

# Toward a More Equitable Future for Postsecondary Access



**NACAC**

 **NASFAA**  
NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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# Acknowledgements

We would like to thank Lumina Foundation for their generous support of this important research. We would also like to thank the students who participated in interviews and the members of the thought leadership panel:

- **Kendra Allen**, associate director of financial aid special programs, Northern Virginia Community College
- **Tanya Ang**, senior advocacy director, Higher Leading Advocates (DC)
- **Daniel Barkowitz**, assistant vice president of financial aid and veterans' affairs, Valencia College (FL)
- **José Bowen**, senior fellow, Association of American Colleges and Universities (DC)
- **Alexander Clark**, founder and chief executive officer, Technolutions (CT)
- **Art Coleman**, managing partner and co-founder, EducationCounsel (DC)
- **Shirley M. Collado, Ph.D.**, President Emerita, Ithaca College, President & CEO, College Track
- **Youlonda Copeland-Morgan**, vice provost, enrollment management, University of California, Los Angeles
- **David Follick**, dean of admission, Nassau Community College (NY)
- **Kristen Harris**, senior director of college and career success, New York City Department of Education
- **Emily House**, executive director, Tennessee Higher Education Commission and Tennessee Student Assistance Corporation
- **Janet Marling**, executive director, National Institute for the Study of Transfer Students (GA)
- **Stephanie McGencey**, executive director, American Youth Policy Forum (DC)
- **Joseph Montgomery**, vice president for enrollment management and student success, Tuskegee University (AL)
- **David Page**, vice president for enrollment management, Dillard University (LA)
- **Daniel Phelan**, president, Jackson College (MI)
- **OiYan Poon**, associate professor affiliate of educational policy studies, University of Illinois at Chicago
- **Brian Sponsler**, vice president of policy, Education Commission of the States (CO)
- **Michael Turnage Young**, senior counsel, NAACP Legal Defense and Educational Fund, Inc. (NY)
- **Don Yu**, chief operating officer, Reach Higher at The Common Application (VA)



In addition, we are grateful to the team at Hearken for their work on this project.

The financial aid policy considerations contained within are those of the National Association of Student Financial Aid Administrators (NASFAA) and do not necessarily reflect positions or policies of Lumina Foundation, the thought leadership panel, or NACAC. The admission policy considerations contained within are those of the National Association for College Admission Counseling (NACAC) and do not necessarily reflect positions or policies of Lumina Foundation, the thought leadership panel, or NASFAA.

**About NACAC:** The National Association for College Admission Counseling (NACAC), founded in 1937, is an organization of more than 25,000 professionals from around the world dedicated to serving students as they make choices about pursuing postsecondary education. NACAC's mission is to empower college admission counseling professionals through education, advocacy, and community.

**About NASFAA:** The National Association of Student Financial Aid Administrators is a nonprofit membership organization representing more than 32,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every 10 undergraduates in the United States. Based in Washington, DC, NASFAA is the only national association with a primary focus on student aid legislation, regulatory analysis, and training for financial aid administrators.

### **About Lumina Foundation**

Lumina Foundation is an independent, private foundation in Indianapolis that is committed to making opportunities for learning beyond high school available to all. Lumina envisions a system that is easy to navigate, delivers fair results, and meets the nation's need for talent through a broad range of credentials.

### **Research Support**

This report is based on research funded by Lumina Foundation. The findings and conclusions contained within are those of the authors and do not necessarily reflect positions or policies of Lumina Foundation.

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# Executive Summary

In 2020, American society encountered a flashpoint. Racism, both individual and systemic, was laid bare by an environment in which racist attitudes and beliefs became prevalent, by violence against Black Americans, and by the COVID-19 pandemic. These seismic events exacerbated the enduring effects of systemic racism in all areas of life, from health care to housing to employment to education.

College admission and financial aid officers—and indeed all higher education professionals committed to equity, fairness, and inclusion—believe this is a time when it is incumbent upon all of us, as individuals and as professionals, to question the assumptions about our work, having witnessed the insidious effects of racism in all of society’s systems. The effects of racism extend into postsecondary education, as we have known for decades thanks to the tireless efforts of researchers, advocates, practitioners, and, most importantly, students. The effects of systemic racism touch every element of college admission—a process that, at its origin, was not fundamentally *designed* to promote equity.

In this report, admission recommendations focus on Black students first and foremost, and financial aid recommendations focus on all underserved populations more broadly. To be sure, racism casts destructive effects on many populations in American society. This report’s focus on Black students is a direct outgrowth of the need for a

historical reckoning related to the treatment of Black Americans that reached a crescendo in 2020. This exclusive focus is not intended to minimize or diminish the effects of racism on Indigenous peoples, Asian American students, Latinx students, or other marginalized student populations. Rather, we hope that this report opens the door to more honest acknowledgements of the paths that all of these students follow, as well as more constructive conversations about how racism taints our efforts to build a more just society.

To embark on this critical journey of self-examination, the National Association for College Admission Counseling (NACAC), in partnership with the National Association of Student Financial Aid Administrators (NASFAA), collaborated on this Lumina-funded project. We considered entry challenges to postsecondary education for traditional-aged and adult students of color and develop a framework that uses racial equity as the primary objective for college enrollment, mapping out practical outcomes for institutions as well as policy directions for institutional, state, and federal policymakers. Our collaboration involved:

- Convening of a thought leadership panel,
- Conducting interviews with panel members and students, and
- Hosting a one-day virtual workshop of the thought leadership panel.

The results of these efforts were reviewed and synthesized into the recommendations presented in this paper. Our intent in providing these recommendations is to create a foundation of broad-based questions that can be expanded and explored in light of the vast diversity of postsecondary institutions in the United States. The probing questions raised by these recommendations should be explored both in the aggregate and in the individual institutional context. Our intent is not to dictate specific practices, but to provide a framework so that both current and future practices may be evaluated and considered against a backdrop of comprehensive, inclusive thought.

As a result of this work the following recommendations are put forth:

## Institutional Selectivity

**Key Design Observation:** Selectivity exerts a fundamentally inequitable influence on the path to postsecondary education. It does so not because the system is designed on a complete definition of “merit,” which remains elusive and ill-defined, but because in many cases it is designed to exclude even highly qualified students and because its current configuration relies upon an inequitable system of inputs.

**To Improve Design for Equity:** For institutions that choose to exercise a degree of selectivity in their enrollment process, develop methods for entry that are, to the extent possible, least susceptible to the influence of systemic racism.

## Recommendations

- *Admission Office Recommendation:* Rethink the meaning of selectivity in the institutional context.

- *Institutional Recommendation:* Reconcile institutional prestige and equity goals.
- *State/Federal Recommendation:* Rethink the meaning of selectivity in the public context.

## The Application Process

**Key Design Observation:** The more complex the application process, the less equitable it becomes.

**To Improve Design for Equity:** Radically rethink the concept of the college application so that the burden on the student is minimized and the information stored regarding the student’s K-12 experience is maximized through systems that facilitate simplified sharing of information.

## Recommendations

- *Admission Office Recommendations:*
  - Explore alternatives to the current application process to minimize the burden on students.
  - Reduce or eliminate application fees.
- *Institutional Recommendation:* Develop or strengthen professional development opportunities for school counselors and college advisers serving students of color.
- *State/Federal Recommendations:*
  - Investigate the potential for developing a postsecondary application infrastructure.
  - Invest in programs aimed at hiring, training, and equipping school counselors and college advisers for schools serving large numbers of students of color.

## The Federal Financial Aid Application Process

**Key Design Observation:** The more complex the financial aid application, the less equitable it becomes.

**To Improve Design for Equity:** Rethink the financial aid application process into one that is less burdensome for students and families, and no longer requires them to continue to “prove they are poor.”

### Recommendations

- *Financial Aid Office Recommendations:*
  - Add FAFSA availability to financial aid materials.
  - Make financial aid offers available as quickly as possible.
- *Federal Recommendations:*
  - Prohibit unwarranted use of student and parent FAFSA data.
  - Codify the Oct. 1 release of the FAFSA.
  - Extend the 2021–22 verification waiver.
  - Collect data following expiration of the verification waiver.

## How We Make Admission Decisions

**Key Design Observation:** A student’s body of work in K-12 education should be the nearly exclusive focus when taking the next step to postsecondary education. Each additional requirement beyond a student’s work in secondary school acts as a toll, which exerts a negative effect on equity.

**To Improve Design for Equity:** Radically rethink the criteria upon which we make admission and financial aid decisions to minimize the steps students need to take outside of their K-12 experience.

### Recommendations

- *Admission Office Recommendation:* Re-center the process of evaluating students to focus on a recognition of the array of strengths, skills, and abilities students demonstrate during the K-12 educational experience.
- *Institutional Recommendation:* Allocate greater care, attention, and resources to the application review process to provide more time/space for the institution to review applications for admission in a more contextual fashion.
- *State/Federal Recommendation:* Consider state policies that afford institutions the opportunity to maximize the focus on K-12 experiences and minimize the focus on external requirements or assessments.

## The Admission Staff

**Key Design Observation:** Students need to see themselves reflected in the face of postsecondary education. The more diversity we can encourage in postsecondary admission offices, the greater our ability to attract and relate to a diverse student population.

**To Improve Design for Equity:** Present an interface with students that will be widely understood and accessible by students from different racial, social, and cultural backgrounds.



## Recommendations

- *Admission Office Recommendations:*
  - Prioritize racial equity in admission staff composition and practice, with an emphasis on data-informed practice.
  - Conduct regular listening sessions with current and prospective Black students to better evaluate and assess admission communications, publications, outreach, and recruitment practices.
- *Institutional Recommendation:* Regularly revisit the institutional commitment to racial equity to ensure that processes, staffing, budgets, and priorities are aligned with equity goals.
- *State/Federal Recommendation:* Support regular research and engagement that solicits information about the Black student experience with college admission.

## Combating Implicit Biases in the Financial Aid Office

**Key Design Observation:** Institutions that do not do proactive work to acknowledge the implicit biases of their processes and employees are fostering inequity.

**To Improve Design for Equity:** Encourage an environment where implicit biases are explored and acknowledged in order to combat behavior and practices that have perpetuated systemic racism.

## Recommendations

- *Financial Aid Office Recommendations:*
  - Develop priority deadlines for aid or work opportunities.
  - Review internal policies for institutionally selected verification.
- *Institutional Recommendation:* Ensure fairness and equity for institutional aid or scholarships.

Encourage an environment where implicit biases are explored and acknowledged in order to combat behavior and practices that have perpetuated systemic racism.

# Methodology

**Thought Leadership Panel:** Since many major challenges and barriers to admission and financial aid are already well-researched and documented, we focused on listening to students and practitioners, which we then mapped with what we already know to be true in the established body of research surrounding access issues. This ensures that the recommendations are both data-supported, as well as central to the actual experiences of students, practitioners, and others in higher education. To do this, NACAC and NASFAA worked together to brainstorm a list of practitioners, scholars, and other professionals. After deliberation between the two associations, NACAC formed a thought leadership panel, convening more than 20 admission, financial aid, and other higher education professionals. These professionals provided industry-specific insights, critiques, and recommendations for reducing and eliminating race-based barriers to admission and financial aid. Panelists were asked to participate in this work through two distinct avenues: focus group sessions and a “flare and focus session,” both facilitated by Hearken Consulting.

**Hearken Consulting Work:** To inform this work, NACAC hired Hearken. Hearken is a design consultancy that recommends a human-centered approach to design, test, and implement new strategies and workflows that put those who we serve at the front and center of organizational transformation—in this case, the students at the

heart of the educational endeavor. For this project, we focused on the importance of listening to the lived experiences of students, practitioners, and others who work in higher education—experiences that informed the recommendations included in this report. By approaching the challenge this way we ensured that those most central and most affected by these recommendations are at the heart of the solutions, facilitating a process that allows students, practitioners, and others in higher education closest to the issue to have a more heavily weighted influence in how these challenges are addressed.

Those who suffer most from systemic racism in the context of the transition to postsecondary education are the students.

We adopted this approach for several reasons:

- Those who suffer most from systemic racism in the context of the transition to postsecondary education are the students. Given that admission and financial aid processes are the paths students follow to enter postsecondary education, our goal was to examine that pathway and understand the student experience in combination with our professional experience and expertise.

- There is an abundance of research that demonstrates the sustained effects of systemic racism in our entire educational system, including the transition to and through postsecondary education. While more research can and should be done, there remain few elements of the admission and financial aid processes that have gone unexamined by the critical eye of objective research. Throughout this report, we will refer to such research where it aligns closely with our process and recommendations, though we cannot capture the full depth and breadth of the decades of work of committed researchers and advocates. This report is therefore not intended as a comprehensive overview or summary of all research that has contributed, and will continue to contribute, to our understanding of systemic racism.
- For this project, we wanted to gather input and encourage thinking that was unbounded from the limitations of the current system, while simultaneously recognizing how the current system affects students of color. As such, the recommendations included in this report encourage us to think about what a system that is designed for racial equity could look like. If we set markers for a more equitable future, the possibility of designing systems that steer us toward that future may become more attainable.
- Finally, it is important to note that the recommendations that accompany this report do not necessarily reflect unanimous consensus of the thought leadership panel. Unlike many projects that involve a guiding committee or task force, we did not want this project to shrink the universe of what is possible to only those items on which there was uniform agreement. Rather, the viewpoints

of the thought leadership panel, along with those of the students, informed the report's recommendations. The recommendations expressed by NACAC in the area of admission, and NASFAA in the area of financial aid, are intended to prompt further discussion rather than serve as prescriptive directives.

