CENTER ON POVERTY and INEQUALITY
GEORGETOWN LAW

ECONOMIC SECURITY and
OPPORTUNITY INITIATIVE

Obstacles to Opportunity

Increasing College Success by Understanding & Addressing Older Students' Costs Beyond Tuition

VINCENT PALACIOS, CASEY GOLDVALE,
CHRIS GEARY, & LAURA TATUM

APRIL 2021

Georgetown Center on Poverty and Inequality

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Contents

Abbreviations, Acronyms, & Initializations

ASAP—Accelerated Study in Associate Programs

AY—Academic Year

CAA—Consolidated Appropriations Act, 2021

CE—Consumer Expenditure Surveys

CCAMPIS—Child Care Access Means Parents in School

CCDBG—Child Care and Development Block Grant

CCDF—Child Care and Development Fund

CHAP—College Housing Assistance Program

COA—Cost of Attendance

CPI—Consumer Price Index

CPI-U—Consumer Price Index for All Urban Consumers

CU—Consumer Unit

CUNY—City University of New York

CY—Calendar Year

ED—U.S. Department of Education

EFC—Expected Family Contribution

ESOI—Economic Security and Opportunity Initiative

FAFSA—Free Application for Federal Student Aid

FWS—Federal Work-Study

GAO—Government Accountability Office

GCPI—Georgetown Center on Poverty and Inequality

GPA—Grade Point Average

HEA—Higher Education Act of 1965

HHS—U.S. Department of Health and Human Services

HUD—U.S. Department of Housing and Urban Development

IRS—Internal Revenue Service

NCES—National Center for Education Statistics

NPSAS—National Postsecondary Student Aid Study

NSLP—National School Lunch Program

OPM—Official Poverty Measure

SAI—Student Aid Index

SNAP—Supplemental Nutrition Assistance Program

SPOC—Single Point of Contact

TANF—Temporary Assistance for Needy Families

TCC—Tacoma Community College

THA—Tacoma Housing Authority

USDA—U.S. Department of Agriculture

WIC—Special Supplemental Nutrition Program for Women, Infants, and Children

Executive Summary

Higher education offers millions of people[i] the opportunity to improve their economic security through increased competitiveness for higher-paying jobs[ii, iii, iv, v] and improved lifelong well-being and health outcomes.[vi, vii, viii] Higher education can also represent an important opportunity to address economic inequality[ix, x] by reducing the share of people in low-paid work and increasing median pay without increasing top

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i Fain, Paul. "Cautious Interest in College Among Working Adults." Inside Higher Ed, 2020. Available at https://www.insidehighered.com/news/2020/09/17/working-adults-increasingly-interested-postsecondary-education-more-skeptical-about .

ii Manyika, James, et al. "Jobs lost, jobs gained: What the future of work will mean for jobs, skills, and wages." McKinsey Global Institute, 28 November 2017. Available at https://www.mckinsey.com/featured-insights/future-of-work/jobs-lost-jobs-gained-what-the-future-of-work-will-mean-for-jobs-skills-and-wages#.

iii Carnevale, Anthony P., Nicole Smith, and Jeff Strohl. "Recovery: Job Growth and Education Requirements Through 2020," Georgetown University Center on Education and the Workforce, June 2013. Available at https://cew.georgetown.edu/cew-reports/recovery-job-growth-and-education-requirements-through-2020/.

iv Autor, David. "Skills, Education, and the Rise of Earnings Inequality Among the 'Other 99 Percent.'" Science, 344(6186):843-851, 23 May 2014. Available at https://seii.mit.edu/research/study/skills-education-and-the-rise-of-earnings-inequality-among-the-other-99-percent/.

v Dvorkin, Maximiliano, and Hannah Shell. "The Growing Skill Divide in the U.S. Labor Market." Federal Reserve Bank of St. Louis: On the Economy Blog, 18 May 2017. Available at https://www.stlouisfed.org/on-the-economy/2017/may/growing-skill-divide-us-labor-market.

vi Carnevale, et al. "The College Payoff: Education, Occupations, Lifetime Earnings." The Georgetown University Center on Education and The Workforce, 2011. Available at https://cew.georgetown.edu/cew-reports/the-college-payoff/.

vii Hershbein, Brad, and Melissa S. Kearney. "Major Decisions: What Graduates Earn Over Their Lifetimes." The Hamilton Project, 29 September 2014. Available at https://www.hamiltonproject.org/blog/major_decisions_what_graduates_earn_over_their_lifetimes.

viii Oreopoulos, Phillip, and Kjell G. Salvanes. "Priceless: The Nonpecuniary Benefits of Schooling." Journal of Economic Perspectives, 25(1): 159-184, Winter 2011. Available at https://pubs.aeaweb.org/doi/pdfplus/10.1257/jep.25.1.159.

ix Hershbein, Brad, Melissa Schettini Kearney, and Luke W. Pardue. "College Attainment, Income Inequality, and Economic Security: A Simulation Exercise. Working Paper 26747." National Bureau of Economic Research, February 2020. Available at http://www.nber.org/papers/w26747.

x Hershbein, Brad, Melissa S. Kearney, and Lawrence H. Summers. "Increasing education: What it will and will not do for earnings and earnings inequality." Brookings, 31 March 2015. Available at https://www.brookings.edu/blog/up-front/2015/03/31/increasing-education-what-it-will-and-will-not-do-for-earnings-and-earnings-inequality/.

incomes.[xi,xii] Yet, higher education can also saddle people with insurmountable debt that can threaten their future economic well-being,[xiii] and often perpetuates, rather than disrupts, racial, gender, and socioeconomic inequities. These inequities persist in college access,[xiv] graduation rates,[xv] and labor market outcomes.[xvi] The benefits of higher education have been disproportionately concentrated among white people[xvii] at the expense of Black, Latinx, and American Indian people.[xviii] In particular, adults 25 and older—a group disproportionately comprised of people of color, women, and people with low incomes—face significant barriers to college degree attainment.[xix]

The real cost of college for students[xx] is higher than commonly understood.[xxi, xxii] Tuition costs, which have risen rapidly during the past three decades, tend to drive much of the debate about college affordability. However, living costs for students—such as housing, food, and transportation—are far more dominant components of the cost of attending college.[xxiii] For older students, average annual costs beyond tuition are nearly three times larger than the average annual cost of in-state tuition at public four-year colleges, and more than eight times larger than the average annual tuition for public two-year colleges.[xxiv] Understanding and addressing costs beyond tuition is essential to ensuring college is affordable for all students.

We Need a New Approach To Measuring Costs Beyond Tuition

Colleges' calculations of the total "cost of attendance" (COA), often underestimate many students' true living costs—particularly for older students (defined in this report as students ages 25 through 45). This underestimation can reduce the financial aid made available to students;[xxv] influence students' school selection;[xxvi] and decrease their overall likelihood of educational success.[xxvii]

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xi Greenstone, Michael, et al. "Thirteen Economic Facts about Social Mobility and the Role of Education." The Hamilton Project (Brookings), June 2013. https://www.brookings.edu/wp-content/uploads/2016/06/THP_13EconFacts_FINAL.pdf.

xii Chetty, Raj, et al. "Is the United States Still a Land of Opportunity? Recent Trends in Intergenerational Mobility." The American Economic Review, 104(5):141-147, 2014. Available at https://pubs-aeaweb-org.proxy.library.georgetown.edu/doi/pdfplus/10.1257/aer.104.5.141.

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xv "Indicator 23: Postsecondary Graduation Rates." National Center for Education Statistics, February 2019. Available at https://nces.ed.gov/programs/raceindicators/indicator_red.asp.

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xvii "Educational Attainment, by Race and Ethnicity." American Council on Higher Education, 2017. Available at https://www.equityinhighered.org/indicators/u-s-population-trends-and-educational-attainment/educational-attainment-by-race-and-ethnicity/.

xviii Taylor, Morgan, et al. "Race and Ethnicity in Higher Education: 2020 Supplement." The American Council on Education, 2020. Available at https://www.equityinhighered.org/resources/report-downloads/race-and-ethnicity-in-higher-education-2020-supplement/

xix GCPI ESOI analysis of 2016 National Postsecondary Student Aid Study (NPSAS).

xx Goldrick-Rab, Sara, and Nancy Kendall. "The Real Price of College." The Century Foundation, 3 March 2016. Available at https://tcf.org/content/report/the-real-price-of-college/.

xxi Our categories of costs beyond tuition are largely consistent with the categories of indirect expenses discussed in the following report: Coles, Ann, Laura Keane, and Brendan Williams. "Beyond the College Bill: The Hidden Hurdles of Indirect Expenses." uAspire, June 2020. Available at https://www.uaspire.org/BlankSite/media/uaspire/Beyond-the-College-Bill.pdf.

xxii Flores, Antoinette. "Don't Make These Common Higher Education Mistakes." Center for American Progress, 13 July 2015. Available at https://www.americanprogress.org/issues/education-postsecondary/news/2015/07/13/117188/dont-make-these-common-higher-education-mistakes/.

xxiii Dancy, Kim, and Rachel Fishman. "More Than Tuition: What Is Cost of Attendance?" New America, 3 May 2016. Available at https://www.newamerica.org/education-policy/edcentral/more-than-tuition-1/.

xxiv "Trends in College Pricing 2019." College Board, 2019. Available at https://research.collegeboard.org/pdf/trends-college-pricing-2019-full-report.pdf.

xxv "About the 'Understanding Your Financial Aid Offer' Tool." Consumer Financial Protection Bureau. Available at https://www.consumerfinance.gov/paying-for-college2/understanding-your-financial-aid-offer/offer/test/.

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UNDERSTANDING & ADDRESSING costs beyond tuition **IS ESSENTIAL** to ensuring college is **AFFORDABLE FOR ALL STUDENTS.**

To develop a new approach to measuring costs beyond tuition that better reflect the needs of older students, this report offers a new quantitative analysis of costs beyond tuition. This analysis assesses living costs of the average older student by analyzing data from the Consumer Expenditure (CE) surveys.[xxviii] In doing so, this report estimates the actual spending habits of older students and analyzes differences along a number of student characteristics, including by race and ethnicity, sex, and family composition.

This report finds that on average, older students spend about $30,900 per year on costs beyond tuition. This is a substantial economic consideration that may prevent many older students from completing their degrees. Further, this costs-beyond-tuition estimate is larger than many colleges' COA estimates. This discrepancy suggests the need to craft a new approach that measures the actual expenditures, and experiences, of older students.

Report Structure

This report first outlines the importance of accurately assessing older students' costs beyond tuition, then explains the quantitative methods underlying this analysis, articulates how costs beyond tuition can negatively impact older students' well-being, and illustrates how financial aid and public benefits systems fail to adequately support older students. Lastly, this report recommends how to reduce older students' spending on costs beyond tuition, increase grant and work study resources for older students, facilitate older students' access to financial aid and public benefits, and measure costs beyond tuition accurately and inclusively.

Specifically:

- Section I ("Introduction") introduces the importance of college affordability and costs beyond tuition for older students,
- Section II ("Measuring Costs Beyond Tuition Requires a New Approach") outlines the quantitative methods of this analysis,
- Section III ("The Weight of Older Students' Costs Beyond Tuition Can Undermine College Affordability & Completion") identifies the magnitude of costs beyond tuition and explains how these expenses can negatively impact older students' educational and economic outcomes,
- Section IV ("For Older Students, Financial Aid & Public Benefits Can be Inadequate & Conflicting") articulates how the financial aid and public benefits systems fail to adequately meet the economic needs of older students, and
- Section V ("Recommendations") presents a series of recommendations for federal, state, local, and college policymakers and practitioners to adequately meet the needs of older students, particularly those with low incomes.

xxviii All new costs-beyond-tuition estimates presented in this report use 2020 dollars and five years (2014-2018) of pooled Consumer Expenditure Surveys data, unless otherwise stated.

Summary of Recommendations

This report outlines a set of overarching recommendations that federal, state, local, and college policymakers and practitioners can implement to address costs beyond tuition, support older students' needs, and improve college access and success. These recommendations interweave analysis of higher education financial aid and public benefits—and the intersection between the two—to offer innovative recommendations that center the unique needs of older students. These solutions focus on providing students with more generous, effective resources and improving governmental and institutional accountability. In turn, these suggestions would help reduce racial, gender, and socioeconomic inequities in college affordability, completion, and economic outcomes.

Recommendations are organized in the following four categories:

1. **Reduce Out-of-Pocket Spending on Costs Beyond Tuition for Older Students:** Federal, state, and local policymakers—and colleges—should reduce students' costs beyond tuition by increasing programs and benefits that alleviate student expenses in areas like housing, food, transportation, and child care.

2. **Increase Grant & Work Study Resources for Older Students' Costs Beyond Tuition:** Policymakers should increase grant and work study resources to improve older students' degree attainment and post-college earnings—an investment which experts estimate could more than pay for itself through future tax revenue.[xxix, xxx]

3. **Facilitate More Older Students' Access to Existing Financial Aid & Public Benefits Resources:** Policymakers and college administrators should change financial aid and public benefit policies to better meet the unique needs of older students. They can do this by making financial aid more responsive to the needs of part-time students and those who attend college over long durations, by ensuring older students can be eligible for public benefit programs, and by better connecting students to supports for which they are eligible.

4. **Measure Costs Beyond Tuition Accurately & Inclusively:** To provide adequate financial aid and public benefits support, the federal government must ensure estimates of students' living expenses are accurate and designed to capture older students' financial needs and responsibilities.

If our nation is to significantly improve outcomes for older students, policymakers and other stakeholders must ensure a baseline standard of living for them and their families. Taken together, our analysis and findings suggest that these goals can be realized if institutions and all levels of government play a role in structuring, funding, and administering services and cash and in-kind supports to reduce older students' costs beyond tuition.

