small businesses that were previously exempt from EFC calculations may have significantly higher SAI values after the family farm exclusion is eliminated. Since our research cannot model the potential impacts of this change, we anticipate that we have underestimated the potential negative impacts of simplification.

Simplification may also pose challenges for state grant programs. The results of this research at the national level suggest that many students will have lower expected out-of-pocket costs for postsecondary education as indicated by the lower SAI values relative to EFC. Pell Grants may fill a large portion of this additional need, but many students will have unmet financial need that can be fulfilled through state grants or federal loans. While the ultimate balance of financial assistance is uncertain and unique to each state's circumstances and the grant programs available to students, this research quantifies the estimated impact for students at the national and state level.

APPENDIX A: ISIR DATA ELEMENTS FOR SAI CALCULATION

	DEPENDENT STUDENTS	INDEPENDENT STUDENTS WITHOUT DEPENDENTS	INDEPENDENT STUDENTS WITH DEPENDENTS
STATE OF RESIDENCE	X	X	X
DEPENDENCY STATUS	X	X	X
EXPECTED FAMILY CONTRIBUTION (EFC)	X	X	X
STUDENT IS CHILD OF 9/11 OR FALLEN HEROES	X	X	X
STUDENT DATE OF BIRTH OR AGE	X	X	X
PARENT FILING STATUS	X		
PARENT MARITAL STATUS	X		
PARENT 1 DATE OF BIRTH OR AGE	X		
PARENT 2 DATE OF BIRTH OR AGE	X		
PARENT HOUSEHOLD SIZE	X		
PARENT ADJUSTED GROSS INCOME (AGI)	X		
PARENT RECEIPT OF SUPPLEMENTAL SECURITY INCOME (SSI)	X		
PARENT RECEIPT OF FREE/REDUCED LUNCH	X		
PARENT RECEIPT OF TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)	X		
PARENT RECEIPT OF WOMEN, INFANTS, & CHILDREN (WIC)	X		
PARENT RECEIPT OF SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)	X		
PARENT UNTAXED INDIVIDUAL RETIREMENT ACCOUNT (IRA) INCOME	X		
PARENT UNTAXED INDIVIDUAL RETIREMENT ACCOUNT (IRA) DISTRIBUTIONS	X		
PARENT UNTAXED INTEREST INCOME	X		
PARENT OTHER UNTAXED INCOME	X		
PARENT EDUCATION CREDITS	X		
PARENT EDUCATION GRANTS	X		
PARENT INCOME TAX PAID	X		
PARENT 1 EARNED INCOME	X		
PARENT 2 EARNED INCOME	X		
PARENT CASH	X		
PARENT INVESTMENT NET WORTH	X		
PARENT NET WORTH FARM/BUSINESS	X		
PARENT CHILD SUPPORT RECEIVED	X		
STUDENT FILING STATUS	X	X	X
STUDENT ADJUSTED GROSS INCOME (AGI)	X	X	X
STUDENT UNTAXED INDIVIDUAL RETIREMENT ACCOUNT (IRA) INCOME	X	X	X
STUDENT UNTAXED INDIVIDUAL RETIREMENT ACCOUNT (IRA) DISTRIBUTIONS	X	X	X
STUDENT UNTAXED INTEREST INCOME	X	X	X
STUDENT OTHER UNTAXED INCOME	X	X	X

	DEPENDENT STUDENTS	INDEPENDENT STUDENTS WITHOUT DEPENDENTS	INDEPENDENT STUDENTS WITH DEPENDENTS
STUDENT EDUCATION GRANTS	X	X	X
STUDENT EDUCATION CREDITS	X	X	X
STUDENT INCOME TAX PAID	X	X	X
STUDENT EARNED INCOME	X	X	X
STUDENT CASH	X	X	X
STUDENT INVESTMENT NET WORTH	X	X	X
STUDENT NET WORTH FARM/BUSINESS	X	X	X
STUDENT CHILD SUPPORT RECEIVED	X	X	X
STUDENT RECEIPT OF SUPPLEMENTAL SECURITY INCOME (SSI)	X	X	X
STUDENT RECEIPT OF FREE/REDUCED LUNCH	X	X	X
STUDENT RECEIPT OF SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)	X	X	X
STUDENT RECEIPT OF TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)	X	X	X
STUDENT RECEIPT OF WOMEN, INFANTS, & CHILDREN (WIC)	X	X	X
STUDENT MARITAL STATUS		X	X
STUDENT HOUSEHOLD SIZE		X	X
SPOUSE EARNED INCOME		X	X
STUDENT NUMBER DEPENDENT CHILDREN			X
STUDENT NUMBER OTHER DEPENDENTS			X

APPENDIX B: APPROACHES TO PELL AWARD CALCULATIONS

There are two approaches to measuring 2023-24 Pell Grants for the NPSAS:18-AC population. The first approach, which was used in early modeling deliverables, used the NPSAS variable *pellamt*. This variable measures the total amount of Pell Grant dollars disbursed per student from the National Student Loan Data System (NSLDS) and does not accurately measure Pell Grant eligibility. A large percentage of students in 2017-18 NPSAS (approximately 24.4%) who were otherwise eligible for Pell Grants based on EFC received \$0 in Pell Grants. These students may have chosen not to file a FAFSA, declined an award, or had other eligibility restrictions. Because *pellamt* does not perfectly capture eligibility for Pell Grant awards, analyses using this variable to measure Pell receipt necessarily underestimate the number of eligible students. As a result, the change in Pell Grant receipt when using SAI compared to EFC is equally inflated.

The second approach, which was used in this report, estimates the total amount of Pell dollars students were eligible to receive using their EFC or calculated SAI and the 2023-24 Pell disbursement tables.¹⁴ The Pell disbursement tables assign an estimated Pell Grant award based on students' EFC (or SAI), cost of attendance (COA), and enrollment intensity (less-than-half-time, half-time, three-quarter-time, or full-time). SAI was substituted in place of EFC to estimate a student's Pell Grant award had it been based on SAI rather than EFC. This approach reduces the likelihood of overestimating the increase in the number and amount of Pell awards. However, it is limited by the inability to capture other reasons for ineligibility (i.e., not enrolling for Selective Service, prior drug convictions, etc.).

14. fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2023-01-26/2023-2024-federal-pell-grant-payment-and-disbursement-schedules

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