Hearken's efforts focused on three areas:

- Conducting small group sessions with panel members and student interviews,
- Conducting one virtual meeting of the full thought leadership panel, and
- Conducting two executive whiteboarding sessions with NACAC and NASFAA staff.

#### **Thought Leadership Panel Listening Sessions:**

Hearken Consulting conducted virtual small group listening sessions with all thought leadership panelists in June and July 2021. During these listening sessions Hearken prompted panelists to provide structured feedback to a series of prompts about the admission and financial aid processes from the perspective of students of color. Listening sessions were then synthesized and shared with NACAC and NASFAA.

**Student Interviews:** Hearken Consulting conducted interviews with 17 students of traditional college-age and adult learners in May 2021. Students were recruited by the NACAC, NASFAA, and members of the thought leadership panel. These participants were indispensable in highlighting the real-life hurdles they faced in their college-going process—most of which aligned with research already conducted. Despite the modest size of our panels, consistent patterns emerged as they discussed their experiences and challenges in our system of admission and financial aid.



### Full Thought Leadership Panel “Flare and Focus”

**Meeting:** This convening, in June 2021, was facilitated by Hearken Consulting and brought together thought leadership panelists. Panelists were led through a presentation by Hearken on the findings from listening sessions and interviews and then broken up into groups to discuss ideas for either admission or financial aid. These two smaller groups were facilitated by Hearken and also included NACAC and NASFAA staff.

Specific outcomes from the thought leadership panel listening sessions, student interviews, and full thought leadership panel “flare and focus” meeting are not shared in this report but folded into the recommendation sections outlined later.

**Executive Whiteboarding Sessions:** Two executive whiteboarding sessions were conducted by Hearken to inform this project. The first, in April 2021, was composed of staff from NACAC and NASFAA. The goal of this session was to discuss the overall project and prepare for the work. The second was in June 2021 and was again composed of NACAC and NASFAA staff. The goal of this session was to discuss the aggregated outcomes from all research efforts and begin an initial conversation on recommendations.

After Hearken concluded its work, both NACAC and NASFAA authored the admission and financial aid sections, respectively. The full set of recommendations was presented to the thought leadership panel in October 2021 for feedback before being moved to finalization and publication by NACAC.

## Challenges and Considerations

One important observation from this process was that a significant challenge to making substantial, sustained advances toward racial equity for admission and financial aid leaders was the difficulty in “getting on the balcony,” or gaining an elevated perspective to see the larger picture and avoid the traps of groupthink, inertia, and the grind of everyday work.<sup>1</sup> As one thought leader participant put it:

*“I run into this seemingly every day—the question of budget and resources. We don’t have enough time to do this, or we don’t have enough staff to do it that way. And it really raises the fundamental question: Where are your priorities? It’s both the time and money. The question of the competing other priorities and how this gets understood, I would argue, as legitimately mission-central, embedded part and parcel of the institution...I think it’s actually a question of psychology and approach that’s overlaying in the ether about the approach, intentionality, and transparency associated with these issues.”*

– Thought leadership panel participant

This participant highlighted that a common challenge in rethinking the design of a system is the tendency to assume that the system’s current design is fixed or a “given.” That tendency was underscored in this grant process as discussions often turned to how we can better adapt students to the system, rather than better adapting the system to students. As a core component of the design approach, a culture of continuous learning is a critical element of any transformation process. To be successful, strategies for change need to be sustained by a set of initiatives to fast-track transformation and sustain long-term behavior-change across an organization or profession.

<sup>1</sup> Heifetz, Ronald A., and Linsky, Marty. “Get on the Balcony. (Why Leaders Need to Step Back to Get Perspective),” Harvard Business Review Press, 2002. <https://www.hbsp.harvard.edu/product/1667BC-PDF-ENG>

Finally, this project underscored the importance of *listening*. The national political and social environment in which this discussion took place is defined by an imbalance in our tendency to talk, or shout, rather than to listen. What is clear is that not enough people are listening. The ability of higher education to achieve equity will therefore depend, in part, on our ability to listen to the people who we are trying to serve and on whose behalf we seek a greater accountability for breaking through calcified policies, practices, attitudes, and perceptions.

## Terminology and Scope

In this report, admission recommendations focus on Black students first and foremost, and financial aid recommendations focus on all underserved populations more broadly. To be sure, racism casts destructive effects on many populations in American society. This report's focus on Black students is a direct outgrowth of the need for a historical reckoning related to the treatment of Black Americans that reached a crescendo in 2020. This exclusive focus is not intended to minimize or diminish the effects of racism on Indigenous peoples, Asian American students, Latinx students, or other marginalized student populations. Rather, we hope that this report opens the door to more honest acknowledgements of the paths that all of these students follow, as well as more constructive conversations about how racism taints our efforts to build a more just society.

This is an issue that admission offices have grappled with for many years, though the language sometimes becomes blurred when referring to under-represented students, students of color, and students who are first in their families to go to college. The admission recommendations and considerations in this report specifically focus on considering the harmful effects of racism on Black students in the context of the US postsecondary education system. There are other issues and groups that are deserving of study whose barriers parallel those of Black students, so there are portions of this paper where their challenges are also represented.

One cannot paint all Black students, or to a larger extent, students of color, with the same brush. Differences in personality, skills, interests, traits, etc. are as numerous within racial/ethnic populations as they are in the population at large. In this project, following larger societal trends, there are commonalities between, for instance, low-income students, students who are the first in their families to attend college, and Black students. But we wish to make clear that this project was designed specifically to address race and racism without regard to a student's socioeconomic background. One of our thought leadership panelists reminded us:

*“Not all students of color are poor. Not all students of color are low-resourced.”*

– Thought leadership panel participant

**One cannot paint all Black students, or to a larger extent, students of color, with the same brush.**

Unfortunately, the hurdles for Black and underrepresented student populations don't end after gaining admission to an institution. Once the stress surrounding admission ends, for many, the stress around financing begins. While there have been great strides over the past several decades in providing access to an affordable college education, we know that disparities still exist between who is able to navigate the financial aid process. Of particular concern found across the entire college-going lifecycle is the disparity that exists by race, which is the focus of this report.

The report that follows outlines how the system of selective postsecondary admission contains design elements that were originally intended to exclude, rather than include, many people, including non-white students. Although significant efforts have been made to eliminate overtly racist elements, the legacy that remains in its place continues to bear the effects of exclusion. NACAC and NASFAA, together with the project's thought leadership panel and the students involved, hope to stimulate further, careful consideration of how changing these design elements could lead to improvements in racial equity in college access.





# Introduction and Context

## Original Design Flaws: A History of Inequity

*“If you are making policies that take care of the most vulnerable populations, the non-vulnerable population loses nothing, and it becomes better for everyone.”*

– Thought leadership panel participant

As a precursor to addressing how systemic racism affects the transition to postsecondary education, it is worth a brief review of broad structural challenges that inhibit equity in many forms. There are as many pathways to and through higher education as there are students. The increase in enrollment has transformed college admission into a mass market. The imperative of enrolling a sufficient number of students to meet bottom-line considerations generates billions of dollars in tuition and revenue for colleges and universities, much of that flowing through public and private student loan providers due to a shift in public policy toward higher education as a private good.<sup>2</sup>

Higher education flourishes because the value of a postsecondary degree remains high. The payoff includes higher earnings, greater efficacy in political and personal life, greater satisfaction with life, and a host of other benefits. And society benefits from citizens with advanced education—more skills, greater political engagement, better earnings (and therefore taxes), improved self-sufficiency, less imprisonment, and a reduced need for some social safety net programs.<sup>3</sup>

Yet while many Americans view higher education as a means for upward mobility, America’s public policy has not corrected for calcified social stratification and has increasingly treated postsecondary education as a private good. Moreover, the reduced state/federal role in funding higher education and corresponding reliance on tuition revenue by publicly assisted institutions places additional demands on many colleges’ ability to support students with financial assistance.<sup>4</sup> In a system that is increasingly reliant on private wealth for access and for institutional survival, students who have the fewest resources to contribute are most at risk of being excluded.

<sup>2</sup> Excerpted from the National Association for College Admission Counseling Ad Hoc Committee on Leadership in College Admission “Process, Findings, and Recommendations 2020”

<sup>3</sup> College Board, Trends in Higher Education Series: “Education Pays,” December 2019. <https://research.collegeboard.org/trends/education-pays>

<sup>4</sup> “Funding Down, Tuition Up,” Center on Budget and Policy Priorities, August 2016. <https://www.cbpp.org/research/state-budget-and-tax/funding-down-tuition-up>

While not all students of color lack financial resources, centuries of exploitation and discrimination have left a disproportionate number of Black Americans at or near the poverty line.<sup>5</sup> In addition, the legacy of discrimination against Black Americans continues to cast a wide shadow over all of society, including higher education. According to the American Council on Education, gains in equity over time “are too often overshadowed by outcomes that reflect the effects of systemic and structural barriers that can limit or eliminate opportunity for Black students, families, and communities, as well as for our nation at large.”<sup>6</sup> Likewise, among adults, “African-Americans and Hispanics are less likely to say they have pursued personal learning activities in the prior year by margins that differ significantly from white adults,”<sup>7</sup> according to data from the Pew Research Center.

The US Department of Education reported that the college enrollment rate for Black students who recently graduated from high school actually declined over the past decade.

In 2019, the immediate college enrollment rate for Asian students (82 percent) was higher than the rates for White (69 percent), Hispanic (64 percent), and Black (57 percent) students, and the rate for White students was also higher than the rate for Black students. For White, Asian, and Hispanic students, the immediate college

enrollment rates were not measurably different between 2019 and 2010. **However, for Black students, the immediate college enrollment rate was lower in 2019 (57 percent) than in 2010 (66 percent).** In 2019, the immediate college enrollment rate for White students was higher than the rate for Black students in every year since 2011.<sup>8</sup>

While this trend reflects deep inequities at all levels of society, those committed to postsecondary education have consistently attempted to study and reflect on how it can be better. This was the case, for instance, in the period after World War II when higher education expanded exponentially to serve students from many more socioeconomic backgrounds. It was also the case after the civil rights movement, a time period that saw improved access for women and students from racial and ethnic minority backgrounds. A similar impetus to surmount the persistent legacy of racial inequity propels us today.

Although the ways in which students are excluded from postsecondary education are numerous, the primary point of interest to this project are those barriers that make it difficult for students to gain entry to a college or university in the first place. Barriers to entry constitute a critical first hurdle that many students must clear to have any chance of success.

<sup>5</sup> “Inequalities Persist Despite Decline in Poverty For All Major Race and Hispanic Origin Groups,” United States Census Bureau, September 20, 2020. <https://www.census.gov/library/stories/2020/09/poverty-rates-for-blacks-and-hispanics-reached-historic-lows-in-2019.html>

<sup>6</sup> “Race and Ethnicity in Higher Education,” American Council on Education, 2019. <https://www.equityinhighered.org/resources/report-downloads/>

<sup>7</sup> Pew Research Center, “Lifelong Learning and Technology,” March 22, 2016. <https://www.pewresearch.org/internet/2016/03/22/in-addition-to-socio-economic-class-there-are-differences-in-adult-learning-with-respect-to-race-and-ethnicity/>

<sup>8</sup> US Department of Education, Condition of Education, 2020. See <https://nces.ed.gov/programs/coe/indicator/cpa>

With this context as a starting point, the goal of this project was to envision how admission and financial aid systems should be designed if racial equity was the primary objective. We did so to begin a much broader and more sustained conversation, knowing that many thousands of perspectives will be needed to address systemic racism and that there are macro-issues that are far outside of our control and that require other actors from many different sectors to solve.

## A Note About Public Investment in Postsecondary Education

The ability of admission and financial aid offices to single-handedly effect change is circumscribed by institutional, state, and federal policies that often render strategies aimed at improving equity impossible for financial reasons.

State policymakers often rationalize funding cuts to public research universities based on the assumption that these universities can generate their own revenues through tuition. Our research finds that while most public research universities do successfully grow tuition revenue to compensate for state budget cuts, forcing universities to finance their survival through tuition revenue compels them to prioritize customers who pay the most. As a result, public flagship universities may expend substantial resources recruiting and offering “merit” aid to mediocre out-of-state students who are rejected from public universities in their own state, while high-achieving, low-income in-state students are neglected and often funneled to community

colleges that dramatically reduce their chances of ultimately obtaining a bachelor’s degree. This is not a meritocracy. Nor is it an evil plot by universities. It is a rational response to incentives created by government disinvestment in public higher education. Policymakers at both the federal and state levels should give consideration to how they can apply policy levers to provide sustainable financial pathways that enable public research universities to flourish by serving the mission of social mobility that they were founded to serve.<sup>9</sup>

Admission officials frequently must grapple with conversations with institutional administrators that involve statements such as, “How do we fund our ambitious plans?” and “We can’t cut into the full-paying students.” In such environments, we are mindful that simply addressing admission and financial aid practices in isolation will be largely ineffective, as the locus of control over policies and institutional priorities that drive such disparities are often far beyond the reach of practitioners. As such, this report will provide recommendations that should be considered together as a comprehensive means for untangling the complex web of policies that result in sustained racial inequity in postsecondary education.