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I. Introduction

Higher education offers millions of people[1] the opportunity to improve their economic security through increased competitiveness for higher-paying jobs[2, 3, 4, 5] that lead to increased earnings[6] and improved lifelong well-being and health outcomes.[7, 8, 9] Higher education can also represent an important opportunity to address economic inequality[10, 11] by reducing the share of people in low-paid work and increasing median pay without increasing top incomes.[12, 13] Yet, higher education can also saddle people with insurmountable debt that can limit their future earnings,[14] and often perpetuates, rather than disrupts, racial, ethnic, gender, and socioeconomic inequities.[15, 16, 17, 18, 19] These inequities persist in college access,[20] graduation rates,[21] and labor market outcomes.[22] The benefits of higher education are disproportionately concentrated among white people[23] at the expense of Black, Latinx, and American Indian people.[24] In particular, adults 25 and older—a group disproportionately composed of people of color, women, and people with low incomes and who make up nearly a third of all college students[25]—face significant barriers to college degree attainment.[26] (Note: While this report examines challenges older students face to college degree attainment, this focus does not imply that younger students do not face similar challenges or are otherwise not struggling).

In part because older students are often economically disadvantaged—63 percent have low incomes[27]—and represent a sizeable share[28] of the overall college student population, ensuring college affordability for older students can contribute to closing significant inequities in college completion rates by race and income level.[29] High pricing, inadequate and complex financial aid, high non-tuition costs,[30, 31] limited time to balance employment and caregiving responsibilities,[32, 33] and high average debt burdens associated with U.S. higher education deter many people—especially many people of color and people with lower incomes[34]—from attending *and* completing college.[35, 36] Making college attendance more affordable could help shrink these obstacles.

The COVID-19 pandemic and related recession have further amplified these longstanding challenges, including disparities by race and income. Students who already face significant structural barriers to college—including Black or brown students, single mothers, older students, and people with low incomes—are among those who have also most suffered financially during the COVID-19-induced recession.[37, 38, 39] Indeed, the pandemic has reshaped the higher education landscape, and many students with lower incomes and students of color are deferring postsecondary education or leaving college entirely for financial reasons.[40, 41] Without substantial interventions to address students' overall costs of attending college, educational opportunity gaps by race and income will likely widen further.

College Costs Beyond Tuition Help Determine Affordability & Are Particularly Problematic for Older Students

The real cost of college for students is higher than commonly understood.[42, 43] Tuition costs, which have risen rapidly during the past three decades, tend to drive much of the debate about college affordability. However, living costs for students—such as housing, food, and transportation—are often far more dominant components of the cost of attending college.[44] Older students' average annual costs beyond tuition are nearly three times larger than the average annual cost of in-state tuition at public four-year colleges, and more than eight times larger than the average annual tuition for a public two-year college.[45] Understanding and addressing these costs is essential to ensuring college is affordable for all students.

UNDERESTIMATING THE COA can REDUCE THE FINANCIAL AID made available to students, cause them to attend schools they might otherwise not want to attend, & DECREASE their overall likelihood for EDUCATIONAL SUCCESS.

Unfortunately, colleges' calculations of the total "cost of attendance" (COA), including allowable living expenses,[46] often underestimate many students' true living costs—particularly for older students (defined in this report as students ages 25 through 45). Underestimating the COA can reduce the financial aid made available to students,[47] cause them to attend schools they might otherwise not want to attend,[48] and decrease their overall likelihood for educational success.[49]

Recent findings of students' high rates of basic needs insecurity have helped many higher education policymakers,[50] from campuses to Congress, understand and better address college students' struggles to afford costs beyond tuition.[51] Though the topic is receiving more attention, limited research has quantified student spending on living costs, particularly in ways that illuminate the diversity of student backgrounds and needs.[52, 53]

This report focuses on older students, who face distinct barriers that remain underappreciated by higher education institutions and by society at large.[54, 55] Older students frequently balance parenting and paid employment with their studies and experience high rates of poverty.[56] Older students face even higher risks of housing instability and food insecurity than the overall college student population.[57] They are also more likely than younger students to attend school part-time and generally require more time to complete college.[58] A longer period of time to complete a degree is not problematic on its own but may increase living and opportunity costs for older students, especially those who attend school part-time.[59, 60]

This report argues that older students face costs beyond tuition that undermine their financial stability, in turn increasing their risk of non-completion. Focusing on older students' costs beyond tuition also expands the nation's higher education narrative to better acknowledge the experiences of independent students[61]—who comprised nearly 50 percent of all undergraduates in 2016[62]—as the Higher Education Act of 1965 (HEA) categorizes all older students as independent. Improving outcomes for older students is essential for ensuring equitable access to quality education which would, in turn, advance economic equity.

A New Approach for Quantifying Older Students' Costs Beyond Tuition

To improve our understanding of how costs beyond tuition affect older students, the Georgetown Center on Poverty & Inequality's (GCPI) Economic Security & Opportunity Initiative (ESOI) offers a new analysis of costs beyond tuition. The analysis aims to validate and expand upon groundbreaking work on costs beyond tuition from leading organizations—including the Hope Center for College, Community, and Justice;[63] New America;[64] uAspire;[65] the Institute for Women's Policy Research;[66] The Century Foundation;[67] and The Institute for College Access & Success[68] among others—to inspire and inform effective college affordability and economic security policies that improve college completion rates among marginalized groups.

This report first briefly discusses the limitations of current methods used to estimate costs beyond tuition and the added benefits of a new methodology. Next, we detail the wide-ranging costs beyond tuition that students can face when they attend college. We find that these costs dominate budgets for older students—as these costs are more than three times larger than average annual tuition costs at public four-year colleges—and that current financial aid structures, even when combined with public benefits, leave students with thousands of dollars in unmet need.[69] Finally, we propose federal, state, local, and institutional recommendations to ensure that older students—particularly students of color, students with low incomes, and student parents, who are disproportionately women—can better afford their expenses while attending college.

II. Measuring Costs Beyond Tuition Requires a New Approach

Providing students accurate and transparent estimates of their living expenses is key to empowering them to succeed in postsecondary education.[70] Living expenses plus tuition, fees, and course materials compose the total COA.[71] Colleges should provide students a clear picture of students' total costs so they can properly plan for, finance, and complete their education. In providing accurate assessments of students' total costs, colleges and governments can better target aid to students with the greatest financial barriers to receiving a degree. The COA also sets an upper limit on the amount of federal financial aid students are eligible to receive.[72] Therefore, underestimates of students' living costs can limit the reach and efficacy of policy tools available to college administrators and government officials to bolster college affordability and completion.

Once students are enrolled, their COA estimate transforms from a planning tool to a lived budget, and serious inaccuracies can lead to higher-than-expected costs and significant financial challenges. For students with low incomes who are able to string together enough resources to cover their tuition, fees, and living costs, even one unexpected expense can be the difference between degree completion and leaving college early.[73] Conversely, modest financial and non-financial supports that help manage costs beyond tuition, such as low-interest loans and case management services, improve students with low incomes' grade point averages and completion rates, according to rigorous studies.[74, 75]

This section outlines how current approaches to measuring student living expenses are commonly outdated, inconsistent, and inadequate. It then describes a new approach to measuring students' living expenses—using data from the Consumer Expenditure (CE) surveys—that better reflects their financial responsibilities. It concludes with a brief discussion of the limitations of this approach. (Note: The 2021 omnibus spending bill made several relevant changes to the financial aid system that will be implemented after the publication of this report. This includes changes to what can be included in students' COA, increased authority for the U.S. Department of Education (ED) to regulate standards around estimating costs, and other potentially impactful reforms that may alleviate some of the issues this report identifies with COA estimates.[76] Several of these changes are discussed in greater detail in Section V, "Recommendations.")

Current Approaches to Measuring Students' Living Expenses Are Outdated, Inconsistent, & Inadequate

Institutions typically follow longstanding policies and procedures to determine student financial aid eligibility,[77] but these institutional practices rarely adequately reflect the lived experiences of students with nontraditional experience—especially students who are financially responsible for other people.[78] Additionally, researchers have shown that colleges' overly-expansive flexibility to estimate students' COA has led to widely different estimates of costs beyond tuition and fees within the same local geographic areas, which could misleadingly affect the perceived affordability of one college over another.[79]

For **STUDENTS WITH LOW INCOMES** who are able to string together enough resources to cover their tuition, fees, & living costs, even **ONE UNEXPECTED EXPENSE** can be the difference between degree completion & **LEAVING COLLEGE EARLY**.

While colleges have overly-expansive flexibility to estimate students' COA, under the HEA, the federal government sets restrictive boundaries for the allowable living expenses included in the COA. The HEA outlines categories of expenses which may be included in living expenses, as well as a limited list of exceptions, such as allowing for the professional judgment of financial aid administrators at higher education institutions.[80, 81] Federal guidance instructs institutions to include only those expenses in student budgets in the COA that are explicitly mentioned under allowable categories or the limited list of exceptions.[82] Further, allowable living expenses in the COA typically only include living expenses for students themselves, unlike other measures of an adequate living standard that look at all the needs of family members who live together.[83]

Though the HEA goes to great lengths to define categories of allowable living expenses, it offers less guidance on how institutions should estimate these costs, which gives colleges substantial discretion to estimate off-campus living costs.[84, 85] Federal rules stipulate that colleges *may* estimate costs differently for separate groups of students, based on their housing arrangements, but should use the same estimate for students within the same group.[86] However, the federal government defines student groups by on- or off-campus living status. For example, the ED's Federal Student Aid Office instructs institutions to estimate the cost of housing (or "room") at one level for on-campus students, another for off-campus students living with their parents, and a third for financially independent students who live on their own.[87] However, schools can increase the COA for students for costs like dependent care or disability services, and students can request changes in their COA calculations through the professional judgment process.[88]

Unfortunately, these institution-reported estimates of living costs are methodologically inconsistent due to varying institutional choices, including those reflecting intentional and unintentional bias.[89] Researchers have demonstrated the inadequacy of some institutions' allowable living expense estimates by comparing institution-reported estimates to their own county-level estimates of living expenses.[90] Specifically, research suggests that more than 20 percent of colleges calculated allowable living expenses at least 20 percent lower than estimated county-level living expenses using a consistent approach.[91] Further illustrating the wide range of some institutional living cost estimates, Miami Dade College in Miami, Florida, calculates off-campus housing costs that are more than three times greater than Miami International University of Art and Design, a for-profit arts college less than one mile away.[92] Even allowing for large fluctuations in local housing markets and differing student bodies, it seems unlikely that these differences reflect actual differences in housing costs between the two institutions.

A New Approach to Measure Students' Costs Beyond Tuition

To better address older students' needs, researchers, higher education institutions, policymakers, philanthropic organizations, and other actors need rigorous estimates to better understand costs beyond tuition. This report presents original quantitative analysis of older students' spending on costs beyond tuition. This analysis assesses living costs of the average older student by analyzing household data from the CE surveys.[93] Student data from the National Postsecondary Student Aid Study (NPSAS) are also provided as a comparison and for validation of our novel CE analysis. The CE is the primary data source for this analysis because the CE is designed to measure consumption expenditure and provide data that reflect older students' lived experiences and real spending habits, while NPSAS student budget data are institution-reported and likely based on potentially flawed institutional COA measures (with additional judgment and lack of precision built into part-time student budget data.)

This report focuses on costs beyond tuition for older students, but this method could also be used to analyze independent younger students' costs beyond tuition.

THIS COSTS-BEYOND-TUITION FRAMEWORK CONSIDERS COMPLEXITIES OF OLDER STUDENTS' FINANCIAL EXPERIENCES

This costs-beyond-tuition framework is designed to quantify the resources older students currently spend to afford the major components of a modest but adequate living standard, for themselves and their families, that are necessary to meaningfully engage as a student and complete a degree. Household-level data are adjusted to a per-student basis using an equivalence scale that accounts for other adults present in the older students' household.[94]

Using scaled household-level data from the CE, we measure older students' costs beyond tuition by identifying their average expenses in categories typically included in colleges' estimates of a student's modest but adequate living costs. (Note: Dollar figures from our CE analyses that refer to older students' spending reflect their household spending per adult.) The CE is the leading national source of consumer expenditure data in the United States. The ongoing survey results in a nationally representative dataset that contains information pertaining to hundreds of types of expenditures, as well as demographic and other information about members of each surveyed household.[95] These data are largely self-reported—in our sample, by older students (or their spouses)—and subject to rigorous quality control and evaluation by the Bureau of Labor Statistics.[96]

This analysis is intended to contribute to efforts to address basic needs insecurity and costs beyond tuition. This approach extends existing research that uses the CE to estimate living expenses of "traditional age" students.[97] Other experts and stakeholders have used the CE to provide a point of comparison for institutions to reference when creating their own estimates[98] or to evaluate inconsistencies in estimated living costs within the same local areas.[99]

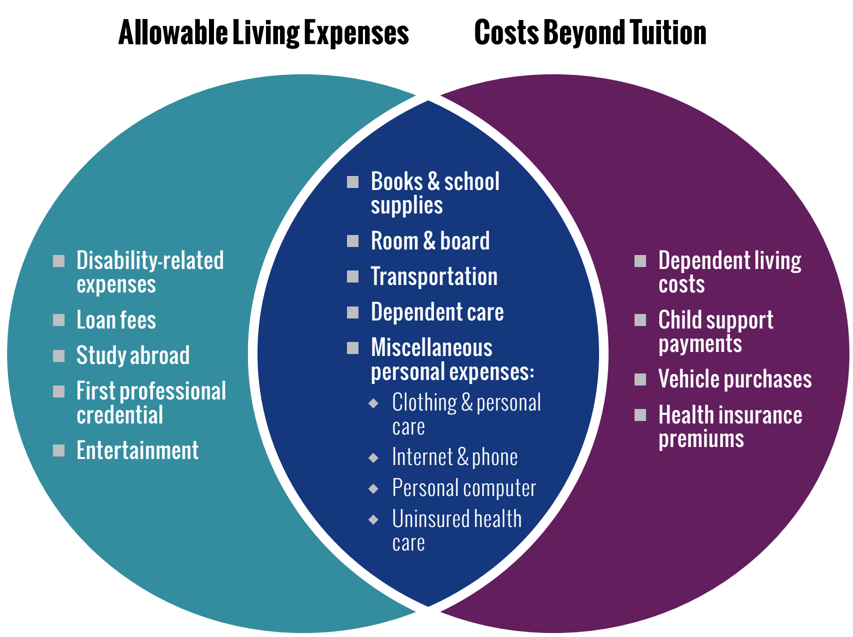
To comprehensively document costs beyond tuition, cost categories included in this analysis are based on costs typically included in the COA framework, supplemented by costs widely used by academic, government, student, and practitioner experts when measuring an adequate standard of living.[100, 101, 102] Selected spending categories include housing, food, transportation, dependent care, health care, clothing and personal care, and internet, technology, and educational materials.

In terms of cost categories, this costs-beyond-tuition analysis differs from federal allowable living expenses in several ways. To accurately reflect older students' financial responsibilities, this analysis includes expenses in a few categories that the current federal allowable living expenses often omit or fail to fully include, such as dependent living costs, child support, vehicle purchases, and health insurance premiums. (See further explanation in the accompanying methodology note). This analysis excludes a few categories of allowable living expenses that are difficult or impossible to adequately measure with CE data, such as disability-related expenses, which warrant further investigation. Additionally, institutions can include a modest allowance for entertainment expenses, but they are excluded from costs beyond tuition in this analysis because this amount is arguably outside the scope of essential living costs and is often relatively small. This exclusion does not imply that students should not have an entertainment allowance.

Figure 1 demonstrates the differences in allowable living expenses and costs beyond tuition. These differences are further explained in the accompanying methodology note.

FIGURE 1. Costs Beyond Tuition Include Necessary Living Costs for Students & Dependents

Comparison of Key Allowable Living Expenses Included in the Higher Education Act of 1965 & Expenses Included in Costs Beyond Tuition



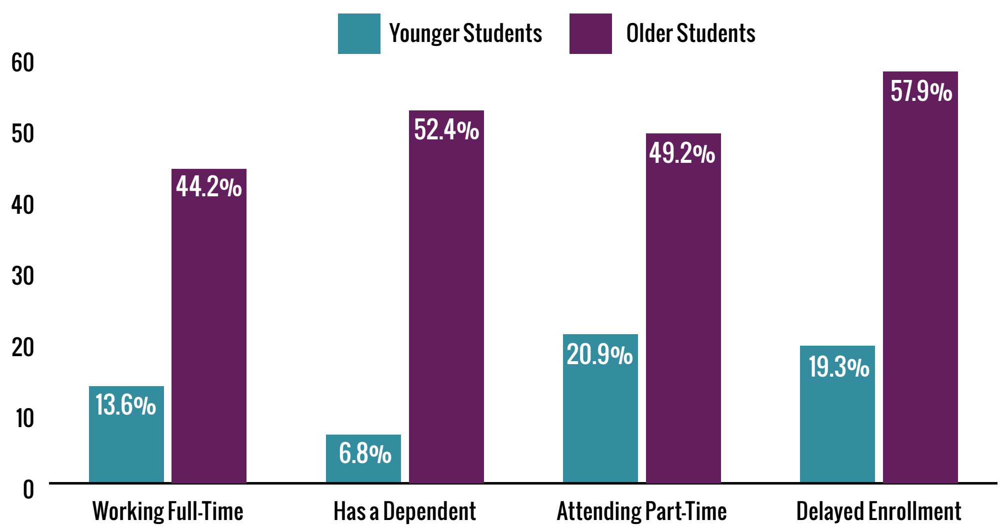
Note: Based on analysis of the Higher Education Act and available data in the Consumer Expenditure Surveys.

Source: Georgetown Center on Poverty and Inequality, 2021.

By developing student-level estimates from household-level expenditures—rather than treating single individuals without children as the default student—we depart from the COA framework, and we acknowledge older students' complex financial responsibilities and resource sharing with their families.[103] (Note: We estimate "consumer unit" level expenses for consumer units with at least one older student and then adjust those figures to be equivalent to one adult, as explained in detail in the accompanying methodology note.) Measures of basic needs and deprivation and related public programs have generally considered families (or households) the relevant unit rather than individuals.[104] This approach is particularly important for older students because six out of every ten (60.8 percent) older students have a dependent child, married partner, or both, compared to only one in ten (9.8 percent) younger students.[105] Figure 2 demonstrates that many older students balance family and work demands in addition to college.

FIGURE 2. Older Students Often Delay Enrollment & Balance Demands of Family & Work with College Attendance

Incidence of Selected Risk Factors to College Completion by Age Group, AY 2015–2016



Note: Based on analysis of National Center for Education Statistics (NCES) National Postsecondary Student Aid (NPSAS) data. Risk factors are determined and published by the U.S. Department of Education. The sample has been limited to undergraduate students attending Title IV postsecondary institutions; not enrolled in colleges in Puerto Rico; those who have not previously obtained a four-year, graduate, or professional degree; and those enrolled in a two- or four-year degree program. Younger students are less than 25 years old; older students are ages 25-45. AY stands for academic year. Delayed enrollment refers to starting college more than one year after completing high school.

Source: Georgetown Center on Poverty and Inequality, 2021.

Our approach utilizes household-reported data. These data stand in contrast to the student budget estimates—almost entirely institution-reported—made available in the NPSAS[106] and elsewhere, which are subject to varied institutional assumptions about their students' spending patterns by group and determined without consistent methods across institutions, as discussed in the previous section.

LIMITATIONS OF THIS COSTS-BEYOND-TUITION ANALYSIS

Our quantitative analysis of older students' actual expenditures on costs beyond tuition comes with its own limitations. First, some expenditures will be based on choices made due to constrained budgets. In our sample, older students with higher incomes spend more on costs beyond tuition than older students with low incomes. This suggests that our estimates likely are influenced by ability to pay, and do not solely reflect need.

Furthermore, the CE measures only out-of-pocket expenditures, meaning that payments made from a third party on behalf of the household—such as on-campus housing payments made through student loans—are not possible to include. As a result, students living in student housing operated by colleges or universities have been excluded (which corresponds to about one percent of our sample). However, we attempt to corroborate or caveat observations and recommendations with others' research and analyses.

Due to sample size challenges and lack of information about some attendance and personal characteristics, we were not able to fully disaggregate our costs beyond tuition estimates, which may obscure important differences in student need. In particular, we were not able to disaggregate costs beyond tuition for American Indian and Alaska Native or Native Hawaiian and other Pacific Islander students. Insufficient sample size for these students led to wide margins of error too large to permit meaningful group expenditure estimates.

Additionally, the CE does not provide nuanced information about college attendance intensity. We could identify whether a student attends college part-time or full-time, but we could not measure the duration a student attended college nor the credit hours they took within a given semester. The CE is also unable to differentiate college attendance by sector (two-year or four-year public, private nonprofit, or for-profit institutions).

The CE does not provide data necessary to identify students as people with disabilities, LGBTQ+, immigrants, former foster youth, or first-generation students, which prevented us from analyzing costs beyond tuition for students with these identities. Further, the CE only includes residents of the 50 U.S. states and the District of Columbia, leaving out students living in Puerto Rico and other parts of the United States.

III. The Weight of Older Students' Costs Beyond Tuition Can Undermine College Affordability & Completion

This section presents original quantitative analysis of older students' average spending on costs beyond tuition. After outlining the main drivers of these costs, it illustrates how older students' costs beyond tuition can affect college completion. The section concludes by discussing the ways in which costs beyond tuition differ by student characteristics, such as race, ethnicity, and gender, and other identities and lived experiences such as being caregivers and parents ("parents" refers to parents with dependent children throughout this report).

Costs Beyond Tuition Are Major Expenses for Older Students

Older students' costs beyond tuition are far larger than both the average cost of tuition and available federal grant-based student aid. More than 80 percent of older students' costs beyond tuition go towards housing, transportation, and food expenditures.[107] Housing expenditures alone make up more than 40 percent of older students' total costs beyond tuition (a topic we discuss in more detail in our publication "Driving Home Costs Beyond Tuition: A New Look at Older Students' Challenges Affording Housing").[108] Dependent care expenditures—including child care and adult care—can be a significant component of older students' costs beyond tuition. Cost beyond tuition estimates presented throughout this section come from GCPI ESOI analysis of CE surveys data.

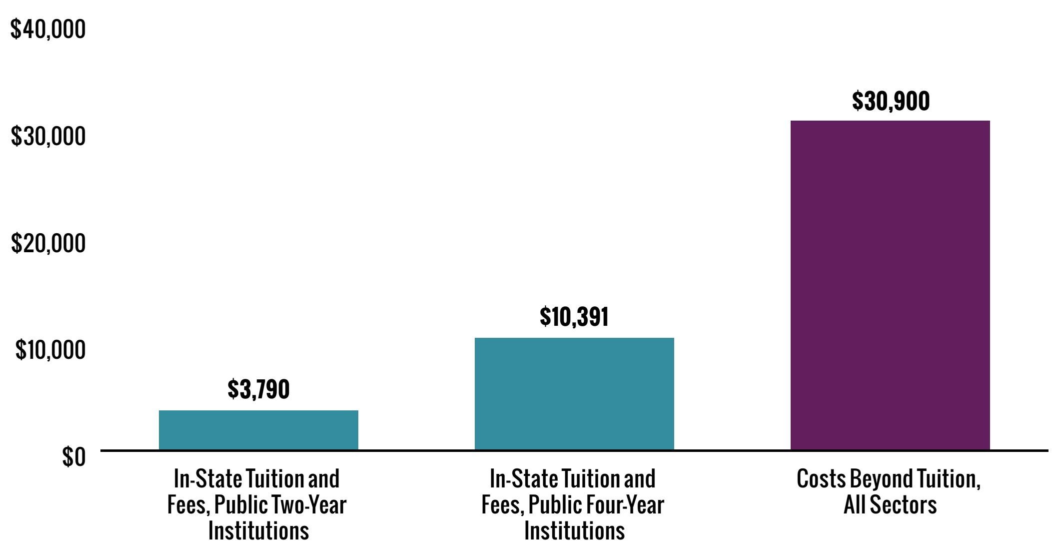
COSTS BEYOND TUITION OUTSTRIP TUITION & FEDERAL GRANT-BASED AID

More than **80 PERCENT** of older students' costs beyond tuition go towards **HOUSING, TRANSPORTATION**, and **FOOD** expenditures.

Though the cost of tuition (and fees) is already prohibitive for many older students,[109] costs *beyond* tuition are typically far more substantial. At about $30,900 per year, older students' average costs-beyond-tuition expenditures are almost three times larger than the average in-state tuition at a public four-year college[110] and just over eight times larger than the average tuition of a public two-year college.[111] (See "Family Composition & Structural Racial & Gender-Based Disparities Affect Older Students' Experiences with Costs Beyond Tuition" subsection for more information on how these costs differ based on family structure, race, and gender.) Figure 3 compares average costs beyond tuition to average, full-time in-state tuition, at both two- and four-year public colleges.

FIGURE 3. Costs Beyond Tuition Far Surpass Average In-State Tuition for Older Students

Average In-State Tuition, by Institution Type, AY 2016, and Average Annual Costs Beyond Tuition for Older Students, CY 2014-2018



Note: Because 2016 National Postsecondary Student Aid (NPSAS) data indicate that most older students attend in-state institutions, average in-state tuition figures are shown. Tuition data come from the 2016 "Trends in College Pricing" report from the College Board and reflect the average published tuition and fees from the 2015-16 academic year, and are adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U). These average tuition and fees figures are similar to the average in-state tuition figures for 2020-21, which were $3,770 for public two-year institutions, and $10,560 for public four-year institutions.

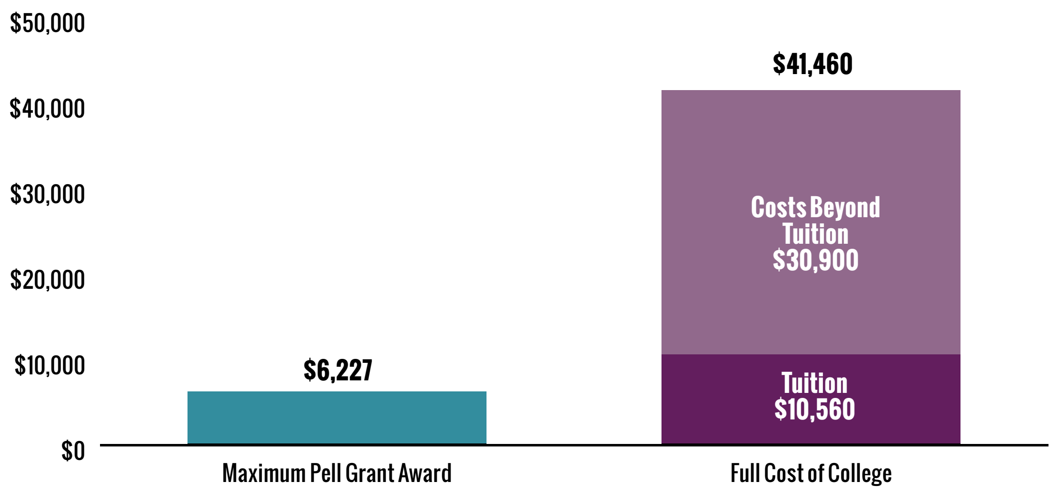
Costs beyond tuition are based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, are adjusted to 2020 dollars using the CPI-U, and are rounded to the nearest hundred. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

Source: Georgetown Center on Poverty and Inequality, 2021.