## Our Responsibility

It is important to note that this project and this report contain painful, difficult acknowledgements of the limitations of the system in which admission and financial aid professionals work. The struggle to achieve a more equitable future even within these parameters is evident, as college admission

<sup>9</sup> Jaquette, Ozan and Han, Crystal. “Follow the Money: Recruiting and Enrollment Priorities of Public Research Universities.” Third Way, 2020. <https://www.thirdway.org/report/follow-the-money-recruiting-and-the-enrollment-priorities-of-public-research-universities>



and financial aid professionals strain to implement practices that are, for many reasons, constrained from succeeding. While this report will prompt difficult questions, it is important to acknowledge the commitment that NACAC, NASFAA, and our members have to improving equity in higher education—a commitment that has lasted for decades and will continue for many more.

Acknowledging the deep roots of these systems, as well as the ground in which the roots are planted, was essential in envisioning design principles oriented toward racial equity. College admission and financial aid processes have undergone multiple iterative changes, including many aimed at improving equity outcomes. Yet underlying constructs, including application processes, selective admission practices, financial aid rules, and procedures—plus the criteria by which institutions evaluate students—continue to constrain our ability to effect change.

- **Process Challenges:** For many students, the prospect of applying to college can be intimidating, and many students of color lack

access to resources or individuals, such as school counselors, who can assist them in the complicated tasks involved in the application process. School counselors and college advisers can make a substantial difference. Lack of access to school counselors is a civil rights challenge,<sup>10</sup> in part because many students lack access to college guidance.<sup>11</sup> Adult learners—both first-time and those with some postsecondary coursework—have access to significantly less postsecondary guidance.<sup>12</sup> In addition, unscrupulous institutions have preyed on adult learners for their financial aid eligibility, leaving them with unmanageable debt.<sup>13</sup> Such institutions disproportionately target students of color, further exacerbating racial inequities in educational attainment and student debt.<sup>14</sup>

- **Complexity:** Our admission and financial aid processes are complex, cumbersome, and bureaucratic. Research shows that many students don't complete the process due to its navigational difficulty.<sup>15</sup> In addition, adult students often find it very difficult to make

<sup>10</sup> <https://www2.ed.gov/about/offices/list/ocr/docs/CRDC2013-14-first-look.pdf>

<sup>11</sup> “Student-to-Counselor Ratios by School District,” National Association for College Admission Counseling, 2019. <https://www.nacacnet.org/news--publications/Research/student-to-counselor-ratios-by-school-district/>

<sup>12</sup> For example, see WICHE, “Bringing Adults Back to College: Designing and Implementing a Statewide Concierge Model,” <https://www.wiche.edu/blog/resources/bringing-adults-back-to-college-designing-and-implementing-a-statewide-concierge-model/>; and “Colleges Should Cultivate More Equitable Transfer Pathways,” <https://www.insidehighered.com/views/2020/04/23/colleges-should-do-more-create-equitable-transfer-opportunities-students-opinion>

<sup>13</sup> “How For-Profit Colleges Sell ‘Risky Education’ To The Most Vulnerable,” National Public Radio, March 27, 2017. <https://www.npr.org/2017/03/27/521371034/how-for-profit-colleges-sell-risky-education-to-the-most-vulnerable>.

<sup>14</sup> “Worse Off Than When They Enrolled: The Consequence of For-Profit Colleges for People of Color,” The Aspen Institute, March 19, 2019. <https://bit.ly/3k3gb4H>

<sup>15</sup> “Complexity in College Admission: The Barriers Between Aspiration and Enrollment for Lower-Income Students,” College Board, October 2011. <https://secure-media.collegeboard.org/digitalServices/pdf/advocacy/admissions21century/complexity-in-college-admission.pdf>

the transition into postsecondary education, whether for the first time or as a returning student.<sup>16</sup> Removing unnecessary barriers will require a fundamental reimagining of the entire college application process.

- **Entry Criteria:** A great deal of inequity results from the access advantaged students have to the resources needed to augment their secondary school record, including (but not limited to) multiple standardized test sittings, test preparation activities, essay assistance, and private college counseling. Black students, on the whole, have less access to college preparatory coursework and fewer school counselors, as well as fewer financial resources to take or retake admission tests, thereby lacking access to the very levers students must pull to enter selective postsecondary education.

- **Financial Constraints:** State and federal financial aid are insufficient to cover the cost of attending most colleges and universities, constituting a significant and systemic barrier to many students.<sup>17</sup> Adding to this considerable affordability barrier is the requirement that students prove they are in need through the complicated process of completing a FAFSA and, in some cases, a CSS Profile or other institutional application requirement.

A mindset that consistently challenges assumptions is critical to the work of improving equity in postsecondary educational access. The following sections of this report examine elements of the admission and financial aid processes where professionals, institutional leaders, and policymakers can explore ways to center equity in the practices and policies involved in recruiting and enrolling students in postsecondary institutions.

<sup>16</sup> “Going Back to College as an Adult? Here’s What You Need to Know” MarketWatch, February 1, 2019.  
<https://www.marketwatch.com/story/going-back-to-school-as-an-adult-heres-what-to-know-2019-01-31>

<sup>17</sup> See <https://research.collegeboard.org/pdf/trends-college-pricing-student-aid-2020.pdf>

# Institutional Selectivity

## Reconciling Exclusivity with Equity



### Key Design Observation

Selectivity exerts a fundamentally inequitable influence on the path to postsecondary education. It does so not because the system is designed on a complete definition of “merit,” which remains elusive and ill-defined, but because in many cases it is designed to exclude even highly qualified students and because its continued design relies upon an inequitable system of inputs.

*“[T]he race for numbers is over, and...the race for quality has begun. A few years ago our colleges and universities were competing for students, and great emphasis was laid upon ‘healthy growth.’ Now we are beginning to limit our numbers, to compete only for the best students, and to point with pride to the multitude we turn away.”*

– Frank Aydelotte, president,  
Swarthmore College (PA), 1928<sup>18</sup>

### To Improve Design for Equity

For institutions that choose to exercise a degree of selectivity in their enrollment process, develop methods for entry that are, to the extent possible, least susceptible to the influence of systemic racism.

<sup>18</sup> Wechsler, Harold S. *The Qualified Student: A History of Selective College Admission in America*. Transaction Publishers, New Brunswick, NJ. 2014. p. 230.

The “Reputational Model” of higher education is based on a fundamental preoccupation with exclusivity. The roots of selective college admission are deep and extend to the very origins of the modern institution. For many institutions that were transforming in the early 20th century, “[s]elective admissions would present the discovery of the best material from among all applicants and the University would prepare them for positions of responsibility.”<sup>19</sup> This viewpoint was rooted in a time when eugenics and racism were openly accepted as facts of life. Since that time, our understanding of human abilities, social influences—most importantly for this project: racism, systemic inequities, and education—has progressed to a point where these old assumptions about “the best material” no longer apply.

*“If you’re stepping back and saying where is the search process beginning, I don’t know if it’s going to be successful just to eliminate all the barriers that are there, because I think the barriers, for a lot of colleges, are purposeful, and they put them up as a way to connote value—that they are being selective, that they are creating this microcosm of an environment.”*

– Thought leadership panel participant

Put bluntly, institutions make a choice to be exclusive. The choice to be exclusive, by definition, and, as the quote from former university president Frank Aydelotte above illustrates, places institutions in a position where it is much more difficult to be inclusive due to the “multitudes that [they] turn away.” As such, while highly selective institutions have expressed an admirable commitment to racial equity—indeed, many have endured protracted

legal battles culminating with Supreme Court cases—they do so in a system that is, at best, only minimally designed to facilitate equity. Many of the processes and criteria associated with highly selective admission are designed to exclude, not include. The central challenge, as pondered by both students and the thought leadership panel, is that since the fundamental inputs associated with selective admission are themselves tainted by racial inequity, making high-stakes decisions based on these flawed criteria results in fundamentally inequitable outcomes.

*“How do you determine who has merit and potential when you’re admitting [students] to college, when people have not had equal opportunities to demonstrate merit?”*

– Thought leadership panel participant

As this project has illuminated, adding variables outside of the context of the high school experience creates “tolls” on the road to college, each of which has a regressive influence on equity. NACAC’s research on the factors in the admission decision confirms through correlation analysis that the more selective the college, the more weight is placed on added variables, which are not equally attainable by all.<sup>20</sup> By adhering to a selective process that favors variables only some students can attain, these highly selective institutions validate an admission model that is designed to admit students who are able to access these extracurricular variables and exclude those who can’t. Regardless of intention, the design of this type of system prioritizes students with access over those without.

<sup>19</sup> Ibid., p. 233.

<sup>20</sup> Clinedinst, M, and Hair, C. *State of College Admission*, National Association for College Admission Counseling, 2019. [https://www.nacacnet.org/globalassets/documents/publications/research/2019\\_soca/soca2019\\_ch3.pdf](https://www.nacacnet.org/globalassets/documents/publications/research/2019_soca/soca2019_ch3.pdf)



Admission offices balance a juggling act of institutional interests as they attempt to meet the institution's tuition needs, achieve a mix of students from varying walks of life, and recruit students who will enable the institution to sustain academic departments as well as quasi-extracurricular and extracurricular activities. This model is reinforced by legal considerations as well, including in-state recruitment mandates for public colleges, Title IX considerations for sports teams, and federal and state legal considerations for ensuring that institutions do not violate civil rights laws. With that said, there have been many proposals over the years calling for a more randomized approach to higher education admission.<sup>21</sup> Public K-12 schools where attendance is not defined by neighborhood frequently employ randomized admission to ensure equity. Some states allow “weighted” lotteries to ensure that underserved students have access to resources that have been specially designed to serve them.<sup>22</sup>

While selective institutions began their current trajectory in the 1920s, others took a more democratic approach. The president of the University of Wisconsin, Alexander Meiklejohn, noted in 1927 that the university's primary task was “taking all types of young people and discovering their talents,” an important acknowledgement that talents are manifold and up to postsecondary institutions to discover.<sup>23</sup> The thought leadership panel noted that a large majority of four-year colleges in the United States accept more than half of all applicants, and a substantial portion of that majority accept nearly all

students who apply. Indeed, the average acceptance rate for selective colleges (the population of four-year colleges minus open-enrollment institutions) has hovered around 65 percent for the last two decades.<sup>24</sup> As a result, both students and thought leaders questioned whether our current terminology about entrance to college, much of which is modeled on the elitist model developed in the early 1900s, is well-suited to equity.

*“It starts by saying we have got to get rid of the word ‘admissions’ and the whole idea of being selective. We know that most colleges are not highly selective.”*

– Thought leadership panel participant

That said, roughly half of all colleges turn away a third or more of their applicants, which means that there must always be a focus on whether those being excluded are disproportionately students of color. In addition, the most highly selective colleges exercise outsized influence on policy, practice, and the national conversation about college admission. Media attention is weighted heavily toward highly selective colleges, selective colleges are the subject of regular lawsuits over admission policies, and admission policies at highly selective colleges have long-served as the model for other institutions. Indeed, the popular perception of college admission still remains wedded to the idea that entrance to postsecondary education is an exclusive endeavor.

Importantly, rankings of colleges and universities was a topic close to a number of people's minds in the thought leadership panel. Although rankings

<sup>21</sup> See Poon, OiYan, “Dismantling the Hunger Games: Exploring a Match System in Selective Admissions,” Hack the Gates Initiative, August 2020. <https://hackthegates.org/wp-content/uploads/2020/08/Poon-Match-HTGReport.pdf>

<sup>22</sup> See “State Laws on Weighted Lotteries and Enrollment Policies,” National Alliance for Public Charter Schools, 2015. [http://www.publiccharters.org/sites/default/files/migrated/wp-content/uploads/2015/06/NPC035\\_WeightedLotteries\\_Digital\\_rev.pdf](http://www.publiccharters.org/sites/default/files/migrated/wp-content/uploads/2015/06/NPC035_WeightedLotteries_Digital_rev.pdf)

<sup>23</sup> Wechsler, p. 230

<sup>24</sup> National Association for College Admission Counseling, State of College Admission, 2005–2019.

publications can provide some helpful reference information, their primary influences end up (1) preserving the status quo, which is heavily dependent upon the exclusivity of the institution, and (2) providing a highly visible incentive for institutions to adhere to the status quo or be penalized. Recent proposals to rethink rankings to emphasize equity are important to pursue,<sup>25</sup> though the ultimate responsibility will rest with institutions to understand how their acceptance rates can act as a deterrent to equity.

The question about exclusivity in admission is indeed a formidable one. The right of an institution to admit who it wants and by which standards is a long-held legal principle that has often been used to defend efforts to recruit a diverse student body. But in accordance with the scope of this project, if racial equity is our primary goal, then even the cherished mantle of “selective” admission must be on the table.

*“Either you redesign the whole institution around equity, or you don’t. That’s big. But now is the moment that enough institutions are actually saying, ‘you know, we might actually...be racist.’ That just wasn’t happening a couple of years ago.”*

– Thought leadership panel participant

Given the entrenched nature of systemic racism, institutions wishing to reexamine their policies and practices through a racial equity lens should begin with why they decide to exclude students. The reasons may be many, varied, and ultimately justifiable, whether based on the knowledge needed to succeed or limitations on the ability to serve more than a set number of students. At this high

level, institutional awareness of who is likely to be excluded is essential to an understanding of racial inequity. Institutions must then examine the grounds upon which the institution makes decisions to exclude. At this level, systemic elements discussed in this report, as well as other aspects of admission decisions that tend to perpetuate privilege and racial inequity, will require institutions to ascertain whether their hand-selection of classes beyond a certain eligibility threshold results in equitable outcomes. Conversely, could another system that is less subject to bias, particularly racial and ethnic bias, serve their racial equity ends more optimally?

If all qualified students had an equal chance of being admitted—however low—the correlation between selectivity and inequity would be significantly reduced (though not eliminated, given systemic challenges). But based on the current design of selective admission processes, institutions that decide to exclude large numbers of students will inevitably face serious challenges in achieving racial equity.