The average older student's full cost of college far surpasses federal grant-based student aid available. For example, the full cost of college for the average older student paying in-state tuition at a public four-year college is nearly seven times the maximum Pell Grant[112] (see Figure 4). (Note: Pell Grants make up 93 percent of federal-grant-based aid per year.)[113] The current federal aid system fails to adequately address costs beyond tuition for older students, as discussed in Section IV, "For Older Students, Financial Aid & Public Benefits Can Be Inadequate & Conflict."

FIGURE 4. The Full Cost of College Far Surpasses the Maximum Pell Grant Award for Older Students

Maximum Pell Grant Award, AY 2016, and the Average Annual Full Cost of College for Older Students at In-State Public Four-Year Colleges, CY 2014-2018



Note: The Maximum Pell Grant Award represents the 2016 award year amount adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U). AY stands for academic year.

The full cost of college for the average older student combines average in-state tuition and fees at public four-year colleges with average costs beyond tuition. Tuition data are based on analysis from the 2020 "Trends in College Pricing and Student Aid" report from College Board. Average in-state tuition is shown as most older students attend in-state institutions based on analysis of 2016 National Center for Education Statistics (NCES) National Postsecondary Student Aid (NPSAS) data.

Costs beyond tuition are based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, are adjusted to 2020 dollars using the CPI-U, and are rounded to the nearest hundred. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

Source: Georgetown Center on Poverty and Inequality, 2021.

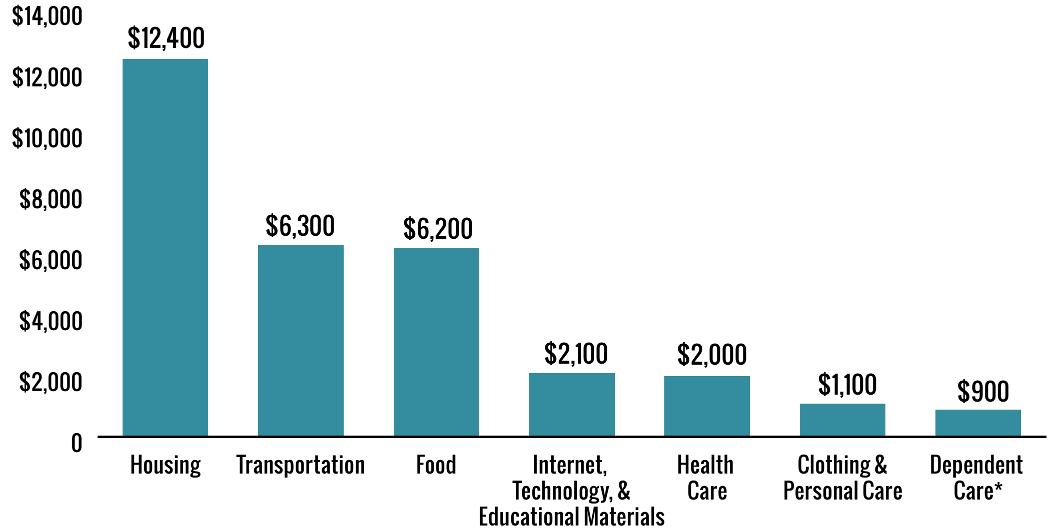
HOUSING, TRANSPORTATION, & FOOD ARE THE LARGEST CONTRIBUTORS TO OLDER STUDENTS' COSTS BEYOND TUITION

Costs beyond tuition include expenditures on housing, food, transportation, health care, dependent care, personal care, and education. Housing, transportation, and food comprise more than 80 percent of older students' cost beyond tuition expenditures.[114]

Of all costs beyond tuition, housing is the single greatest cost that older students face (see Figure 5).[115] Housing expenses—including rent, taxes, insurance, maintenance, utilities, furnishings, and services—constitute over 40 percent of older students' spending on costs beyond tuition on average. Older students spend an average of $12,400 per year on housing expenditures. Rent and mortgage payments make up more than 77 percent of those housing expenditures. The remaining 23 percent are spent on utilities, household services, and furnishings (see Figure 6).[116]

FIGURE 5. Older Students Spend Most on Housing, Transportation, & Food

Average Annual Older Students' Expenditures on Costs Beyond Tuition, by Category, CY 2014–2018



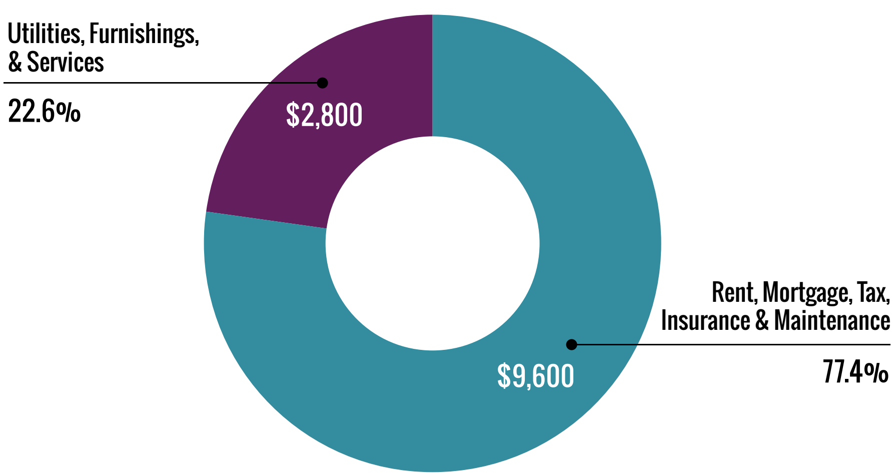
Note: Based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, are adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U), and are rounded to the nearest hundred. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

*For older students with dependents, dependent care is a significant cost. However, unlike other spending categories, many students report no spending on dependent care, which depresses the estimate of average spending on dependent care for older students. Some older students may also receive public supports to help address dependent care, which may reduce their reported out-of-pocket dependent care spending in the CE surveys.

Source: Georgetown Center on Poverty and Inequality, 2021.

FIGURE 6. Rent & Mortgage Payments Make up More Than Three-Fourths of Older Students' Housing Expenditures

Average Annual Older Students' Expenditures on Housing Costs, by Subcategory, CY 2014-2018



Note: Based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, are adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U), and are rounded to the nearest hundred. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

Source: Georgetown Center on Poverty and Inequality, 2021.

Transportation expenditures are also a large driver of costs beyond tuition for older students. More than 20 percent of older students' cost beyond tuition expenditures go toward transportation. On average, older students spend $6,300 per year on transportation. Transportation expenditures include fuel, insurance, vehicle purchases, auto loan payments, maintenance, and public transportation expenses. Older students who work full-time spend about $2,300 more per year on transportation than non-working older students.

Nearly another 20 percent of older students' costs beyond tuition expenditures go towards food, both at and away from home. On average, older students spend about $6,200 per year on food. Older students who work full time spend nearly 50 percent more on food away from home ($1,992) than do non-working students ($1,348)—and the same amount on food at home.

Beyond housing, transportation, and food expenditures, the remaining 20 percent of annual costs beyond tuition for older students include spending on internet, technology, and educational materials, health care, clothing and personal care, and dependent care. On average, older students spend $2,100 per year on internet, technology, and educational materials, $2,000 per year on health care, $1,100 per year on clothing and personal care, and $900 per year on dependent care.

For older students with dependents, dependent care is a significant cost. However, unlike other spending categories, many students report no spending on dependent care, which depresses the estimate of average spending on dependent care for older students. Many older students may also receive public supports to help them afford dependent care, which may reduce their reported out-of-pocket dependent care spending, and dependent care expenditures may fall short of reflecting need for households with limited resources. Dependent care is discussed in detail—along with other ways in which family composition affects older students' experiences with costs beyond tuition—in the subsection "Dependent Care Can Be a Significant Expense for Older Students".

Many Older Students Struggle to Cover Costs Beyond Tuition

Many older students struggle to pay for their costs beyond tuition, forcing them to choose between spending on necessary, interdependent goods,[117] and exposing them to high rates of housing and food insecurity.

MANY OLDER STUDENTS' BUDGETS REQUIRE CHOOSING BETWEEN NECESSARY, INTERDEPENDENT GOODS

Older students facing significant budget constraints struggle to afford necessary, interdependent goods and services. Because these necessary goods and services—like food, housing, child care, and transportation—are also interdependent, struggles to afford any one of them can undermine an older student's ability to meet their other needs.

Categories of costs beyond tuition reflect needs that interact with each other. Housing is essential for storing and preparing food; transportation options determine where students can afford to live, acquire food,[118] access health care,[119] and meet other needs; students who require child care may have increased transportation needs to get to school, work, and care in the same day; maintaining personal care and hygiene is much easier with housing; and personal care, food, and housing all shape health outcomes.[120]

Meeting older students' high housing costs is a baseline for many other basic needs including food security, transportation, and child care. One former older student and higher education policy expert articulated to this report's authors[121] the ways in which housing and food costs intersect:

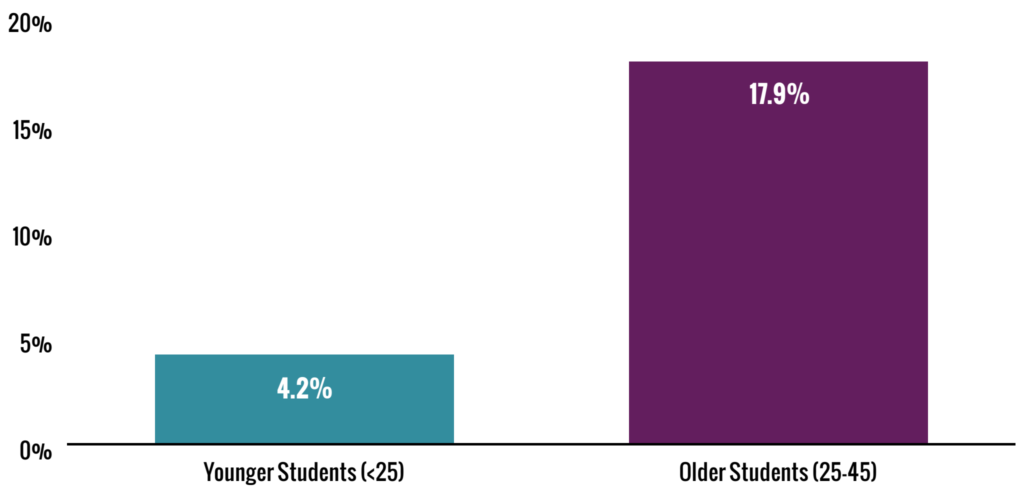
> *"We can't fully address food insecurity if you don't have housing, give someone food but where to store it? We give out meat at the food pantry, but, if you can't put it in a refrigerator, it goes bad—you can't eat it. We can give you a can, but do you have a can opener if you're sleeping in the park? All of this intersects." –Former Older Student*

OLDER STUDENTS FACE HIGH RATES OF HOUSING & FOOD INSECURITY

Many older students struggle with housing costs and face disproportionately high rates of housing insecurity. Figure 7 demonstrates that older students are far more likely to experience or be at risk of homelessness than are younger students. While Figure 7 is based on NPSAS data, which uses a conservative definition of homelessness that likely undercounts true rates of housing insecurity among students, it nevertheless shows how older students face higher rates of housing insecurity than do younger students.

FIGURE 7. Older Students Are at High Risk of Experiencing Homelessness

Percent Distribution of Undergraduate Students Who Are Self-Supporting & at Risk of Homelessness, by Age Group, AY 2015–2016



Notes: Based on analysis of 2016 National Center for Education Statistics (NCES) National Postsecondary Student Aid (NPSAS) data. The sample has been limited to undergraduate students attending Title IV institutions; not enrolled in colleges in Puerto Rico; and those who have not previously obtained a four-year, graduate, or professional degree. Younger students are less than 25 years old; older students are ages 25-45. AY stands for academic year.

Source: Georgetown Center on Poverty and Inequality, 2021.

Older students also face higher rates of food insecurity than younger students, which can jeopardize their physical and mental well-being.[122] A 2017 study found that older students in two-year colleges likely face higher rates of food insecurity than any other group of college students, and that older students likely face higher rates of food insecurity than younger students within two-year colleges, four-year colleges, and vocational programs.[123]

Older Students' Costs Beyond Tuition Can Affect College Completion

Older students' costs beyond tuition can impede their educational performance and path to college completion. Efforts to improve educational outcomes for older students should therefore consider how to better address their costs beyond tuition.

COSTS BEYOND TUITION CONTRIBUTE TO OLDER STUDENTS' CHALLENGING PATH TO COLLEGE COMPLETION

Older students' journeys toward a college degree tend to be long and interrupted. On average, older students who graduated with a four-year degree in 2016 first enrolled in college nearly ten years before.[124] The interrelated challenges of costs and competing responsibilities, combined with the lack of sufficient support from colleges and governments, are important reasons for older students' lengthy college paths.

Older students are more likely than younger students to have competing roles as workers and caregivers, putting them at particularly high risk of college non-completion.[125, 126, 127] Nearly half of older students attend school part-time[128]—often to balance their roles as workers and caregivers—and they are also likelier than younger students to take time off from school, extending the average time older students take to complete a college degree.[129] (On average, younger students earn four-year degrees in 5.3 years at public colleges and 4.8 years at private nonprofit colleges.[130]) This can increase older students' costs to receiving a degree, in part because there is a lifetime limit on Pell Grants that prevents many older students from accessing necessary financial aid.[131]

Longer college paths can also increase student debt, which creates stark long-term financial obstacles (see Section IV "For Older Students, Financial Aid & Public Benefits Can Be Inadequate & Conflict" for more). For the graduating class earning a four-year degree in 2016, total student debt owed by students who started college with no delay[132] from high school averaged $21,500 upon graduation.[133] For students graduating the same year who started college after a delay of more than one year from high school, the average total amount of student debt owed was $25,800. For older students with delayed enrollment, the average total amount of student debt owed was even higher, $30,800.[134]

Costs beyond tuition can threaten older students' well-being[135, 136, 137, 138] and may prevent them from being able to complete their degree.[139, 140, 141] Existing research demonstrates that even relatively smaller costs beyond tuition can be major barriers to pursuing or completing a college education if students do not have adequate funds to address these costs.[142, 143] Many students cannot afford books, other school materials, or food,[144] which can harm their well-being and make it challenging to complete their degree.[145, 146]

PAID EMPLOYMENT TO ADDRESS COSTS BEYOND TUITION REFLECTS RACIAL & GENDER INEQUITIES & CAN THREATEN DEGREE COMPLETION

Paid employment provides an opportunity for older students to afford tuition and costs beyond tuition alike, but also can make full-time attendance and degree completion more challenging. (Paid employment also deeply affects students' ability to access public benefits, as discussed in the subsection "The Public Benefits System is Ill-Designed to Serve Students" in Section IV.) Most older students work at least 20 hours per week,[147] and 43 percent are employed full time.[148] Older students who work full-time spend more on nearly all costs beyond tuition on average than students who work part-time or do not work at all.[149, 150] Increased transportation costs associated with getting to and from work and an increased need for child care may contribute to this heightened spending among full-time workers.[151] While working during college can lead to higher earnings immediately after school—and up to 15 years later[152]—spending more than 15 hours a week on work unrelated to one's field of study is associated with lower degree completion, worse academic performance, and fewer credits taken per semester.[153,154] These findings suggest that working during college is a complex decision for students that is often necessary but comes with challenges.

Older students are far more likely to have low incomes than younger students, which creates barriers to college completion. Students with low incomes are more likely to be older, female, and Black or Latinx[155, 156] and work longer hours than high-income students. They are more likely than high-income students to be working for financial security and in jobs that do not align with their academic or career goals.[157] In contrast, higher-income working students are more likely to have jobs that directly relate to their career goals, which benefits their future job prospects.[158] For higher-income students, working while attending college is largely a beneficial experience. For students with lower incomes, work often creates additional obstacles to degree completion, even though it provides students with necessary resources to address their needs while attending school.[159]

ADDRESSING CHALLENGES IN MEETING COSTS BEYOND TUITION CAN IMPROVE GRADES & DEGREE COMPLETION

Research suggests that helping older students address their financial challenges—including costs beyond tuition—can improve their academic performance and degree completion.[160] Program evaluations in Fort Worth, Texas; New Orleans, Louisiana; and Tacoma, Washington have found a relationship between participation in programs that increase financial security and degree completion, among other positive academic outcomes.

Randomized control trials and program evaluations suggest that financial assistance and wraparound service programs can address challenges in meeting costs beyond tuition, while also advancing equity by helping women, student parents, and students with higher cost burdens persist and complete their degrees. In a randomized control trial evaluating the Catholic Charities "Stay the Course" program at a large community college in Fort Worth, Texas, participation in a pilot offering emergency financial assistance to community college students with low incomes led to a significant increase in degree persistence and attainment.[161] Women participating in this program saw particularly pronounced gains in degree attainment as their chances of earning a degree tripled.[162] A randomized control study of The Opening Doors Demonstration in New Orleans, which offered emergency financial assistance for flexible spending on non-tuition expenses to student parents with low incomes, found similar gains in enrollment and educational attainment of program participants.[163] A quasi-experimental evaluation on a Tacoma Housing Authorities (THA) program found that students who participated in a THA program that provided affordable housing near several public college campuses had higher grade point averages (GPAs) and completion rates when compared to similar peers who did not participate in the program.[164]

Family Composition & Structural Racial & Gender-Based Disparities Affect Older Students' Experiences with Costs Beyond Tuition

Costs beyond tuition vary substantially between older students with different family compositions. Older students with dependents have higher cost beyond tuition expenditures than older students without dependents. Older students who are parents face particularly high costs beyond tuition and have similar financial resources as older students who are not parents.[165] However, older students' cost beyond tuition expenditures do not vary significantly by race or gender, despite differences in resources and income by both race and gender.[166] This suggests that on average, older students face different costs-beyond-tuition *burdens* based on their family composition, race, and gender.

TOTAL COSTS BEYOND TUITION ARE GREATER FOR OLDER STUDENTS WITH DEPENDENTS

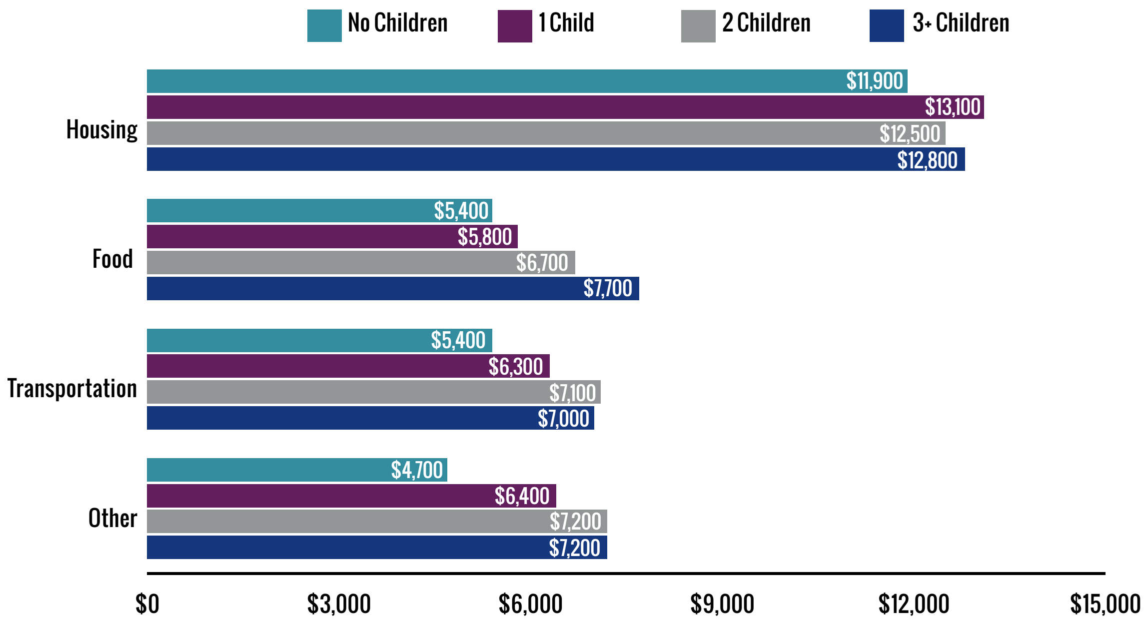
Costs beyond tuition are greater for older students with dependents than those without dependents.[167] Older students with dependent children spend on average $33,300 per year on costs beyond tuition, compared to $27,400 per year on average for older students without dependent children. Moreover, student parents—especially Black student parents—take on greater debt than students without children.[168] These data help underscore why making college more affordable and addressing costs beyond tuition is important for racial equity and for the well-being of student parents and their families.

While about $900 of the increased spending by older students with dependent children comes from additional expenses on dependent care, the remaining $5,000 comes from increases in other costs beyond tuition categories because of dependents' additional living costs. (Note: For older students with dependents, dependent care is a significant cost. However, unlike other spending categories, many students report no spending on dependent care, which depresses the estimate of average spending on dependent care among older students. Many older students may also receive public assistance to help address dependent care needs. That public support may reduce the dependent care expenditures that appear in the underlying dataset, which would further reduce this estimate of average dependent care spending. For more, see the next subsection "Dependent Care Can Be a Significant Expense for Older Students".)

Older students' annual spending on food, clothing and personal care, and utilities increases with additional dependents. Dependents are associated with food spending increases, driven by higher expenditures on food at home that exceed declines in spending on food away from home. While total household spending on clothing and personal care increases based on the number of dependents, this increase is driven by spending on clothes for children rather than adults. Figure 8 displays how housing, food, transportation, and other costs beyond tuition expenditures grow as the number of dependents increases.

FIGURE 8. Families with More Children Tend to Have Greater Housing, Food, Transportation, & Other Costs Beyond Tuition Expenditures

Older Students' Average Annual Costs Beyond Tuition by Expenditure Category, by Number of Dependents, CY 2014–2018



Note: Based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, are adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U), and are rounded to the nearest hundred. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

Source: Georgetown Center on Poverty and Inequality, 2021.

Despite the increases in total costs beyond tuition for older students with dependents, housing expenditures do not tend to increase as consistently with additional dependents, in our data. This may demonstrate some economies of scale, or may be the result of limitations in the underlying data, as differences by number of children are not significantly different. (Research suggests that nearly 20 percent of students at two-year colleges live with others beyond the expected capacity of their housing.[169]) Despite the pattern for housing expenses, costs beyond tuition generally tend to increase as the number of dependents increases.

DEPENDENT CARE CAN BE A SIGNIFICANT EXPENSE FOR OLDER STUDENTS

Older students' expenditures on dependent care include spending on child care, adult care (including nursing homes), and child support. Older students who report spending on dependent care spend on average $4,400 per year on dependent care expenditures.

Child care expenditures can be a particularly large component of older students' costs beyond tuition. Older students who have child care expenditures spend on average $3,800 per year on child care (which includes pre-K). For these students, child care spending is larger than spending on personal, health, or educational expenditures.

For at least two key reasons, average dependent care expenditures in this analysis are low. First, nearly half of older students (47 percent) have no dependents and therefore no dependent care spending, which brings down the average cost of dependent care.[170] (In contrast, there are virtually no households with zero spending on food in our pooled data sample.[171]) Second, the average amount of spending on dependent care among students with dependents does not fully reflect the need, as high-quality early childhood education is cost prohibitive and unavailable for many student parents—and many older students cannot afford to incur necessary dependent care expenditures.[172] In fact, average child care costs are more expensive than in-state tuition costs at public colleges in at least 30 states.[173] Indeed, in this analysis, only 20 percent of older students have positive total dependent care spending and only 14% have positive child care spending (see Figure 9).

Older students who have child support expenditures spend on average **$4,900 PER YEAR ON CHILD SUPPORT**—larger than spending on personal, health, or educational expenditures.

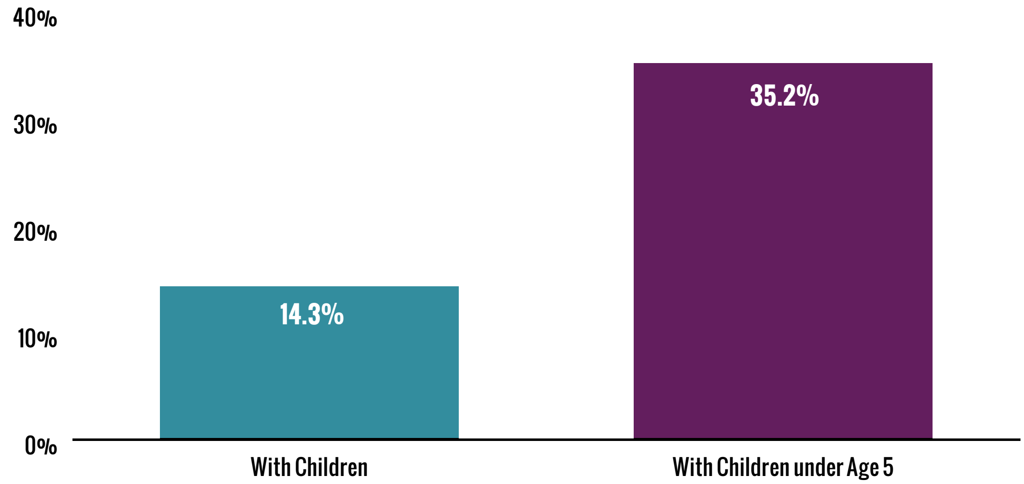
Older students with dependents who cannot afford paid care can be skilled in managing these financial constraints,[174] and may instead arrange for and make do with informal care for their dependents, such as support from family or friends. Alternatively, some older students with dependents who struggle to afford paid care receive free or reduced cost care through a public benefit program, or even free pre-K, which limits out-of-pocket spending on dependent care.[175] Parents who cannot find affordable child care often take leaves of absence from college or leave their programs entirely.[176]

Rates of child care spending are higher for single parent older students than for married parent older students.[177] This finding is consistent with the reduced need for child care spending for families with more than one potential caregiver at home.[178] More than one-third of single parent older students have positive child care expenditures.[179] The approximately two-thirds of single parent older students who do not have positive child care expenditures may instead rely on informal caregivers such as siblings and grandparents to ensure they have the capacity to focus on school and other responsibilities.[180]

Child support can be a significant expenditure for some older students. Older students who have child support expenditures spend on average $4,900 per year on child support—larger than spending on personal, health, or educational expenditures.

FIGURE 9. More Than 1 in 3 Older Students with Young Children Spend on Child Care

Percent of Older Students with Child Care Expenditures by Age of Child, CY 2014–2018



Note: Based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, which are adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U). Percentages are rounded to the nearest tenth. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

Source: Georgetown Center on Poverty and Inequality, 2021.