## Recommendations:

### Admission office:

- **Rethink the meaning of selectivity in the institutional context.** Examine whether the purposes of selective admission policies can be equally well-served by methods of student selection that minimize the ways in which racial bias enters the process of selecting qualified students for enrollment. For institutions without selective admission policies or with substantially open admission policies, explore new ways to characterize the application process to provide greater clarity as to students’ prospects for enrollment.

<sup>25</sup> See Ngo, Frederick, “The Equity Rankings: An Alternative Assessment of U.S. Higher Education,” Hack the Gates Initiative, August 2020. [https://hackthegates.org/wp-content/uploads/2020/08/Ngo-EquityRankings\\_HTGreport3.pdf](https://hackthegates.org/wp-content/uploads/2020/08/Ngo-EquityRankings_HTGreport3.pdf)

*Institutional:*

- **Reconcile institutional prestige and equity goals.** For selective institutions, examine whether the institution's acceptance rate is grounded in defensible educational values and whether it is aligned with mission-grounded efforts to achieve racial equity.

*State/Federal:*

- **Rethink the meaning of selectivity in the public context.** Question whether public institutions should be selective, and on what basis, to minimize the ways in which racial bias enters the process of selecting qualified students for enrollment. For public institutions that are equipped to serve demand, develop policies that facilitate admission of all in-state students who meet the institution's entry criteria. For institutions requiring mastery of certain subject matter, consider the feasibility of randomized admission for students meeting or exceeding eligibility criteria.



# The Application Process

## A Straight or Winding Road?



### Key Design Observation

The more complex the application process, the less equitable it becomes.

### To Improve Design for Equity

Radically rethink the concept of the college application so that the burden on the student is minimized and the information stored regarding the student's K-12 experience is maximized through systems that facilitate simplified sharing of information.

*“When I put it on a flowchart, it was overwhelming to see the hurdles that we put up for our students that are coming in.”*

– Thought leadership panel participant

*“One of the biggest barriers for me was just accessibility to the application.”*

– Student interviewee

Students and thought leaders alike noted that the process of applying to college compounds inequities by virtue of its complexity. While many students of color successfully navigate the process, the lack of specialized “college knowledge”—knowledge of the processes necessary to apply to postsecondary education—and a lack of access to college guidance resources, constitutes a barrier that disproportionately affects students of color. The historical roots of the application process and its effects on students of color surfaced early in the thought leadership panel’s conversations:



*“[We need to bring a focus to] the underlying inequities that are built into the system itself. This is fundamentally a question of access to information or access to opportunity that go hand in hand. Think about the relative number and percentages of school counselors and underfunded, underserved schools and what that does on the trajectory of a student who... doesn’t know what they don’t know—the opportunity, the investment in things like curriculum, and the rigor of the curriculum, or access to testing; all of those things built in an inherent bias against those students. We’re missing tons of potential because of both the question of awareness and the question of resources designed to help guide, elevate, and support students along the way, which...the nontraditional students, the students of color simply don’t have that access or those resources. [T]he system itself is stacked before the student ever starts.”*

– Thought leadership panel participant

Since we know that the complexity of the application process itself can be a barrier to equity,<sup>26</sup> reexamining the application as a fundamental concept, as well as its component and related elements, is essential to re-envisioning a design centered on equity. This project led us to contemplate the act of applying, the cost of applying, and the assistance available to students for help in applying as key barriers to equity in college access.

## The Act of Applying

The concept of “applying” to college is firmly embedded in a higher education design that, at its origin in the United States, valued exclusivity, rather than inclusivity. In that respect, the application was *designed* as a barrier to entry. While not all postsecondary institutions require an

application beyond obtaining contact information and confirmation of a student’s educational record, nearly all institutions require a student to complete a process derived from the original model. Applications variously require time, money in the form of application fees, generation of original material in the form of essays or personal statements, recommendations, standardized test scores, and other supplemental information.

In most cases, students wishing to attend postsecondary education must coordinate a range of steps outside of the context of the school setting just to access the “on ramp” to college. These steps include, but are not limited to, researching institutions, understanding each institution’s specific application procedures, connecting with admission officers in some cases, and filling out an application for admission along with attendant additional requirements. As students told us during this project, the daunting nature of initiating contact with a college served as a barrier:

*“It felt very...isolating, having to reach out to schools.”*

– Student interviewee

Once students have completed the research into the process of applying, they must allocate time and resources to completing a form to request that they be permitted to study at an institution—time that is multiplied for each institution to which a student desires to submit an application. Students interviewed for this project recognized the significant commitment of time, even within a convenient system such as the Common Application, needed to complete even a single application, much less two, three, or more.

<sup>26</sup> “Complexity in College Admission: The Barriers Between Aspiration and Enrollment for Lower-Income Students,” College Board, October 2011. Available at: <https://secure-media.collegeboard.org/digitalServices/pdf/advocacy/admissions21century/complexity-in-college-admission.pdf>

*“In addition to just the amount of time that it takes to put together a competitive application, I think time is a barrier that a lot of people don’t necessarily think about. It’s just assumed that if you really want to go to a great school...you’re just going to commit that time to applying. Think about students who have part-time jobs, who are raising families, or who are taking care of their families. Time is a really, really big barrier.”*

– Student interviewee

Each component of the application process takes on a life of its own. Each year, the NACAC national conference offers “evergreen” educational sessions on essay writing; letters of recommendation; the relevance of leadership, character, or grit; standardized tests—all of which generate conversations about equity, as we will discuss in the section on factors in the admission process. For the purposes of this project, the need to recognize the application process as an intentional barrier, at least in its origins, became clear in order to appreciate the deep roots that contribute to the perpetual inequities in the system as designed.

## Paying to Apply

A recurring theme among students was the barrier presented by application fees. While organizations like NACAC and institutions themselves make fee waivers available,<sup>27</sup> the added requirement that students prove that they are eligible—as several thought leaders noted, “prove that they are poor”—presents yet another detour on the road to

college that disproportionately affects students of color. Obtaining an application fee waiver often requires students to provide information about their family’s income, along with an attestation by a school counselor or other school official, subject to approval by each admission office to which they would like to apply.

The Education Trust pointed out that \$77—the average application fee for the most highly selective colleges—quickly becomes a barrier for students. One student had to borrow money from a friend to cover the cost of a second application.<sup>28</sup> This financial burden especially affects students of color, as families of color comprise a larger share of low-income families in the US relative to other racial groups.<sup>29</sup> In this context, it is perhaps not surprising that students in this project readily identified the application fee as another significant barrier.

*“And then there’s the entire barrier for both public and private schools—admissions application fees. A lot of times students are paying hundreds of dollars.”*

– Student interviewee

*“[W]hy is it so expensive to pay to apply to college?”*

– Student interviewee

According to the most recent data available, the average application fee among all colleges reporting data to the Department of Education’s Integrated Postsecondary Education Data System (IPEDS) is \$50. Of particular note, however, public institutions (91 percent) were significantly more likely to charge a fee for applying than private institutions (57

<sup>27</sup> NACAC offers an application fee waiver and an enrollment deposit fee waiver for students: <https://www.nacacfairs.org/learn/fee-waiver/>

<sup>28</sup> See: <https://edtrust.org/the-equity-line/how-college-application-fees-are-barriers-to-college-access/>

<sup>29</sup> Center for Budget and Policy Priorities, <https://www.cbpp.org/blog/rising-costs-making-it-hard-for-students-particularly-of-color-to-afford-college>, October 2019.

<sup>30</sup> Clinedinst and Hair, 2019.

percent).<sup>30</sup> For many families, the luxury of sparing \$50—much less \$50 for each additional college—to submit an application quickly adds up and supplants essential needs.

*“If we talked about equity in making college less exclusive and elitist...let’s get rid of fees. And if we’re not getting rid of fees, because it’s a business, make waivers and ways around these [fees] more transparent for students.”*

— Student interviewee

That students of color so readily and consistently identified application fees as a barrier during this project is an indicator to colleges and universities that these fees come with a trade-off—the higher the fee, the less equitable. As such, we must question whether, in an equitable system of postsecondary access, charging students for the act of submitting their official interest in an institution serves a constructive purpose.

## School Counseling and College Advising

Even in a system where the application process is optimally designed for equitable access, the need for assistance is still prevalent. As students approach college-age, access to good college advising becomes crucial. As NACAC research indicates, students who work with a school counselor are nearly seven times as likely to complete the FAFSA, three times as likely to attend some form of postsecondary education, and twice as likely to attend a four-year college.<sup>31</sup>

However, college counseling for high schoolers is not distributed equally, with minority students less likely to know their counselor’s name and to meet with their counselor compared to their white counterparts (Auger et al., 2018). Less privileged schools often have a hard time finding and adequately paying qualified school counselors, and burnout rates for counselors that are hired are high (Fye et al., 2020), making it difficult for students to maintain secure connections with counselors.

In 2016, the US Department of Education cited inequitable access to school counselors as a civil rights issue. About 95 percent of high school students have access to at least one school counselor. But 21 percent of high schools and about 850,000 high school students nationwide do not have access to any school counselor. And 1.6 million students attend a school with a Special Law Enforcement Officer (SLEO), but not a school counselor.<sup>32</sup> Students involved in this project reinforced the department’s finding:

*“It’s not an issue of where these students are underachieving or don’t want to go to college. I just genuinely think they have the potential to and no one is helping them the way that private schools get help.”*

— Student interviewee

In addition to equity in access to counseling and advising, we must solve the long-standing challenge of a lack of adequate training for school counselors and college advisers. Because our postsecondary “system” is not, in fact, consistently

<sup>31</sup> Velez, Erin Dunlop. “How Can High School Counseling Shape Students’ Postsecondary Attendance?” National Association for College Admission Counseling, 2016. Available at: <https://www.nacacnet.org/globalassets/documents/publications/research/bsls-phase-iii.pdf>

<sup>32</sup> “2013-14 Civil Rights Data Collection, A First Look: Key Data Highlights on Equity and Opportunity Gaps in Our Nation’s Public Schools,” US Department of Education, Office for Civil Rights, 2016. <https://ocrdata.ed.gov/assets/downloads/2013-14-first-look.pdf>

designed as a “system,” a systematic approach to training school counselors and college advisers on college admission counseling does not exist. The two major sources of such training are pre-service programs, primarily graduate counselor education curricula, and in-service programs, encompassing everything from school district trainings to statewide trainings to state and national nonprofit trainings. A research study of pre-service graduate courses focused on college admission counseling found that out of 25 such programs, only seven included courses on advising historically under-represented minority students.<sup>33</sup>

The strain on our college advising infrastructure was evident in the comments from students who participated in this project. Their comments bring to life the same issues that surface in the data.

*“My school did have a college counselor, who wasn’t very helpful, and I would say that she wasn’t very informed on current college prospects and financial aid opportunities, but also had a really siloed idea of where students should apply based on her perception of them. She was only familiar with and encouraging students to apply to local city colleges.”*

– Student interviewee

*“I don’t think it was an issue of [the counselors] not wanting to, I just don’t think they knew how to, because I was being asked and told to do things that were just very, very different from the processes that my classmates were going through.”*

– Student interviewee

For adult students, the lack of any form of advising outside of an institutional setting is particularly pronounced. While students in secondary schools can consult with school counselors, college advisers, teachers, administrators, and peers, many adult students find themselves isolated as they pursue information about postsecondary education, a feeling that is compounded by an information environment that can be manipulated by unscrupulous institutions.

*“For students who are of nontraditional age, they don’t have a counseling structure. So who helps them navigate the process? It’s very informal; they go to friends and family who often don’t have the best information. And then, finally, for nontraditional students, let’s say you try college, go away from college, come back to college, that previous experience is always held against you, both from a financial perspective and academic perspective. The barrier of reentry can be very, very high.”*

– Thought leadership panel participant

On top of the existing complexity ingrained in the process, these factors combine to form a significant barrier, which can multiply exponentially for students transferring between schools:

*“[W]ith the transfer lens, it’s the lack of knowledge of the process. Not only do we get a lack of information, but the processes are so individualized to institutions that it’s impossible to navigate because there’s not a lot of consistency.”*

– Thought leadership panel participant

<sup>33</sup> “Building College Access/Admission Counseling Competencies,” The Council of National School Counseling and College Access Organizations,” 2016. <http://schoolcounselingcollegeaccess.org/wp-content/uploads/2016/03/CouncilReport.pdf>



Absent a streamlined system for entry into postsecondary education, the “system,” such as it is, necessitates access to support to navigate the diverse American higher education landscape. However, our means for assisting students is woefully under-resourced and under-staffed. From a design perspective, reconsidering the complexity of the application process alone will not alleviate the burdens associated with inequities in college access. In addition, we must ensure that students of color have equitable access to counseling and college advising.