Older Student Parents' High Costs Beyond Tuition May Contribute to Completion Challenges

Older student parents face heightened costs beyond tuition and increased challenges to college completion compared to older students who are not parents. Older students with children spend on average $5,900 more per year on costs beyond tuition than do older students without children. Research also suggests that a substantial proportion of student parents, including older student parents, face housing and food insecurity.[181] This result is consistent with older student parents facing unaffordable costs beyond tuition and significant constraints on their time as they often balance employment, school, and family responsibilities.

Student parents' college completion rates are lower than those of students who are not parents, which may be related to their increased costs beyond tuition.[182, 183] According to data from one large urban U.S. university, students with preschool-age children have only 10 hours per day to dedicate to schoolwork, sleeping, and leisure, compared to 21 hours per day for students without children.[184] This lack of time is likely related to student parents' increased costs beyond tuition and increased need to spend time with their children. For example, many older students lack adequate access to convenient and affordable child care that would allow them the time necessary to complete their schoolwork.[185] These findings suggest that older students with children face heightened costs beyond tuition, and increased demands to balance family, work, and college responsibilities, without sufficient economic or social supports. (See "The Public Benefits System is Not Designed to Serve Students" in Section IV for more information on how economic supports fail to meet the needs of students, including student parents.)

IN CONTRAST TO OLDER STUDENTS' SUBSTANTIAL INEQUITIES IN FINANCIAL RESOURCES, COSTS BEYOND TUITION VARY LITTLE BY RACE OR GENDER

On average, older students of color spend similar amounts on costs beyond tuition as white students, despite facing lower pay,[186] less financial aid,[187] and systemic inequities as workers and consumers.[188] Structural racism in housing, education, and employment have created enormous racial disparities in resources, including income, wealth, and access to public benefits.[189] Alongside these racial inequities in access to resources, older students who are Black, Latinx, or Asian face costs beyond tuition as high as their white counterparts.

RACIAL AND GENDER INEQUITIES intersect to create particular **BARRIERS FOR WOMEN OF COLOR** to address their costs beyond tuition and complete college degrees.

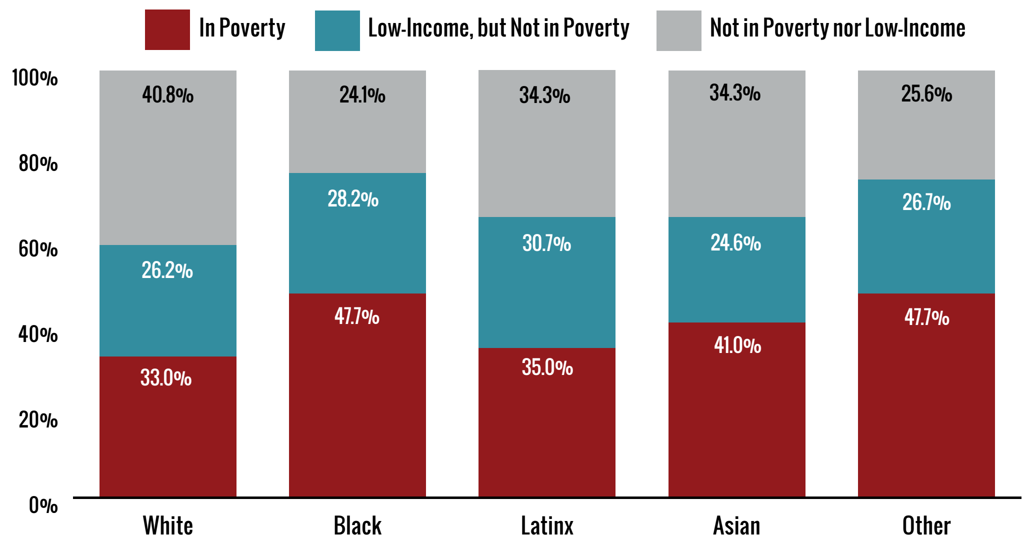
Racial inequities in access to resources are most pronounced for older Black students. For example, older Black students spend similar amounts on rent as white students,[190] but are more likely to be severely rent burdened—which refers to paying more than 50 percent of household income on housing—in part due to systemic racism and discrimination in economic and housing policies.[191] Additionally, due in part to both systemic racism and race-neutral policies that fail to correct past inequities, federal and state education funding has disproportionately benefitted colleges that primarily serve white students.[192]

Similarly, older students' costs beyond tuition spending varies little by sex despite disparities in resources. Female older students spend similar amounts on costs beyond tuition as male older students despite facing systemic resource inequities that hinder their ability to afford these costs. As women, older women students likely have fewer financial resources, and face labor market discrimination[193] and higher prices for goods and services than older male students. These gendered differences are due to structural inequities, such as the gender wage gap, motherhood penalty, and the "pink tax"—the phenomenon when products and services marketed towards women cost significantly more than similar products that are marketed to men[194, 195]—all of which racism exacerbates for women of color.[196] Additionally, compared to male students, female students are 2.5 times as likely to have dependents and 1.6 times as likely to be single parents, increasing costs beyond tuition for older female students and heightening gender inequities in completing college.[197]

Racial and gender inequities intersect to create particular barriers for women of color to address their costs beyond tuition and complete college degrees.[198] Women of color in college, especially Black, Latinx, and American Indian women, face the compounded effects of systemic racial and gender inequities that threaten their educational opportunties.[199, 200] Racism and gender-based discrimination also create labor market inequities that can depress the earnings of women of color after completing college degrees.[201] Further, women of color are more likely to be parents and single parents than white women students,[202] which can create additional challenges to completing college degrees. In this sense, women of color face particularly heightened barriers to address their costs beyond tuition, and can earn less than their white and male counterparts even after earning a degree. Figure 10 illustrates inequities in older students' incomes by race.

FIGURE 10. More Than 3 in 4 Black Older Students Have Low Incomes or Are in Poverty

Distribution of Older Students by Race & Comparison of Income to Federal Poverty Guidelines, AY 2015–2016



Note: Based on analysis of National Center for Education Statistics (NCES) National Postsecondary Student Aid (NPSAS) data. The sample has been limited to undergraduate students attending Title IV postsecondary institutions; not enrolled in colleges in Puerto Rico; those who have not previously obtained a four-year, graduate, or professional degree. Older students are ages 25-45. Income is from the 2014 calendar year and includes income of spouse. American Indian and Alaska Native students are omitted from this analysis due to sample size limitations. Poverty is defined using federal poverty level guidelines for 2014. "Low income, but not in poverty" refers to students whose income is between 100 and 199 percent of the federal poverty guideline for their household. "In poverty" refers to students whose income is between 0 and 99 percent of the federal poverty guideline for their household. AY stands for academic year.

Source: Georgetown Center on Poverty and Inequality, 2021.

IV. For Older Students, Financial Aid & Public Benefits Can Be Inadequate & Conflict

Federal student financial aid and public benefits programs are the two main public resources college students can use to afford costs beyond tuition. (While state financial aid can also help students afford costs beyond tuition, it is beyond the scope of this report to analyze state systems of financial aid, given the substantial differences that exist across states nationwide.[203]) The federal HEA mandates that colleges establish reasonable cost of living allowances, which financial aid officers use to determine what amount of funding is needed to achieve a "modest but adequate" standard of living.[204] About six out of every ten older students have low incomes[205, 206] and many are eligible for public benefits,[207] such as food assistance or health coverage.

However, neither federal student financial aid nor public benefits programs are adequate, alone or together, for older students to meet costs beyond tuition. Rather than complementing each other, these two systems can present students with contradictory incentives—such as those emphasizing work at the expense of education. In turn, older students are often forced into a balancing act that includes juggling school, work, and family, and is made worse by administrative burdens from public benefit programs that are supposed to help.

Federal student financial aid does not adequately serve older students due to both policy design that disproportionately excludes older students and inadequate assessments of older students' need. The federal student aid need analysis undervalues older students' costs beyond tuition by underestimating the costs older students bear in their roles as caregivers and workers. Partly as a result of these underestimates, the federal government supplies far less grant-based and work-study-based aid than students need, particularly for those who attend school part-time.[208]

About **SIX OUT OF EVERY TEN** older students have **LOW INCOMES** and many are eligible for public benefits, such as food assistance or health coverage.

Public benefit programs exclude and inadequately serve students in ways that disproportionately affect older students and that compound challenges posed by the student financial aid system. The federal government does not adequately communicate public benefits availability and eligibility rules to older students.[209] Core public benefits programs, such as the Supplemental Nutrition Assistance Program (SNAP) and child care subsidies, exclude many students either categorically or through onerous work requirements and administrative burdens that older students may struggle to meet and demonstrate.[210] For older students who do manage to qualify, public benefits are often inadequate due to underfunding,[211] use limitations, and issues with eligibility restrictions.[212, 213]

To be sure, recent policy changes have reformed public benefit programs to better serve students' needs during the COVID-19 pandemic. For example, ED and the U.S. Department of Agriculture (USDA) recently issued guidance to colleges to inform them about temporarily-expanded SNAP eligibility for students facing food insecurity.[214] These temporary changes are steps in the right direction that should be followed by longer-term reforms to public benefit programs that better support older students.

Financial Aid Inaccurately Measures & Inadequately Supports Older Students' Costs Beyond Tuition

Though older students make up nearly a third of college students (30 percent),[215]—almost 40 percent of public community college students and more than 60 percent of private, nonprofit community college students[216]—they are forced to navigate a system that treats their lived experiences as an exception in ways that overburden and undermine their educational success. Older students frequently experience the following problems with the federal financial aid system:

1. Federal student aid need analysis underestimates older students' costs beyond tuition by centering younger students without dependents.[217]
2. Need analysis[218] and administrative practices often neglect or effectively penalize the ways older students attend college and balance their roles as caregivers and workers.
3. The federal government funds far less grant-based and work-study-based aid than older students need.[219, 220]

These structural financial aid challenges can cause major problems for older students seeking to afford and complete college. Understating need for support through inaccurate COA estimates and implausible Expected Family Contribution (EFC) assumptions (see subsection "Expected Family Contribution") leads to shortfalls in aid for living expenses, forcing students into untenable situations such as deciding between textbooks and food.[221] Insufficient aid[222] and grant and work-study funding leaves older students burdened with costs beyond tuition that threaten their immediate academic success and debt that threatens their long-term financial well-being.

COMPONENTS OF FINANCIAL AID NEED ANALYSIS: COST OF ATTENDANCE, EXPECTED FAMILY CONTRIBUTION, & UNMET NEED

Cost of Attendance

COA estimates the budget a student needs to complete a full year of college study (usually two semesters of full-time classes), as mandated in the federal HEA.[223] Colleges calculate COA and use it to make financial aid packages and publish their estimates for students' information.[224] A college may calculate distinct COAs for different types of housing arrangements, using average allowable living expenses for subsets of their student population (e.g. students living on campus, students living off campus), as long as the college uses the same measurement and estimation methods to produce all COAs.[225] Calculating accurate COA estimates is essential for providing students with adequate financial aid.

Federal guidance instructs colleges to estimate COA to reflect a "reasonable"[226] standard of living that is modest but adequate, but ED has not been permitted by Congress to clarify this standard in much detail. Filling this void, the National Association of Student Financial Aid Administrators (NASFAA) has advised institutions that COA does not permit greater costs from "lifestyle choices,"[227] such as renting housing outside of walking distance to campus or deciding to live without housemates. COA should capture both direct costs, which are paid to the institution, and indirect costs, which students must incur in order to live and study but do not pay directly to the school.[228] Direct costs include tuition and fees, as well as room and board for students living on campus.[229] Indirect costs within a COA generally include necessary living expenses (e.g. room, board, transportation, etc.) deemed "allowable costs" under Section 472 of the HEA.[230] Under the HEA, students enrolled less than part time or studying in correspondence programs face additional limitations on room and board costs.[231] (Note: Prior to the Consolidated Appropriations Act, 2021 (CAA), students who are incarcerated were generally prohibited from receiving the Pell Grant.)

COA calculations of students' indirect costs often lack consistency and transparency.[232] Though the HEA is heavily prescriptive in defining which cost categories are allowable under COA, colleges' COA estimates can vary dramatically from school to school, even within the same city,[233] due to minimal[234] federal methodological guidance and varying methods for calculating indirect costs.[235, 236] A 2017 study found that almost half of all colleges produced COAs which set allowable living costs at levels 20 percent above or below the authors' local county-level estimates for the same costs.[237] Lack of consistency exists throughout the COA process, with administrators making numerous judgment calls when creating COAs (such as whether to base housing expenses on shared or single accommodations, without guidance from ED on how to do so most consistently and equitably). Making matters worse, both the federal government and colleges fail to proactively educate students about the "professional judgment" process,[238] through which administrators can adjust individual students' COAs on a case-by-case basis, considering only circumstances particular to the student making the appeal.[239] Additionally, university systems sometimes set a uniform COA for their member schools across geographically disparate locations.[240]

Because COA sets the upper limit of federal financial aid a student can receive (and sometimes state and institutional aid),[241] its accuracy and consistency are critical to ensuring affordability through adequate financial aid.[242] If the COA fails to capture expenses realistically and is too low, it can contribute to higher student debt[243] and heightened student financial hardship[244] that can result in decreased school performance and lowered completion rates;[245] a COA that is too high may lead to students assuming more debt than is necessary,[246] as students may take out more loans than they need to meet their COA. Unfortunately, there is evidence that colleges with higher enrollments of Black, Latinx, and Asian students generally use lower allowable living-cost expense figures,[247] raising the possibility that inaccurate COAs are causing racial inequities such as a lower likelihood that students of color receive adequate aid packages.