## Rethinking the Application

Our work with the students and thought leadership panel produced questions about whether the application process as it currently exists is truly necessary. One thing became clear: The current application process evokes anxiety and hardship, particularly for students of color. As one thought leader noted:

*“[A] survey of students who talked about the college application process...said how terrible it was. So clearly it’s not a very student-centric process.”*

– Thought leadership panel participant

If we are to move toward an equity-centered design, we must consider how students—particularly students of color—interface with prospective colleges. The extent to which we can eliminate extraneous steps seems likely to take us in the direction of greater equity in the application process, including the possibility of eliminating the need for the application as we currently know it. Students who took part in this project were very aware of the redundant nature of this process and can clearly envision a future in which information that is readily available drives a process more attuned to students’ needs:

*“Institutions have a lot of data and a lot of information about students. I really think they should be doing more with that information to meet students where they are instead of relying on students who likely don’t know a whole lot about the admissions process and don’t know a lot about the college-going process. Stop relying on those students to reach out and advocate on their own behalf because sometimes they don’t know that’s what they need to do until it’s too late.”*

– Student interviewee

Between state longitudinal data systems, the National Student Clearinghouse, and local or district school records, the potential for building a better application system based on currently existing data has yet to be realized. To reduce the racial equity gap created by complex, numerous, and varied application processes, professionals and students involved in this project envisioned a more student-centric system. In a student-centric system, for example, a student could simply select colleges to which they wish to apply, after which the student’s records would be shared digitally between the sending and receiving institution with little or no additional action required by the student. Such a system seems to create enormous potential for eliminating an important barrier to racial equity, as well as other inequities.

There is evidence that this system is feasible—Idaho took steps to radically redesign application and admission processes at public institutions, resulting in a transformed and substantially more equitable process.<sup>34</sup>

<sup>34</sup> See Delaney, Jennifer A., and Odle, Taylor K., “Reducing Red Tape Through Simplification: How Idaho Radically Reimagined College Admissions,” Hack the Gates Initiative, August 2020. [https://hackthegates.org/wp-content/uploads/2020/08/DelaneyOdle\\_DirectAdmissions\\_HTGreport.pdf](https://hackthegates.org/wp-content/uploads/2020/08/DelaneyOdle_DirectAdmissions_HTGreport.pdf)

*“A lot of the public institutions that I applied to were state institutions, very well talked about in my hometown, at my high school, very easy to log on to their website and find their application because they have an independent application system that is specific to the school, whereas the private institutions that I applied to all were applied through the Common App, which comes with its own qualms.”*

– Student Interviewee

Given the vast improvements in technology, the possibility for a more integrated information pipeline to replace a separate application process is substantially more feasible for both public and private institutions today than it was just a decade ago. Indeed, advances in technology have substantially increased the use of data and digital measures in the recruitment process, allowing colleges to reach far more students than in the past. Accordingly, the prospect of colleges being more proactive in engaging with students was a recurring theme among the thought leadership panel. By moving toward systems that better utilize the data and information already available to invite students to study, colleges can take significant steps toward a more equitable application system.

*“I attended one of these high schools that was extremely under-resourced. And I received a letter from a state university that had taken it upon itself to find students who fit in certain metrics...sent me a letter and said, we’ve provisionally admitted you to our school, if you want to come, by the time you graduate high school you can come. College wasn’t on my radar until that happened. And maybe if we could do more of that, it could make sense.”*

– Thought leadership panel participant

In addition to state systems, private initiatives that address this topic are underway. EAB, a prominent higher education consulting organization, recently announced an initiative with Concourse, a private software company, to partner with more than 100 community organizations in the Chicago area to pilot a system in which students’ records can be collected in a centralized location where colleges can review and submit offers of admission to the student without requiring a formal application.<sup>35</sup>

## Recommendations

### Admission office:

- **Explore alternatives to the current application process to minimize the burden on students.** In partnership with students, K-12 schools, existing application providers, and other stakeholders, take stock of the information needed for the admission application process and the extent to which that information can be automatically transferred once students indicate interest in the institution.
- **Reduce or eliminate application fees.** At a minimum, make application fee waiver forms widely available and visible on institutional websites and explore ways to offer automatic or significantly simpler waivers for students whose existing eligibility for federal aid serves as an indicator of need.

<sup>35</sup> See <https://eab.com/insights/press-release/enrollment/greenlight-match-college-access/>

*Institutional:*

- **Develop or strengthen professional development opportunities for school counselors and college advisers serving students of color.** Colleges and universities can play a significant role in connecting with professionals who serve students of color by providing outreach, professional development, and coursework aimed at strengthening the college admission counseling profession.
- **Invest in programs aimed at hiring, training, and equipping school counselors and college advisers for schools serving large numbers of students of color.** Reducing student-to-counselor ratios and providing the means for one-on-one advising for students of color will result in greater strides toward racial equity in college access.

*State/Federal:*

- **Investigate the potential for developing a postsecondary application infrastructure.** In conjunction with students, institutions, K-12 schools, and existing application providers, support efforts to move toward a system that can facilitate the automated transfer of student records and students' interest in applying to and attending specific institutions.

Colleges and universities can play a significant role in connecting with professionals who serve students of color by providing outreach, professional development, and coursework aimed at strengthening the college admission counseling profession.

# The Federal Financial Aid Application Process

## Hardest for The Poorest?



### Key Design Observation

The more complex the financial aid application, the less equitable it becomes.

### To Improve Design for Equity

Rethink the financial aid application process into one that is less burdensome for students and families, and no longer requires them to continue to “prove they are poor.”

For most students, the financial aid process starts with the Free Application for Federal Student Aid (FAFSA). After submitting their FAFSA, the Department of Education (ED) processes the application and sends the information to the schools the student listed on their FAFSA. A student then learns if they’ve been selected for verification, a process an institution undertakes on behalf of ED to verify the accuracy of the information an applicant has provided on their FAFSA. Institutions will then use the FAFSA data to determine the types and amounts of financial aid the student is eligible to receive.

As currently structured, the financial aid application process, primarily the FAFSA, can contribute to inequities due to its complexity. While many meaningful improvements have been made to the FAFSA over the course of its existence, it remains long, complex, and most daunting for those with the least resources, those for whom this system was created to aid. This complexity often causes students to stop before fully completing an application, or worse yet, deters them from even beginning an application. As one thought leader stated:



*“This process is decades old, and family makeup, our economy, our social structures, our neighborhoods, are drastically different than what they were when these systems and structures were created.”*

– Thought leadership panel participant

It is worth noting that in December 2020, Congress passed the Consolidated Appropriations Act, 2021, a massive package of legislation that averted a government shutdown and funded the federal government for fiscal year 2021. Most notably, for financial aid purposes, included in the omnibus were provisions around FAFSA simplification, which would make significant changes to the need-analysis formula, allow students to preview their eligibility for the Pell Grant award, and expand Pell Grant eligibility to incarcerated students. While many of these changes won’t take place until the 2024-25 FAFSA cycle, ED has implemented a few changes early as authorized in the legislation, including the elimination of the suspension of federal student aid eligibility for applicants with certain drug-related convictions, and the requirement that male students must register with the Selective Service before the age of 26 in order to be eligible for federal aid. While the related questions won’t be removed from the FAFSA until the 2023-24 award year, they won’t have any effect on a student’s eligibility in the meantime.

## The Timing

Since 2016, the upcoming award year’s FAFSA has been made available on Oct. 1. Previously, the form was made available on Jan. 1 during the prior award year. The change was made to allow students to apply for financial aid earlier, so that they could ultimately learn about their financial aid earlier and have more time to make informed, thoughtful

decisions about where they would attend college. While it’s only the fifth year of the FAFSA being available Oct. 1, data show<sup>36</sup> that minority students and students from low-income backgrounds are still not completing the form until later in the cycle, and therefore not gaining more time to make important decisions about college attendance. While the change was designed to help low-income and under-resourced students, it appears to be benefitting higher income, financially savvy families the most. It may, in fact, be exacerbating the many inequities that already exist within the application process. The move from Jan. 1 to Oct. 1 for FAFSA availability has also shifted state financial aid priority funding deadlines in some states. As states move their priority deadlines closer to Oct. 1, and we know that wealthier families are the ones completing the FAFSA earlier, then we can also assume that lower-income families are missing priority deadlines for additional funding opportunities.

## The Questions Asked

The changes made in the Consolidated Appropriations Act, 2021 will greatly reduce the number of questions every applicant has to answer on the FAFSA, particularly for the lowest income students. It will also import tax information directly from the Internal Revenue System (IRS) into the FAFSA, streamlining the application process for students and families. However, these changes will not be implemented until award year 2024-2025.

One thought leader noted that some students are actually fearful of the process because of some of the information they are required to supply. For example, the requirement to provide a social security number can be traumatic for undocumented students and their families, many of whom are students of color.

<sup>36</sup> <https://www.ncan.org/news/573024/FAFSA-Completion-Dclines-Nearly-5-Nation-Loses-270K-FAFSAs-Since-2019.htm>

“Another challenge is not only the breadth and depth, but the requirement of information in some cases, and with certain groups that we work with. They are distrusting of the federal government. They’re concerned about sharing this information. They’re concerned about their revenue streams and impact of taxation and insurance tax and IRS and ICE and all kinds of threats. And so many of the would-be nontraditional-age students, students of color live in fear. And so fear, I would say, is another barrier.”

While the formula, form, and process will see significant improvements by award year 2024–25, it is worth noting that there have been proposals<sup>37</sup> to eliminate the FAFSA completely and simply rely on the federal tax form to determine financial aid eligibility. While such a solution would require important discussions on the balance of accuracy versus simplification, this kind of bold thinking should continue, especially once we assess the ways in which the new changes impact the system.

## Verifying the Information

Once students make it past the application process, another hurdle awaits—the verification of FAFSA information. Each year, ED selects millions of applications for further review. While the financial aid community is able to deduce certain conditions that may flag an application for verification by ED, such as inconsistencies in the application or Pell-eligible status, the selection formula is largely proprietary, and the specifics of the algorithm are unknown. For those applicants selected for verification, schools are required to validate the

submitted information to ensure accuracy of both the FAFSA data and the financial aid awarded. This additional step in the aid application process is called “verification” and remains a complicated and time-consuming burden for the students and families who are most in need of financial aid.<sup>38</sup>

While verification is an important step in maintaining the integrity of federal aid programs, it imposes a significant burden on students, particularly the lowest-income students. Almost all applicants selected for verification are eligible for the Pell Grant, as the federal government is especially concerned that Pell Grant dollars, which do not have to be paid back, are correctly awarded to the neediest students. According to ED data, over half of Pell-eligible applicants were selected for verification in 2015–16. Unfortunately, this means many of the lowest-income students, or those most in need of financial aid, are targeted with heightened complexity, additional scrutiny, and potentially delayed aid notification. It is estimated that more than one in five low-income students selected for verification never complete the process.<sup>39</sup>

In most cases, the verification process takes weeks to complete due to its manual nature. This has serious consequences for many students, especially those seeking to attend open-access institutions who sometimes file applications much later in the cycle. Of the 600 financial aid administrators surveyed in 2016 by The Institute for College Access and Success, 34 percent said verification almost always or often resulted in award amounts remaining undetermined after the semester had started, and

<sup>37</sup> [https://www.help.senate.gov/imo/media/doc/Final\\_draft\\_Onepager%20for%20fin%20aid%20bill%20with%20Bennet.pdf](https://www.help.senate.gov/imo/media/doc/Final_draft_Onepager%20for%20fin%20aid%20bill%20with%20Bennet.pdf)

<sup>38</sup> [https://www.nasfaa.org/uploads/documents/NASFEE\\_Issue\\_Brief\\_Verification.pdf](https://www.nasfaa.org/uploads/documents/NASFEE_Issue_Brief_Verification.pdf)

<sup>39</sup> National College Access Network, The Leaky FAFSA Pipeline, <https://collegeaccess.org/news/news.asp?id=456419>

56 percent reported that the process almost always, often, or sometimes resulted in students being unable to enroll on time.<sup>40</sup>

There is good news on the verification front from the Department of Education, as it announced in August 2021 that it would be making changes to the verification process for the 2021-22 award year as a means of providing relief to students financially challenged by the pandemic and to reduce barriers to enrollment for millions of low-income students. Specifically, effective July 13, 2021, and for the remainder of the 2021-22 FAFSA processing and verification cycle, ED stated it would be waiving verification requirements for most FAFSA information, except for the identity/statement of educational purpose and high school completion status. While this waiver was impactful for the 2021-22 award year, ED has not included the waiver in its published 2022-23 verification requirements.

ED officials also reported during their December 2020 annual conference that, after analyzing previous award years, they concluded that the costs of verification exceed the benefits when more than 18 percent of FAFSA filers are selected.<sup>41</sup> Traditionally, around 30 percent of FAFSA filers have been selected for verification. For the 2018-19 FAFSA cycle, only 22 percent were selected, and as of Oct. 1, 2020, only 18 percent of filers had been selected.<sup>42</sup> This means that the 2021-22 FAFSA cycle has seen the lowest verification selection rate in some time.

In addition to improving the financial aid application process, the FUTURE Act, once fully implemented for the 2024-25 award year, is expected to greatly reduce the burden placed on financial aid applicants who must complete verification. The FUTURE Act will allow tax information to be transferred directly from the IRS into the student's FAFSA and thus will already be considered verified data. Ideally, this should lead to a reduction in applications selected for verification and a corresponding reduction in the associated burdens experienced by students and institutions.

### **Recommendations:**

#### *Financial Aid Office:*

- **Add FAFSA availability to financial aid materials.** Financial aid offices should incorporate the Oct. 1 FAFSA availability date on their informational materials to students, if they are not already doing so. The earlier that students are able to complete the FAFSA, the more time they have to gather the documents they may need for verification if selected, or to receive a financial aid offer and make a well-informed decision.
- **Make financial aid offers available as quickly as possible.** To ensure that the intent of the Oct. 1 FAFSA date is met, financial aid offices should work to notify applicants of their aid offer as quickly as possible and earlier than they did when the FAFSA was available Jan. 1.

<sup>40</sup> [https://ticas.org/wp-content/uploads/legacy-files/pub\\_files/on\\_the\\_sidelines\\_of\\_simplification.pdf](https://ticas.org/wp-content/uploads/legacy-files/pub_files/on_the_sidelines_of_simplification.pdf)

<sup>41</sup> <https://fsaconferences.ed.gov/conferences/library/2020/2020FSAConfSessionBO19.pdf>

<sup>42</sup> *ibid*

*Federal:*

- **Prohibit unwarranted use of student and parent FAFSA data.** Incorporate a provision in statute that would explicitly prohibit ED from using FAFSA information for any other purpose than for the application, award, or administration of student aid programs or approved data-sharing relationships.
- **Codify the Oct. 1 release of the FAFSA.** The Oct. 1 release of the FAFSA allows prospective students more time to complete their FAFSA before important state and institutional aid deadlines, as well as gives institutions more time and flexibility in preparing aid offers for prospective students. By having this extra time, institutions are able to get aid offers to students faster, allowing them more time to review and compare aid offers, and make the best financial decision for themselves and their families. The shift to using the Oct. 1 release of the FAFSA by ED using its authority under the Higher Education Act (HEA) represents first steps in simplifying the federal aid application process; however, to solidify this progress, Congress should codify the change into statute.
- **Extend the 2021-22 verification waiver.** All of the reasons that ED cited for offering these waivers previously will continue to exist next year, and not extending these waivers for 2022–23 will have serious negative consequences for both students and schools. Low-income and vulnerable students, who are most burdened by verification, have borne the brunt of this pandemic and not renewing the verification waiver will make the college admission process that much more difficult.
- **Collect data following the expiration of the verification waiver.** ED should collect and track data after the post-waiver expiration specifically exploring:
  - The impact of the verification waiver on enrollment trends,
  - Instances of overpayments and underpayments, and
  - Changes in EFCs from previous award years, the waiver award year, and future award years to assess the impact of the waivers on federal spending.

ED should also continue to study changes as they relate to verification through the implementation of the FUTURE Act.

**ED should also continue to study changes as they relate to verification through the implementation of the FUTURE Act.**



# How We Make Admission Decisions

## Tolls on the Road to College?



### Key Design Observation

A student's body of work in K-12 education should be the nearly exclusive focus for taking the next step to postsecondary education. Each additional requirement beyond their work in secondary school acts as a toll, which exerts a negative effect on equity.

Admission requirements are a consistent challenge for under-represented students of color, mainly because many requirements act more as hoops for them to jump through than substantive measurements of capability.

### Centrality of the Educational Record

A student's educational record constitutes the primary criteria for evaluation at all levels of postsecondary education. Whether an open-enrollment institution, which requires proof of

### To Improve Design for Equity

Radically rethink the criteria upon which we make admission and financial aid decisions to minimize the steps students need to take outside of their K-12 experience.

graduation from secondary school, or a selective admission institution, the body of work that a student develops over many years of study is, as it should be, the most important factor in the decision to admit a student.<sup>43</sup>

<sup>43</sup> Clinedinst and Hair, 2019.

As students get older and enter high school, access to rigorous courses and an intensive college-prep curriculum becomes very important to their goal of attending college. Unfortunately, schools serving students with lower socioeconomic status and schools serving high rates of minority students often lack these important resources (Perna et al., 2015). College-prep offerings like Advanced Placement, the International Baccalaureate Diploma Programme, and dual enrollment programs are often not available to high-poverty schools serving minority students (Perna et al., 2015). When these schools do gain access to these programs, significant barriers remain before these programs become truly accessible and equitable for all students (Kolluri, 2018). For example, while overall availability of International Baccalaureate courses increased

	Percent of schools with <i>high</i> Black and Latino student enrollment where subject is offered.	Percent of high schools with <i>low</i> Black and Latino student enrollment where subject is offered.
Calculus	33	56
Physics	48	67
Chemistry	65	78
Algebra II	71	84 <sup>44</sup>

dramatically from 1995 to 2009, there was little change in the number of Black students attending schools with IB programming (Perna et al., 2015), indicating there is a long way to go before these programs are equitably available to all students.

Black and Latino students have less access to high-level math and science courses, as demonstrated in the following tables.

Here again, there are systemic effects associated with the core elements of the pathway to postsecondary education that result in racial inequity. In this case, differential access to courses—aside from student performance—constitutes a barrier that disproportionately affects students of color. As a result, we must question whether emphasis on specific courses limits our ability to identify qualified students. For instance, Just Equations, a nonprofit organization dedicated to reconceptualizing the role of math in ensuring educational equity, notes that “a growing body of evidence points to the need and potential for redesigned math policies that reduce, rather than reinforce, inequities in K-16 education. At stake is not just math learning, but the broader architecture of opportunity that is shaped by math requirements. When educational requirements are arbitrary, outdated, or unfounded, they create barriers rather than gateways to students’ success.”<sup>45</sup> In short, even our focus on certain core

	Percent of Black and Latino students attending schools offering subject	Percent of Black and Latino students enrolled in subject	Percent of white students attending schools offering subject	Percent of white students enrolled in subject
Calculus	36	21	55	61
Physics	37	35	54	53
Algebra II	38	37	53	53

<sup>44</sup> “2013-14 Civil Rights Data Collection, A First Look: Key Data Highlights on Equity and Opportunity Gaps in Our Nation’s Public Schools,” U.S. Department of Education, Office for Civil Rights, 2016. <https://ocrdata.ed.gov/assets/downloads/2013-14-first-look.pdf>

<sup>45</sup> See <https://justequations.org/about/>

curricular notions need to be regularly reviewed and challenged if we are to be adaptive in responding to persistent equity concerns.

### **Addressing Inequities in Grading and Curricula**

An important component of this project's discussion is that even the most fundamental element of the high school student experience—their grades—is a flawed measure, both by its inadequacy in fully portraying a student's potential and in the way that this measure, too, is subject to the influence of systemic racism, as noted above. However, **the critical distinction that we make between the high school record and other factors typically considered in admission decisions is that beyond the high school record, other experiences are derivative and often compound, thereby magnifying racial inequities.** As such, any redesign of the admission process must minimize, not amplify, racial inequities.

Work is well underway to expand upon the way we evaluate students in K–12 education, an exploration that has direct implications for postsecondary admission. As an example, the Learning Policy Initiative's "Reimagining College Access"<sup>46</sup> initiative has explored ways in which the rich information contained in performance assessments can be leveraged to accomplish two long-standing desires of admission offices, including (1) providing richer, more contextual information about students' abilities that can transcend traditional, constricted indicators of achievement, and (2) introducing information into the admission process to better enable institutions to predict student success at their institution. (As is noted below, the current mix of

admission variables provides only limited ability to predict student success.)

*Many colleges have signaled their interest in having access to such information and in developing and knowing students' qualities of character, commitment, and resilience. Although it is not a simple thing to change the data used for college admission, there is widespread agreement among colleges about the need to increase the success of college students, especially underrepresented students of color and students from low-income backgrounds who often are the first in their families to attend college. As a result, a growing number of colleges are seeking more ways to recognize and encourage the development of student abilities that go beyond standardized test scores.*

*Indeed, while incremental, the trend in college admission is away from over-reliance on multiple choice standardized tests, toward broader explorations of student knowledge and skills that go beyond identifying one right answer out of five and instead to a demonstration of what students can do to apply their learning in the real world. If higher education were to encourage performance assessment results to inform admission, placement, and advising, colleges would benefit from high school curricula more focused on higher-order thinking and performance skills. Not only would students' true skills and potential be more fully represented, but K–12 systems would be more likely to invest in developing and implementing project-based curricula and quality assessment systems that foster the analytic and performance skills essential for postsecondary success. Moreover, these efforts could reinforce similar efforts in higher education to improve how postsecondary learning outcomes are assessed and acted upon to improve student outcomes and promote quality academic programs.<sup>47</sup>*

<sup>46</sup> See: <https://learningpolicyinstitute.org/project/reimagining-college-access>

<sup>47</sup> Guha, Roneeta, Wagner, Tony, Darling-Hammond, Linda, Taylor, Terri, and Curtis, Diane. "The Promise of Performance Assessments: Innovations in High School Learning and College Admission," Learning Policy Institute, January 2018. The Promise of Performance Assessments: Innovations in High School Learning and Higher Education Admissions ([learningpolicyinstitute.org](https://learningpolicyinstitute.org))

In the particular case of performance assessments, information about students' strengths is embedded in the grading rubrics themselves, meaning that colleges would not have to ask students to submit additional materials and would not be left to try to glean information about a student's background from other sources. Systems such as this can also introduce more opportunities to consider factors that often facilitate easier entry or re-entry of adult students. Research suggests that adult students often suffer from the distance from their secondary school experience and from institutional policies and procedures ill-suited to fit their credentials and experiences.<sup>48</sup>

*"We still require them to fit in this very traditional box, even though we say that we want nontraditional students to be a part of higher education spaces."*

– Thought leadership panel participant

## Standardized Testing

From a design standpoint, standardized admission testing presents a tantalizingly, although ultimately deceptive, simplicity. In practice, **standardized admission tests represent a significant detour on the road to postsecondary education**, as they are external to the high school curriculum, add to the cost of applying to college, require access to "college knowledge" that is not uniformly understood, and present an additional obstacle to be surmounted. Added to this abstract view of the pathway to postsecondary education are significant and long-standing concerns about inequitable differences in test score outcomes, which make the tests yet more problematic.

Over the past two decades, the admission profession has undergone a transformation, accelerated by the COVID-19 pandemic, toward test-optional admission policies. In 2008, NACAC's Commission on the Use of Standardized Tests in Undergraduate Admission recommended that, in part based on continuing equity concerns stemming from persistent test score differences between racial and ethnic groups, colleges and universities should "regularly question and reassess the foundations and implications of standardized test requirements." The commission further noted that "although many colleges find benefit in using admission tests in admission decisions...there may be more colleges and universities that could make appropriate admission decisions without requiring standardized admission tests such as the ACT and SAT. The Commission encourages institutions to consider dropping the admission test requirements if it is determined that the predictive utility of the test or the admission policies of the institution support that decision."<sup>49</sup>

Research conducted on behalf of NACAC and published in 2016 raised the important question, "Can an institution legitimately require standardized admission test scores without knowing what the scores provide them?" Of the institutions that required students to submit admission test scores, only 51 percent conducted predictive validity research to determine what effect test scores had on the institution's ability to predict student success.<sup>50</sup>

<sup>48</sup> Ibid.

<sup>49</sup> Report of the Commission on the Use of Standardized Tests in Undergraduate Admission," National Association for College Admission Counseling, 2008. <https://files.eric.ed.gov/fulltext/ED502721.pdf>

<sup>50</sup> "Use of Predictive Validity Studies to Inform Admission Practices," National Association for College Admission Counseling, 2016. <https://www.nacacnet.org/globalassets/documents/publications/research/testvalidity.pdf>



Most recently, a NACAC task force posed the critical question of whether the costs of admission tests to students and to the high schools that administer them present a civil rights concern.

*Under the current system, the financial foundation of the administration of standardized testing rests exclusively on students and their families. Direct costs include exam registration fees for each test administration, as well as the costs students encounter when requesting additional score reports beyond those allotted by the testing agencies. Yet it's institutions—not students—who ultimately capitalize on the final product, using the scores submitted by applicants as a third-party certification of student qualifications. This system in itself is problematic, particularly when viewed through an equity and access lens. Financial structures that impose a flat, standardized fee for access are inherently regressive. Moreover, when the service for which individuals pay is connected to a public good, such as entry to higher education, the system by which the service sustains itself must be examined critically to determine whether access is restricted at the very source.<sup>51</sup>*

As with so many other elements of the college admission process, this burden falls disproportionately on low-income students, a disproportionate number of whom are students of color. Government subsidies and fee waivers are in place, though they, too, present distracting qualities—the former diverts funding away from more core K-12 services, while the latter once again requires low-income students (and many students of color) to “prove that they are poor.” We must

look beneath the layers of barriers, ultimately, to get to the student’s essence—to the real proof of the potential within each student.

During this project, we received a great deal of input from entities with an interest in our work. One example involved a summer science program for high school students at a selective institution in which under-represented students were given the opportunity to study alongside faculty, often resulting in published work in academic journals. However, the program’s director noticed that a disproportionate number of former program participants were being rejected by the institution’s admission office when they applied for undergraduate study. The problem? Lower test scores were filtering students out in the institution’s initial screening process. To rectify this type of challenge, a consortium is developing a “next generation” accreditation model [for pre-college STEM programs] that will serve as a mechanism for communicating the power of pre-college programs to admissions offices.”<sup>52</sup>

Often, institutions with large applicant pools will employ initial screening indexes to reduce the number of applications receiving an individualized read. In 2008, the NACAC testing commission referenced earlier in this section warned of the potential inequitable effects of the index model:

<sup>51</sup> Ibid., p. 12-13.

<sup>52</sup> “A Big Problem Spawns A Good Idea; A Good Idea Turns into Action,” STEM Push Network, See: <https://www.stempushnetwork.org/a-big-problem-spawns-a-good-idea-a-good-idea-turns-into-action/>

*For most colleges and universities, admission test scores are rarely (if ever) used as a uniform “line in the sand” beyond which no student may enter the institution. However, there are a substantial number of institutions that rely on an academic index, which averages or otherwise compiles numeric academic achievement indicators into a single indexed number. Preliminary decisions about whether a student is definitely admissible, possibly admissible, or not admissible may be made on the basis of the index score. In such systems, the Commission recommends that admission policymakers and practitioners remain aware of the implications of inequitable access to test preparation as they design and implement index systems. Maintaining a commitment to contextual decision-making in admission—ensuring that there is enough flexibility to evaluate candidates based on the entirety of their application—is critical, in the opinion of the Commission, to the fairness of such systems.<sup>53</sup>*

The STEM summer program director worked with the admission office to alter the initial screening index to minimize or eliminate the influence of test scores, particularly if students had already demonstrated the ability to study and be published through the institution’s own programs. While this represents a single institutional experience, the implications for all of postsecondary education are significant—that we may be weeding out some of the best and brightest students by using outdated, potentially discriminatory methods to screen students.