Expected Family Contribution

ED calculates the EFC from information provided by the student or their family on the Free Application for Federal Student Aid (FAFSA).[248] Colleges use the EFC to determine what portion of college costs a student and their family are responsible for paying, based on a portion of the family's income and wealth.[249, 250] Financial aid administrators deduct the EFC from COA to determine the dollar amount of financial aid grants (including Pell), loans, or work study.[251, 252] If a student's EFC exceeds their COA, they are not eligible for any federal need-based financial aid.[253] The lowest possible EFC is zero, which makes a student eligible for the maximum amount of federal need-based grants, loans, and work-study, adjusted by their enrollment status and the COA. [254, 255] (Note: Under recent legislation, the forthcoming Student Aid Index (SAI), which replaces EFC, can result in negative values—to a limit—when it is fully implemented in 2023.[256])

Though completing the FAFSA is time-consuming, students under a certain income threshold may complete a simplified FAFSA, a streamlined version of the full-length application.[257] Those who are eligible for the simplified needs test and have incomes below an even lower threshold are eligible for an "automatic zero" EFC.[258] For school year 2021-22, the automatic zero threshold is a combined adjusted gross income of under $27,000 for the parents of dependent students, as well as for independent students with dependents and their spouse.[259] Though they may be eligible for the streamlined FAFSA, independent students without dependents are not eligible for the automatic zero designation.[260]

Title IV of the HEA defines the formulas used in EFC calculations; EFC exempts a portion of a student's family's income and assets (referred to as "allowances"), which is meant to reflect the amount necessary to cover each immediate family member's "very basic living expenses."[261] The formulas adjust these allowances based on family size, marital status (of the student or student's parents), student age, state of residence, number of working individuals in a household and amounts earned, taxes paid, dependency status, and the number of postsecondary students in the family.[262] The EFC calculation process does not consider a family's consumer debt, which, especially in cases such as credit card debt, may cause the EFC to misstate a family's ability to contribute to the cost of college.[263] The lack of consideration of a family's consumer debt can worsen racial inequities as families of color are disproportionately likely to have consumer debt.[264] Additionally, EFC cannot drop below zero[265], which obscures the vastly different levels of student need[266] among the almost 40 percent of undergraduate FAFSA applicants who qualified for a zero EFC.[267]

The HEA allows students to appeal through professional judgment the data used in calculating their family's EFC.[268] Financial aid administrators at the student's college can review the request for professional judgment and decide if a student's additional costs (for example, on dependent care) merit a recalculation of the EFC, potentially providing some relief to the student.[269] An extremely small share of all students lower their EFCs through this process, however.[270]

Unmet Need & Loans

Financial aid administrators determine unmet need by calculating the difference between the COA and the EFC, minus any grants (including the Pell Grant) and scholarships already secured by the student.[271] The majority of unmet needs are covered by federal student loans, which generally must be repaid with interest by students or their families.[272] As of the 2020-2021 academic year, undergraduates can borrow a maximum amount of direct federal loans each year, ranging from $5,500 to $12,500, based on their year in school and their dependency status.[273]

Pell Grants, for the lowest-income students, can reach up to $6,345 for school year 2020-21, depending on the school's COA, the student's EFC, the student's enrollment status (full-time versus part-time), and the duration of enrollment for the academic year (full-year or part-year).[274] Full-time students may receive Pell for a maximum of twelve semesters[275] (while part-time students can receive a Pell Grant for more than 12 semesters).[276] Pell Grants do not need to be repaid unless a student decreases their enrollment status (thereby losing some amount of the grant), or withdraws from their program during one of their loan payment periods.[277]

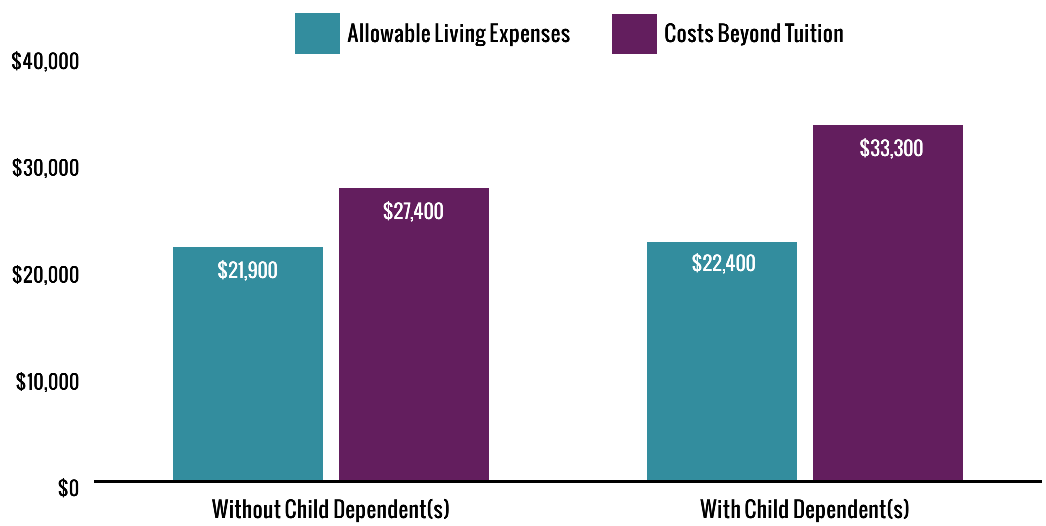
COLLEGES' NEED ANALYSES OFTEN EXCLUDE OR OVERLOOK OLDER STUDENTS

Colleges' allowable living expense estimates (when annualized) do not align with older students' self-reported costs beyond tuition. Older students' (ages 25-45) self-reported costs beyond tuition expenses exceed institutions' estimates by about $8,800, on average.[278]

Among older students, institution-reported student living expenses least accurately reflect spending among students with child dependents. These students face an even larger gap, on average—about $10,900—between what they spend on living costs and what institutions estimate they need (see Figure 11). These shortfalls could cap available federal financial aid (including loans) far below the amount most students spend on tuition and costs beyond tuition, posing immense barriers especially for older students.

FIGURE 11. Institution-Reported Allowable Living Expenses are Least Accurate for Older Students With Children

Average Total Allowable Living Expenses and Costs Beyond Tuition for Older Students (Ages 25-45) by Caregiver Status, CY 2014-2018



Note: Allowable Living Expenses are based on analysis of 2016 National Center for Education Statistics (NCES) National Postsecondary Student Aid (NPSAS) data. Estimates have been annualized to 12 months by assuming a nine-month academic year. The sample has been limited to undergraduate students attending Title IV postsecondary institutions; not enrolled in colleges in Puerto Rico; those who have not previously obtained a four-year, graduate, or professional degree, and who are attending full year. Older students are ages 25-45.

Costs beyond tuition estimates are based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, are adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U), and are rounded to the nearest hundred. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

Source: Georgetown Center on Poverty and Inequality, 2021.

Colleges' methods for estimating student living costs vary widely and likely fail to accurately represent older students' realities, which may contribute to disparities in unmet need. ED suggests a range of methods for calculating COA.[279] These methods vary widely—from student surveys to asking landlords for estimates—and frequently under-resourced financial aid administrators at each institution make their own decisions about which method to use.[280] Since younger students make up 70 percent of today's student body,[281] methods that simply aggregate students' costs may not reflect the full needs of older students. Additional sources commonly referenced for living expense estimates, such as USDA food plans,[282] also do not accurately reflect and often underestimate older students' expenditures.[283]

Older students are more than **SIX TIMES AS LIKELY** to have **DEPENDENTS** and **THREE TIMES AS LIKELY** to **WORK FULL-TIME** while enrolled.

Even in cases when administrators conduct wider-ranging surveys, the samples upon which colleges base their COA estimates may disproportionately miss older students. Older students are more likely to belong to groups facing greater hurdles to survey response.[284] General survey response rates vary by student characteristics, with some studies indicating students who are low income,[285] a parent,[286] or lacking computer and internet access,[287, 288] may be less likely to respond. These characteristics are correlated with being an older student.[289]

FINANCIAL AID RULES DO LITTLE TO ACCOMMODATE OLDER STUDENTS' ROLES AS CAREGIVERS & WORKERS

Older students are far more likely than younger students to have significant demands on their time and resources outside of their academic pursuits. Older students are more than six times as likely to have dependents and three times as likely to work full-time while enrolled.[290] About half of older students with dependents (51.9 percent) are single parents.[291] Thus, it is unsurprising that older students are more than twice as likely to attend college part-time and more than twice as likely to maintain their own off-campus household, potentially raising commuting and time costs.[292]

Federal need analysis has limited capacity to reflect dependent costs

Student need analyses have limited capacity to reflect dependent costs for four key reasons:

1. The HEA limits federal financial aid for dependents' living expenses;
2. Financial aid for dependent care fails to meet the need;
3. The EFC underestimates the totality of students' financial obligations; and
4. Financial aid administration practices often place the onus on older students to learn about and claim aid that is available for dependent costs.

The HEA unrealistically limits financial aid coverage of costs of custodial and noncustodial parents. Federal financial aid policy allows for "reasonable" dependent care expenses,[293] but does not allow additional food, housing, and clothing and personal care expenses for dependents to count towards a student's COA.[294, 295] In cases of exceptional hardship, students can appeal to their financial aid office to have their COA raised.[296] However, as described elsewhere in this report, older students with child dependents report spending about $5,000 more per year on non-child-care costs beyond tuition than older students without dependents, on average,[297] especially on food, transportation, and health care. COA does not acknowledge the obligations of the seven percent of older students who must make child support payments, averaging $4,900 per year[298] (however, child support obligations can be considered as a modification to EFC during the professional judgment process).[299] These data points suggest COA fails to acknowledge sizable financial obligations and responsibilities.[300]

Even financial aid for child care fails to meet need. COA, which sets the maximum amount of federal aid for which a student could qualify, does not account for enough[301] dependent care[302] to meet the needs of older students who balance family, school, and often work responsibilities.[303, 304] Instead, the COA tends to account for partial child care need.[305] However, students, like other workers, may find securing quality child care for only a few hours per week or at nontraditional hours to be difficult if not impossible.[306] Even child care centers on campus, a critical form of support for student parents[307] that unfortunately is not offered at many colleges,[308] may not suffice if the care is needed "after hours"[309] or is located far from the work or home location. In addition to creating potential financial strain, this systemic shortcoming makes college completion harder for older students. A 2018 analysis of single mother college students suggests that lack of affordable care severely limits student parents' ability to spend more time studying, working, or pursuing self-care activities, forcing them to make daunting choices about staying in school.[310]

The other major component of financial aid need analysis, EFC, also has major limitations in estimating a student's financial obligations. The calculations that make up the EFC ultimately determine the available resources a student or their family has to pay for the costs of college attendance. However, EFC can overstate[311] a family's "financial strength"[312, 313] for several reasons. Consumer debt, including legally obligated and enforced debt payments, which is a significant issue for millions of Americans, does not figure into the EFC. This oversight means that, as an example, income may be tallied by the EFC as "available" when the student has already budgeted it to pay off a family member's medical debt.[314] Additionally, EFC has limited ability to incorporate dependent expenses for students with low incomes, thereby neglecting a significant financial stressor for parent students. Perhaps most importantly, EFC cannot drop below zero,[315] obscuring the different levels of student need[316] among the almost 40 percent of undergraduate FAFSA applicants who qualified for a zero EFC as of 2015-16.[317] With women, students of color (particularly Black students), independent students with dependents, and first-generation college students particularly likely to have a zero EFC, mechanisms that more clearly differentiate among zero-EFC students can help ensure that financial aid resources are equitably awarded and do not perpetuate systemic racism and sexism.[318]

Additionally, financial aid administration practices often place the onus on older students to learn about and claim aid that is available for dependent costs. Dependent care costs are a standard COA component, as colleges set standard COA allowances for child care. However, through the professional judgment process, financial aid administrators can choose to adjust a student's COA and EFC, on a case-by-case basis, to reflect higher than average dependent care costs.[319] Because this system is ad hoc and underutilized, students often do not know that professional judgment is available.[320]

The professional judgment process has limited ability to address these challenges. This process may be further limited for students of color, as implicit bias may affect the execution of professional judgment, as financial aid administrators use significant personal judgment in making decisions.[321] Moreover, professional judgment cannot further reduce a zero EFC for students with the least resources (though it can raise the COA of students with a zero EFC who can demonstrate higher costs in specific categories).[322] Because Black, American Indian, and Latinx students are most likely to have automatic zero EFCs (due to their household income level), they are less likely to receive relief through the professional judgment process on their EFC.[323]

COA misses major transportation expenses for off-campus students

Per federal guidance, institutions exclude vehicle purchases when estimating COA, which means they exclude nearly half of the average older student's transportation expenses as allowable costs (see Figure 12).[324]

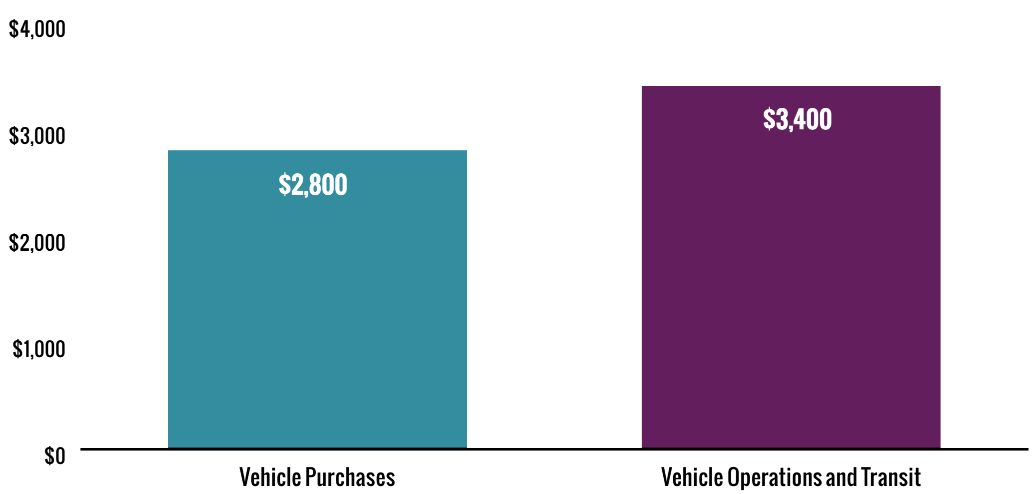
COA's exclusion of vehicle purchases ignores transportation access and infrastructure realities of older students who predominantly live off-campus, creating one of the largest unmet needs among categories of costs beyond tuition. Aside from dependent living expenses, vehicle purchases are the largest expenses that are necessary for many older students[325] (particularly those who balance paid employment and caregiving responsibilities and do not have access to effective public transportation) that financial aid ignores.[326]