## Other Factors in the Admission Decision

College admission offices, particularly at selective institutions, often require additional factors as part of the college application. Those factors are outlined in the table below.<sup>54</sup> While not all colleges require every factor, each additional consideration can present an additional barrier for students. For example, the requirement that students submit counselor recommendations can present a significant challenge for students whose schools do not have school counselors or whose school counselors are overwhelmed with high student-to-counselor ratios, both of which are disproportionately likely to affect students of color.

A 2021 Institute for Higher Education Policy (IHEP) report noted that these requirements can, if left unchecked or unexamined, perpetuate privilege and exclude qualified candidates absent “extensive training for admissions staff...and equity-minded recruitment strategies to level the playing field.”<sup>55</sup> The IHEP report’s finding that “racial disparities leave many students without an intimate knowledge of the college admissions process”<sup>56</sup> represents a clear alignment to our project.

The alignment between these two efforts further underscores our point: Admission systems that are designed for equity will need to be mindful of how additional requirements affect students of color to ensure that we do not amplify deeply embedded

<sup>53</sup> Report of the Commission on Standardized Tests in Undergraduate Admission, National Association for College Admission Counseling, 2008. <https://files.eric.ed.gov/fulltext/ED502721.pdf>

<sup>54</sup> Clinedinst and Hair, 2019.

<sup>55</sup> “The Most Important Door That Will Ever Open: Realizing the Mission of Higher Education Through Equitable Admissions Policies,” Institute for Higher Education Policy, June 2021. [https://www.ihp.org/wp-content/uploads/2021/06/IHEP\\_JOYCE\\_full\\_rd3b-2.pdf](https://www.ihp.org/wp-content/uploads/2021/06/IHEP_JOYCE_full_rd3b-2.pdf)

<sup>56</sup> Ibid.

**Percentage of Colleges Attributing Different Levels of Importance to Factors in Admission Decisions: First-time Freshmen, Fall 2018**

Factor	N	Considerable Importance	Moderate Importance	Limited Importance	No Importance
Grades in All Courses	220	74.5	15.0	5.5	5.0
Grades in College Prep Courses	220	73.2	16.8	5.9	4.1
Strength of Curriculum	219	62.1	21.9	8.7	7.3
Admission Test Scores (SAT, ACT)	221	45.7	37.1	12.2	5.0
Essay or Writing Sample	220	23.2	33.2	24.1	19.5
Student's Demonstrated Interest	218	16.1	23.9	28.0	32.1
Counselor Recommendation	218	15.1	40.4	26.6	17.9
Teacher Recommendation	219	14.2	40.2	26.5	19.2
Class Rank	220	9.1	29.1	34.1	27.7
Extracurricular Activities	219	6.4	42.9	32.0	18.7
Portfolio	219	6.4	11.9	26.9	54.8
Subject Test Scores (AP, IB)	219	5.5	18.3	35.2	41.1
Interview	219	5.5	16.4	28.3	49.8
Work	217	4.1	28.6	36.9	30.4
State Graduation Exam Scores	218	2.3	8.7	18.8	70.2
SAT II Scores	216	1.9	5.6	14.8	77.8

Source: NACAC Admission Trends Survey, 2018-19.

racial inequities. As several students noted in our project, the expectation that they will put their trauma or disadvantage on display through personal essays, interviews, and other extracurricular means constitutes a hidden barrier in the system, as well as another example of “proving hardship” where others do not bear the same expectation. Many of our student interviewees were acutely aware of the commonly perceived expectation that in order to be accepted to the school of their choice they must reveal their most vulnerable experiences:

*“[To have to] put your trauma on a show, to...narrate to them why you deserve to be there, in retrospect, I think it produced a little trauma having to relive and revive my trauma in stories [and] essays, and read it over and over again, just to submit and get accepted to schools.”*

– Student interviewee

The burden placed on students to meet such specific and varying admission criteria seems antiquated when we consider the scope of digital data collection now available to us. In an age when amateur observers can identify classified missile sites in other countries using publicly available technology resources,<sup>57</sup> there seems to be no end to the potential

<sup>57</sup> “Open-Source Intelligence,” *The Economist*, Volume 440, Number 9257, p. 18-21.

for colleges to better utilize the information and data that flows from the student experience. While contextual information will still be vitally important to gain a full understanding of a student's background and talents, our work on this project suggests that there may be other ways to compile contextual information without placing yet another burden on students already at a disadvantage.

## Recommendations

### *Admission office:*

- **Re-center the process of evaluating students to focus on a recognition of the array of strengths, skills, and abilities students demonstrate during the K-12 educational experience.** Explore new and more contextual K-12 evaluation processes as a method for evaluating students' experiences, skills, achievements, and abilities while taking the racial contexts students experience into account. Correspondingly, consider minimizing or eliminating external assessments and requirements that introduce new barriers that disproportionately affect students of color.



### *Institutional:*

- **Allocate greater care, attention, and resources to the application review process to provide more time/space for the institution to review applications for admission in a more contextual fashion.** Redesigning application and admission processes to align with racial equity goals takes time and thoughtfulness, as there are many ways in which current admission practices are attached to goals that can run counter to increased equity. Providing the support and political capital for such reviews are needed to focus attention on equity and assist the campus community in contributing to and embracing any new direction.

### *State/Federal:*

- **Consider state policies that afford institutions the opportunity to maximize the focus on K-12 experiences and minimize the focus on external requirements or assessments.** Review legislative or statutory requirements that prescribe specific GPAs or other indicators to determine whether there are better, more comprehensive ways to evaluate students. Provide institutions with the flexibility to embrace promising new methods of assessing student skills and abilities. In states where standardized test scores are currently required for admission to public postsecondary institutions, consider removing requirements in favor of a more flexible approach that affords postsecondary institutions the ability to incorporate new, more equitable metrics into their admission decisions.

# The Admission Staff

## The Face of the Institution



### Key Design Observation

Students need to see themselves reflected in the face of postsecondary education. The more diversity we can encourage in postsecondary admission offices, the greater our ability to attract and relate to a diverse student population.

### To Improve Design for Equity

Present an interface that will be widely understood and accessible by students from different racial, social, and cultural backgrounds.

*“I would change the entire language.”*

– Student interviewee

## The Composition of the Admission Office

*“Students need a process that looks more like what they understand. As it is, applying to college is very isolating and there is no community. This process is very drawn out and overwhelming, not student-centric at all.”*

– Thought leadership panel participant

According to past research, non-whites are underrepresented at all points on the admission career trajectory, and the issue only becomes more pronounced at higher position levels. The proportion of Blacks in the admission profession decreases from 11 percent of counselors and assistant/associate directors to 5 percent of vice presidents/deans, while the proportion of Hispanics decreases from 8 percent to only 2 percent.<sup>58</sup> More recent research from the American Association of Collegiate

<sup>58</sup> Career Paths for Admission Officers: A Survey Report, National Association for College Admission Counseling, 2014. <https://www.nacacnet.org/globalassets/documents/publications/research/careerpaths2014.pdf>



Registrars and Admission Officers suggests that there are more Black professionals serving in chief enrollment management and admission positions than before, but the large majority (more than 80 percent) of chief officers in both subfields are white.<sup>59</sup> As students of color approach postsecondary institutions, particularly those that are predominantly and disproportionately white, the absence of people who understand their experience can present barriers that white students do not face. Particularly in situations where Black students and students of color have felt compelled to write about their personal or cultural experiences for admission, the act of sharing those diverse stories with predominantly white admission staff can present gaps in understanding. As one student put it:

*“The way she responded [to my personal essay] just made me feel like she probably hasn’t had a lot of experience with people who are like me.”*

– Student interviewee

Institutions of higher education often struggle to achieve greater diversity among faculty and administration. Importantly, achieving greater equity for under-represented racial minority students will comprise a significant step forward in achieving diversity among higher education professionals of all kinds. Until we achieve greater equity in the student body, admission and financial aid offices will have to be mindful of their staff demographics and how such demographics interact with their ability to attract and recruit Black students.

Studies examining racial diversity in hiring suggest that the process is complex, but achievable. A recent summary of 154 academic studies on diversity in hiring at postsecondary institutions outlined four phases of the academic hiring process, which can be applied to the hiring of admission and financial aid officers as well, including position framing and search committee (or those responsible for interviewing/recommending hires); marketing, outreach, and recruitment; evaluating candidates; and short lists and final decisions.<sup>60</sup>

While they acknowledged the positive intentions on the part of both institutions and admission/financial aid offices, it was clear the absence Black perspectives in the admission and financial aid offices presents a tacit, unintended barrier to entry for many Black students, particularly those who are first in their family to attend college. A common story involved Black students persisting **despite** setbacks, slights, and other disconnects with institutional staff because of race. Indeed, a student involved in this project noted that at several points along her own path to admission she was presented with comments, behaviors, or attitudes that, whether intentionally or unintentionally, made her feel as if she did not belong. She witnessed peers veering away from such experiences, sometimes even out of the college pipeline altogether, but she persisted and gained admission to a selective college. This story, however, is not to be seen as a model, but as a cautionary tale that for each student of color who persists through the process, there may be many more who were discouraged and shunted to the side.

<sup>59</sup> 2019 Chief Admission Officer Career Profile and 2020 Chief Enrollment Management Officer Career Profile, American Association of Collegiate Registrars and Admission Officers. [https://www.aacrao.org/docs/default-source/research-docs/career-profile/2019-chief-admissions-officer-report.pdf?sfvrsn=7ddf2f8b\\_6](https://www.aacrao.org/docs/default-source/research-docs/career-profile/2019-chief-admissions-officer-report.pdf?sfvrsn=7ddf2f8b_6) and <https://www.aacrao.org/docs/default-source/research-docs/career-profile/2020-chief-enrollment-management-officer-career-profile-report.pdf>

<sup>60</sup> O'Meara, KerryAnn, Culpepper, Dawn, and Templeton, Lindsey (2020). Nudging Toward Diversity: Applying Behavioral Design to Faculty Hiring. *Review of Educational Research*, American Educational Research Association. <https://education.umd.edu/sites/education.umd.edu/files/Nudges%20in%20Hiring.pdf>

## Anti-Racism and College Admission

In an ideally designed system, a student's race would not be the source of advantage or disadvantage, ease or difficulty. Yet our work with the students in this project suggested that race was prominent in their experience with the admission process.

*"They put a name to a face, [and] they seem very shocked when meeting me. As a high school student, back then, [I told myself], just go along with it. But looking back now, being older, they didn't expect me to be the person on that application. And I could tell."*

– Student interviewee

The work of rethinking the admission interface for racial equity will be complex. A student's path, which can begin with the institution's website, continues through publications, interactions with institutional representatives (including admission officers, students, and alumni), phone calls and emails, public events like college fairs, visits to high schools, and campus visit programs. Most often, students relayed their frustration at having to write about their struggles with the barriers that systemic racism present.

That students of color feel the need to present a certain profile—often involving struggle, hardship, or deficits—suggests that there is also something about the receiving entity (admission office) that signals, whether intentionally or

unintentionally, that students of color represent a specific or "other" profile. Indeed, students in our project suggested that the process made them feel as if they were an "other" or being lumped into existing cultural stereotypes:

*"[Why should] minority students have to showcase this resiliency like they are superhuman in order to get into college?"*

– Student interviewee

Research has pointed us to the effects of implicit bias in the application review process, so continuing the work of eliminating such bias is required if we are to move toward a more equitable system. Recent research suggests that manifestations of bias can begin well before the application is ever received, influencing even which students receive responses to initial inquiries about applying to the institution.<sup>61</sup> As one student said, this can even affect which students apply, at all:

*"You constantly see colleges approach certain high schools and students because they have a preconceived view of them. They're like, that's a student that belongs here, and if you don't fit that description then why would you even bother applying?"*

– Student interviewee

These student experiences also validate research that has indicated systemic racial and socioeconomic bias in recruitment practices at many institutions.<sup>62</sup> Such research is grounded in

<sup>61</sup> Thornhill, Ted. "We Want Black Students, Just Not You: How White Admissions Counselors Screen Black Prospective Students," *Sociology of Race and Ethnicity*. American Sociological Association, Volume 5, Issue 4: p. 456-470. <https://journals.sagepub.com/doi/full/10.1177/2332649218792579>

<sup>62</sup> Jaquette and Han, 2020. <https://www.thirdway.org/report/follow-the-money-recruiting-and-the-enrollment-priorities-of-public-research-universities>. See also Salazar, Kariana, Jaquette, Ozan, and Han, Crysai, "Coming Soon to a Neighborhood Near You? Off-Campus Recruiting by Public Research Universities," *American Educational Research Journal*, May 14, 2021. <https://journals.sagepub.com/doi/10.3102/00028312211001810> and Institute for Higher Education Policy, June 2021. [https://www.ihp.org/wp-content/uploads/2021/06/IHEP\\_JOYCE\\_REPORT\\_CH1\\_Recruitment.pdf](https://www.ihp.org/wp-content/uploads/2021/06/IHEP_JOYCE_REPORT_CH1_Recruitment.pdf)

decades of work indicating that college visits to high schools can often result in a “feeder” network of schools with large numbers of higher-income, predominantly white students from which colleges can reliably enroll full-paying students. While, as most analyses acknowledge, the roots of this phenomenon are planted in a system that results in institutions, particularly publicly supported colleges, needing to enroll a large number of full-paying students in order to meet revenue. Here again lies evidence of the systemic nature of the challenge we face, for without more substantial funding for postsecondary education, institutions will continue to struggle to achieve truly equitable practice.

*“[N]ot once did schools that I was applying to come visit my high school.”*

– Student interviewee

The key question that arises from these discussions is whether there are better, more equitable ways to introduce colleges to prospective students. The COVID-19 pandemic, while exacerbating racial inequities on a broad scale, nonetheless offered new opportunities to connect with students digitally. And while there is a digital divide that manifests its own racial inequities, the potential for connecting students to colleges directly, particularly in the high school setting, holds much promise.

As institutions expand programs for adult learners, it will be increasingly important to ensure that recruiting efforts are crafted to ensure racial equity. As the market for adult education expands, particularly in online education, the recruitment function is increasingly outsourced to Online Program Management companies (OPMs).<sup>63</sup> Institutions must be cautious, however, to ensure that OPMs follow the same recruitment standards of practice that the college’s full-time admission staff employ. The temptation to value dollars over students can lead to inequitable outcomes.<sup>64,65</sup> As evidenced by unscrupulous actors in the for-profit college sector, targeting Black and other minority students presents equity challenges in higher education, particularly for adult students, as many students are left with large amounts of student debt but little to show in the way of a degree or certificate.<sup>66</sup>

*“Race [was] an effect, taking advantage of people because you don’t know much; fresh out of the military, all you’re thinking about is that you’re going to college—you’re not thinking of anything else.”*

– Student interviewee

<sup>63</sup> 7 Things You Should Know About Online Program Management, EDUCASE Learning Initiative, February 2020. <https://library.educause.edu/-/media/files/library/2020/2/eli7171.pdf>

<sup>64</sup> Mattes, Margaret. The Private Side of Public Higher Education, The Century Foundation, August 2017. <https://tcf.org/content/report/private-side-public-higher-education/>

<sup>65</sup> Dudley, Taela. How Colleges Can Get Online Education Right, The Century Foundation, March 2020. <https://tcf.org/content/report/colleges-can-get-online-education-right/>

<sup>66</sup> For-Profit Colleges and Racial Justice: Perpetuating Racial Inequity Under the Guise of Higher Education, Legal Services Center of Harvard Law School. <https://predatorystudentlending.org/predatory-industry/racial-justice/>

Preventing this form of inequity is particularly important, as the deleterious effects of predatory recruitment cause students real financial harm and erode the trust of all stakeholders in institutions of postsecondary institution. In the case of for-profit colleges, not only are Black students more likely to enroll, they also carry a much higher burden of student loan debt and are significantly more likely to default.<sup>67</sup>

Ensuring that recruitment practices for adult students do not prioritize revenue over student well-being and success is critical to equitable postsecondary education.

## Recommendations

### *Admission office:*

- **Prioritize racial equity in admission staff composition and practice, with an emphasis on data-informed practice.** Make a concentrated effort to hire and retain admission staff who reflect racial diversity, grounded in the growing diversity of the student population. In addition, conduct anti-racism trainings for admission staff. Such practices will reduce bias in the admission office and provide a demonstrable connection to students of color, both of which will help such students see themselves reflected in the institution.

- **Conduct regular listening sessions with current and prospective Black students to better evaluate and assess admission communications, publications, outreach, and recruitment practices.** Maintaining an ongoing conversation will help ensure that the admission office is up to date on challenges facing students of color and will give students of color the opportunity to help shape admission policy and practice.

### *Institutional:*

- **Regularly revisit the institutional commitment to racial equity to ensure that processes, staffing, budgets, and priorities are aligned with equity goals.** Institutional planning and support are necessary to afford the admission office the authority, time, and resources it needs to assess its staffing and practices.

### *State/Federal:*

- **Support regular research and engagement that solicits information about the Black student experience with college admission.** Regularly incorporate student feedback into assessment and adjustment of admission and financial aid practices affected by state or federal policy.

<sup>67</sup> Body, Dyvonne. *Worse Off Than When They Enrolled: The Consequence of For-Profit Colleges for People of Color*. The Aspen Institute, March 2019. <https://www.aspeninstitute.org/blog-posts/worse-off-than-when-they-enrolled-the-consequence-of-for-profit-colleges-for-people-of-color/>

# Combating Implicit Biases in the Financial Aid Office

## The Unseen Hurdle



### Key Design Observation

Institutions that do not do proactive work to acknowledge the implicit biases of their processes and employees are fostering inequity.

### To Improve Design for Equity

Encourage an environment where implicit biases are explored and acknowledged in order to combat behavior and practices that have perpetuated systemic racism.

Much research has been conducted on the way that implicit biases (both individual and organizational) can contribute to creating inequity and perpetuating systemic racism. Everyone comes to the table with implicit biases, and they exist in nearly every aspect of life, including daily behaviors, processes, and routines.<sup>68</sup> In acknowledging this, we also acknowledge that these biases exist within the admission and financial aid processes and deserve attention.

In 2020, NASFAA convened a task force to explore how individual and organizational implicit biases could exist within financial aid processes. The group's work concluded with the development of an Implicit Bias Toolkit<sup>69</sup> that offers policies and procedural suggestions that begin to establish a neutral basis from which to build policies and deploy procedures in the administration of financial aid that reduce the operational influence of implicit bias.

<sup>68</sup> [https://www.nasfaa.org/implicit\\_bias\\_toolkit](https://www.nasfaa.org/implicit_bias_toolkit)

<sup>69</sup> Ibid



The Implicit Bias Toolkit identifies several areas where implicit biases could create inequity for students of color due to language, assumptions, required information, and accessibility:

- Institutional forms policy
- Communication policy
- Cost of attendance policy
- Scholarship policy
- Student worker program policy
- School-selected verification policy
- Professional judgment

For example, the process of professional judgment allows institutions to review financial aid appeals on a case-by-case basis. Many institutions have a committee that reviews these appeals, and the toolkit recommends, where possible, that the policy and appeal decisions be made by highly diverse committees composed of multiple professionals both within and outside of the financial aid office. These committees should consider including diversity officers, faculty, and staff to create a well-rounded cooperative that is poised to identify and mitigate implicit biases.

Simple steps can also be taken for professional judgment applications before the file even reaches the committee's hands. Institutions could consider removing unnecessary personal identifiers or bias-prone contexts from files prior to review and ensure that the members of the committee have completed thorough implicit bias training. Additionally, by tracking approved and denied appeals by demographics and reviewing for bias in the results, institutions can identify where policies or procedures may be improved.

Another example relates to institutional aid. For the 2019–20 award year, institutions provided \$68.9 billion<sup>70</sup> in institutional aid. In fact, institutions collectively are the largest source of financial aid for

students. The amount of aid that institutions provide students should be both encouraged and applauded, however, in many instances, scholarship funds are being awarded to affluent students who are already coming from a place of privilege and would likely enroll without the funds. If institutions truly want their scholarship dollars to move the needle on both equity and enrollment, they should construct their scholarship application processes to focus on financial need. As one thought leader stated:

*“More often than not, the criteria for this aid favors more affluent applicants and ignores need. Scholarships should be centered around equity and not perpetuating privilege.”*

## The Academic Criteria

Many scholarships include rigorous academic requirements, including competitive standardized test scores. While these criteria may seem like reasonable requirements as a condition of receiving “free money,” such processes can be inherently inequitable to low-income students, who are disproportionately students of color. Many of these students faced incredible hurdles, including attending high schools without rigorous curriculums, lacking the funds to take courses to help them prepare for standardized tests, and balancing family obligations and caretaking. As one student put it:

*“That was a huge thing...thinking that I wasn't going to get accepted anywhere because my scores are not the best, and, again, I didn't have the privilege to be able to pay a tutor to help me study for it. I did notice my friends who were able to pay for SAT prep improved a lot with their scores through that tutoring, so I just feel like it's just really not for us who don't have the resources to pay for that, or even the time to study, because a lot of us have so much going on—we have to take care of our siblings or help parents pay for rent.”*

<sup>70</sup> CollegeBoard, Trends in College Pricing and Student Aid 2020, <https://research.collegeboard.org/pdf/trends-college-pricing-student-aid-2020.pdf>

Related, these students are also less likely to be involved in the extracurricular activities<sup>71</sup> (e.g., sports or student government) that often play a large role in the scholarship awarding process. These activities are often costly and also require both time and transportation—two things that are a luxury to low-income families.

## Reliving Negative Experiences

Many scholarship applications ask for a student essay, often prompting students to write about how they have overcome challenges or difficult experiences in their life. Several students of color noted that they are often asked this specific prompt and that it can be very discouraging and traumatizing to have to relive difficult moments, simply to show they are worthy of a scholarship. One student put it this way:

*“When will minority or Black students be able to write essays about things that bring them excitement, instead of having to share sad and traumatizing events that happened to them.”*

– Student interviewee

The point here is that something as small as a prompt could lead to students feeling marginalized.

An important caveat, and one not to be diminished, is that institutions have a vested interest in ensuring that their scholarship dollars will go to students who will succeed. However, there are many students with academic potential who may be excluded by extremely selective criteria. Given that something as small as a prompt on an essay can make a student feel marginalized, institutions can combat inequity by devoting time to the thoughtful development of scholarship criteria.

## Recommendations:

### Financial Aid Office:

- **Develop priority deadlines for aid or work opportunities.** Developing priority deadlines that encourage productivity but are not punitive, so that exceptions can be made, allows students who may have missed deadlines due to conditions out of their control to have an opportunity to still receive aid they would have been eligible for.
- **Review the institutionally selected verification policy.** Outside of verification required by ED, institutions can also require additional verification. To avoid implicit bias in their own selection processes, institutions should determine by data analysis the characteristics of applications that are routinely school-selected and the error rate found as a result of the institutional verification. This analysis will help institutions focus their verification efforts on items with a high error rate and impact on aid eligibility.

### Institutional:

- **Ensure fairness and equity for institutional aid or scholarships.** We recommend that schools review, evaluate, and streamline their entire process of administering scholarship funds. Scholarship committee members, including alumni, should be provided with implicit bias awareness training and the committee should be made up of a diverse population of administrators. Scholarship applications should be designed so that schools collect only information pertinent to awarding decisions, and when selecting recipients, it is best to remove personally identifiable information, such as name, date of birth, or postal code.

<sup>71</sup> Quaye, Stephen John, Shaun R. Harper, and Sumun L. Pendakur. *Student Engagement in Higher Education: Theoretical Perspectives and Practical Approaches for Diverse Populations*. New York, NY: Routledge, 2020.

## Conclusion and Future Work

As stated in the introduction, it seems important to acknowledge that this project and its accompanying report have been liberating. They relay a story that admission and financial aid officers have been telling for many years—that they are often structurally confined from making the changes that they know need to be made to make higher education more accessible and equitable. Some of those constraints are embedded in the society in which we exist, and which admission and financial aid officers—even higher education as a whole—are incapable of solving by themselves. Other constraints are embedded in K-12 education, a system that, while perhaps subject to influence from colleges and universities, operates independently and is subject to forces that are again beyond the reach of higher education alone to solve. It is important to acknowledge these forces as a precursor to examining practices and policies that are within our ability to control.

Therefore, while college admission and financial aid professionals will continue to strive for more equitable practices, the roots of many of the policies and practices that affect equity in college access extend into institutional and governmental leadership. As such, this report has documented a set of recommendations that we hope will spark further exploration, discussion, and

implementation, perhaps yielding yet more ideas and opportunities to improve racial equity. Such work will of necessity continue for many years and should involve stakeholders at all levels.

In 2003, the late Supreme Court Justice Sandra Day O'Connor suggested that higher education's need to consider racial inequities through the admission process was nearing an end.

*“It has been 25 years since Justice Powell first approved the use of race to further an interest in student body diversity in the context of public higher education. Since that time, the number of minority applicants with high grades and test scores has indeed increased. We expect that 25 years from now, the use of racial preferences will no longer be necessary to further the interest approved today.”<sup>72</sup>*

The events of 2020, which offered a glimpse into the depth and breadth of individual and systemic racism in the United States, suggests that while we have made enrollment gains among Black students, we are **nowhere near a time** in which consideration of a student's racial experience in this country will no longer be an interest for postsecondary admission. Rather, the work of the students and thought leadership panel that comprised this project suggest that so long as there is racism in the United States,

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<sup>72</sup> *Grutter v. Bollinger* (02-241) 539 U.S. 306 (2003) 288 F.3d 732, Opinion of the Court

time frames are immaterial until we can eradicate the centuries-old, persistent vestiges of racism embedded in policy and practice.

## Opportunity for Future Work

From the perspective of the thought leadership panel, the process of stepping outside of the day-to-day demands of their jobs presented a challenge to thinking differently about equity. As such, this process suggested that creating a space for admission and financial aid professionals, as well as other stakeholders, to discuss policy and practice through an equity lens would be an important component in the long-term success of this work.

As a thought leadership panel participant indicated, it is often difficult to think in terms outside of the system when working in the daily milieu within the system itself:

*“I was pointing out that I was concerned about the structural racism inherent in our process. And my very diverse team couldn’t see it.”*

– Thought leadership panel participant

From the perspective of the thought leadership panel, the process of stepping outside of the day-to-day demands of their jobs presented a challenge to thinking differently about equity.









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