Because of limited public transportation options and geographic inequities, vehicles are often necessary expenses. Researchers have identified public transit deserts in at least 52 U.S. cities.[327] Only 21 percent of people regularly use public transportation in urban areas and only six and three percent do in suburban and rural areas, respectively; most ridership is in the Northeast (driven largely by New York City). Even within areas with public transit, much of the country's bus and rail infrastructure is in poor condition.[328]

Due to racist regional planning policies such as redlining,[329] which resulted in disinvestment in neighborhoods with primarily Black and brown residents, and the suburbanization of employment, Black and Latinx households with low incomes are disproportionately likely to be located far from public transportation and places of work.[330, 331] Black and Latinx households with low incomes are disproportionately represented among older students' households. Research shows that transportation challenges are a critical barrier to college completion for Latinx students and contributes substantially to the difference between Latinx and non-Latinx completion rates.[332]

FIGURE 12. Older Students Spend Nearly as Much on Vehicle Purchases as Vehicle Operations & Transit Combined

Average Older Student's Annual Expenditures on Transportation, by Subcategory, CY 2014–2018



Note: Based on analysis of pooled 2014-2018 Consumer Expenditure Surveys (CE) interview files. Figures represent annual consumer unit (CU) expenditures, are adjusted to 2020 dollars using the Consumer Price Index for All Urban Consumers (CPI-U), and are rounded to the nearest hundred. CE estimates include CUs with at least one student ages 25-45 who is the householder, spouse, or unmarried partner, excluding those who live in student housing. CY stands for calendar year.

Source: Georgetown Center on Poverty and Inequality, 2021.

The financial aid system harshly penalizes part-time attendance over longer periods of time

As parents and workers, older students—particularly those with low incomes—often face harmful tradeoffs between time and money. Many students who do not complete their degrees cite the financial and time challenges of balancing work and family obligations with school.[333] Research has shown that student parents of children under the age of six spend additional hours—totaling three days per week—caring for children as compared with students of similar demographic backgrounds without children, leaving student parents with far less time for completing schoolwork.[334] Because of time constraints, these students are unable to meet their material needs by scheduling more work hours, but they are also unable to decrease their work, school, or caregiving schedules to relieve their time stress. As time-saving practices and options may be costly, many students with low incomes spend more time on daily living tasks than students with high incomes, such as using transit options that are more affordable but also more time intensive.[335]

Attending college part-time to navigate time constraints drastically reduces financial aid resources available to students. As mentioned elsewhere in this report, nearly half of older students (49 percent) attend college part-time.[336] According to recent research, a smaller share of part-time students than full-time students "receive any grants (55 percent vs 77 percent), loans (29 percent vs. 54 percent), or work-study funding (2 percent vs. 10 percent)."[337] The HEA imposes harsh limits on students who attend part-time, severely limiting aid for some of the largest costs beyond tuition. For example, less-than-half-time students generally can receive only reduced aid for housing and food for only up to three semesters (and only two consecutive semesters).[338] Part-time students' Pell Grant awards must be scaled down in proportion to their full-time-equivalent status even though costs beyond tuition do not decrease proportionally to credit hours.[339] Financial aid used toward a prior incomplete degree counts toward a student's lifetime limit for both direct loans and Pell Grants,[340] meaning older students who are returning to higher education are potentially starting out with fewer resources, if their prior credits do not count toward their current program.

FEDERAL AID SUPPLY FALLS SHORT OF STUDENTS' NEED

Pell Grants, work study awards, and child care support for student parents consistently fall short of the full cost of college, leaving students scrambling to meet their expenses.[341] Pell Grants originally covered the majority of the cost of college,[342] including costs beyond tuition, but awards have not kept pace with overall inflation or tuition, health care, child care, and housing inflation.[343] The maximum grant now covers only 28 percent of the average COA of a public four-year degree.[344] Moreover, the Pell Grant program faces an annual appropriations process, making it vulnerable to funding fluctuations unrelated to student need.[345] For example, Congress cut Pell Grant lifetime usage eligibility, among other eligibility reductions, in 2008 and again in 2012—at times when more students faced greater college costs due to state education funding cuts in the aftermath of the 2007-2009 Global Financial Crisis.[346]

Federal Work-Study (FWS) is also inadequate to help students meet their financial needs. One study found that an average full-time undergraduate engaged in FWS could afford to pay only 19% of costs beyond tuition with money earned through their placement.[347] FWS is both underfunded and poorly targeted as only 15 percent of FWS dollars went to community colleges, although community colleges enroll 40 percent of all students.[348] Additionally, FWS often supports low-paying jobs that do not offer career preparation aligned with student interests.[349]

Mismeasurement and underfunding can undermine auxiliary programs for college students' costs beyond tuition. Child Care Access Means Parents in School (CCAMPIS) provides a perfect example. Under CCAMPIS, ED awards colleges grants to provide subsidized child care services, which can help colleges expand their child care offerings primarily to parents with low incomes.[350] However, the program is consistently underfunded.[351] In the 2016–2017 school year, the program awarded merely $187,000 per year per participating school on average.[352] In 2020, the Government Accountability Office (GAO) identified that ED had severely underestimated program use and cost in its budget request to Congress.[353] These shortfalls limit the reach of this popular program, leaving more children on CCAMPIS waitlists than were actually served by the program during the 2016–2017 academic year.[354] To be sure, CCAMPIS also faces other challenges, including securing more postsecondary institutions to participate in the program as it has seen its appropriations grow (a challenge implied by recent ED budget justifications noting the awarding of funds to many unfunded prior-year submissions after exhausting qualified current-year submissions).[355, 356]

The Public Benefits System Is Not Designed to Serve Students

While the federal financial aid system fails to adequately recognize older students' needs as caregivers and workers, federal public benefits programs often exclude and underserve them as students. Programs that provide critical public assistance for major costs beyond tuition, such as food, housing, or child care, pose structural problems for students:

1. Several core public benefits programs frequently exclude students through restrictive eligibility and onerous work reporting requirements (referred to in statute as "work requirements").
2. Administrative burdens and limited efforts to publicize information and application materials can make it hard for eligible students to learn about and access benefits.
3. For students who do manage to qualify, public benefits are often inadequate due to underfunding, use limitations, and eligibility thresholds indexed to a poorly-designed and outdated poverty measurement.

These shortcomings disproportionately impact older students, the majority of whom have low household incomes,[357] and a greater proportion of whom rely on public benefit programs than younger students (see Figure 13). Restrictive eligibility rules create racial inequities including in health outcomes and in poverty rates,[358] and ensure older students are less likely to be able to access public benefits. Additionally, as older students balance academic and family obligations, barriers like onerous administrative or work reporting requirements particularly affect their ability to apply for and receive public benefits. Finally, even when older students can access them, benefit levels may be insufficient to adequately support their needs.[359]

PUBLIC BENEFITS PROGRAMS EXCLUDE STUDENTS THROUGH RESTRICTIVE ELIGIBILITY & ONEROUS WORK REPORTING REQUIREMENTS

Eligibility rules for several public benefits programs, such as SNAP and the Child Care Development Fund (CCDF),[360] categorically exclude a large portion of college students. For example, with the notable exception for students with children under the age of 12, students attending school more than half-time face exclusions from SNAP.[361, 362] GAO estimated that this policy excluded from SNAP about 1.4 million students who were likely food insecure during the 2015-2016 school year.[363] The extent to which states restrict student parents from receiving CCDF funds varies: four states prevent student parents from receiving CCDF funds, nine others require full-time student parents to meet work reporting requirements to receive CCDF funds, and others restrict which postsecondary programs students who receive CCDF funds may pursue,[364] while others do not restrict student parents from accessing child care subsidies.[365]

Other public benefits programs, such as Temporary Assistance for Needy Families (TANF), deny access to many students after a certain period. TANF, which is administered as a block grant that enables states to exclude students or impose stringent work reporting requirements,[366] only reached 23 percent of families in poverty in 2018.[367] TANF's limited reach is in part due to its work reporting requirements, which have a racist history and prevent people from accessing needed economic supports.[368] College does not count as a qualifying "core work activity" under TANF,[369] which often prevents students from accessing the program's benefits, as students would generally need to supplement college with paid employment in order to qualify for TANF.[370] Federal TANF rules do allow participants to use college to fulfill their work reporting requirements but for a lifetime maximum of only 12 months, and some states set even shorter limits.[371] Thus, full-time college students with low incomes generally do not have access to TANF for a majority of their tenure in college.

SNAP work reporting requirements **LIMIT STUDENT ACCESS**, frequently **REQUIRING STUDENTS TO BALANCE WORK AND COLLEGE ATTENDANCE** to qualify for SNAP benefits.

SNAP is another public program with strict work reporting requirements that prevent many students from participating. SNAP work reporting requirements limit student access, frequently requiring students to balance work and college attendance to qualify for SNAP benefits. In some states, students enrolled less than half time[372] must spend at least 80 hours per month working or in a qualifying training program in addition to school to qualify for SNAP.[373] (Note: Some requirements have been temporarily relaxed during the COVID-19 pandemic.)[374]

As discussed in more detail earlier, similar rules limit students' access to child care subsidies. Some states require that, to qualify for child care subsidies through the Child Care and Development Block Grant (CCDBG) Act, which authorizes CCDF, full-time students work as much as 20 hours per week in addition to attending school.[375] Policymakers have attempted to introduce similar restrictions to Medicaid through state waivers that would establish work reporting requirements or through proposals to restructure Medicaid into a block grant program, like TANF and CCDF.[376]

Older students may struggle to complete these work reporting requirements without sacrificing their academic and personal well-being. Although many students pursue paid employment while in school and may need to do so in order to support themselves and their families, work unrelated to a student's field of study and in excess of 15 hours per week is correlated with lower grades and lower college completion rates.[377, 378] Working students with low incomes, who are disproportionately Black, Latinx, women, and older, are more likely to work long hours in unrelated jobs[379] simply, as one expert stated, "to put food on the table."[380] In general, rather than promoting financial stability, work reporting requirements counterproductively reduce support for costs beyond tuition in essential areas like food, housing, and health care.[381]

Undocumented immigrant students face additional exclusions from public benefits programs. In particular, the Trump Administration's public charge rule, which can prevent immigrants from receiving a green card or visa if they access certain public benefits, can prohibit immigrant students from receiving necessary public assistance.[382] The Biden Administration has committed to not defend the public charge rule in court and issued an Executive Order to review the matter,[383] but the chilling effect this rule has had in many immigrant communities may continue.[384]

ADMINISTRATIVE BURDENS & INFORMATION GAPS PREVENT POTENTIALLY ELIGIBLE STUDENTS FROM PARTICIPATING IN PUBLIC BENEFITS PROGRAMS

Administrative burden, which includes the costs individuals bear when interacting with a government institution, also affects older students' participation in public benefits programs. Administrative burden reduces participation in public benefits by making it difficult to learn about and comply with programs, and it tends to be greater for programs meant to reduce basic needs deprivation. Heavy administrative burden can have a chilling effect on program participation, especially for programs that assist families with low incomes with living expenses.[385] Since older students experience acute risks of poverty, severe time constraints, and already bear significant burden from complex financial aid application processes, they are particularly vulnerable to administrative burden from public benefits programs.

Many students, like U.S. residents more broadly, are not aware of available public assistance because public benefits can have complicated rules and are rarely well advertised. Millions of people mistakenly believe they are ineligible for even the most well-known public benefits programs, such as SNAP or job training.[386] Research indicates that nonparticipants would likely apply if they knew they were eligible.[387] Similar issues extend to college campuses. At about two-thirds of campuses considered in a GAO study, college students and officials reported being "unfamiliar with" or unable to "fully understand" SNAP eligibility rules for students.[388] Indeed, over half of food-insecure, SNAP-eligible students in 2016 did not report SNAP participation.[389] Efforts to proactively inform households of likely eligibility can lead to increased program participation.[390]

Many public benefits require significant time—which may be unavailable to many students with low incomes—to apply and to continue participation. Application procedures may include questionnaires, documentation, and interviews, often in-person.[391] Participants often must repeat these onerous processes on an ongoing basis to retain benefits.[392] Poor infrastructure (e.g. dysfunctional websites or sparsely located offices) and staffing make complying with these requirements even more difficult.[393] For example, Arkansas added a work reporting requirement for Medicaid participants and cut almost 17,000 participants (12 percentage points) for failing to meet the new burden in the first six months. Remarkably, the cuts failed to advance even the policy's own goals; a study showed that 95 percent of those who lost Medicaid coverage under the policy likely should have been exempt from the policy or were engaged in sufficient qualified activities to meet its requirements.[394] These challenges compound for low-income students who likely spend longer hours on tasks of daily living that they cannot afford to do in a more expeditious manner[395] and already deal with administrative burden from financial aid.[396]

PUBLIC BENEFITS CAN BE INADEQUATE DUE TO UNDERFUNDING, PROGRAMMATIC LIMITATIONS, & POORLY-DESIGNED POVERTY MEASUREMENT

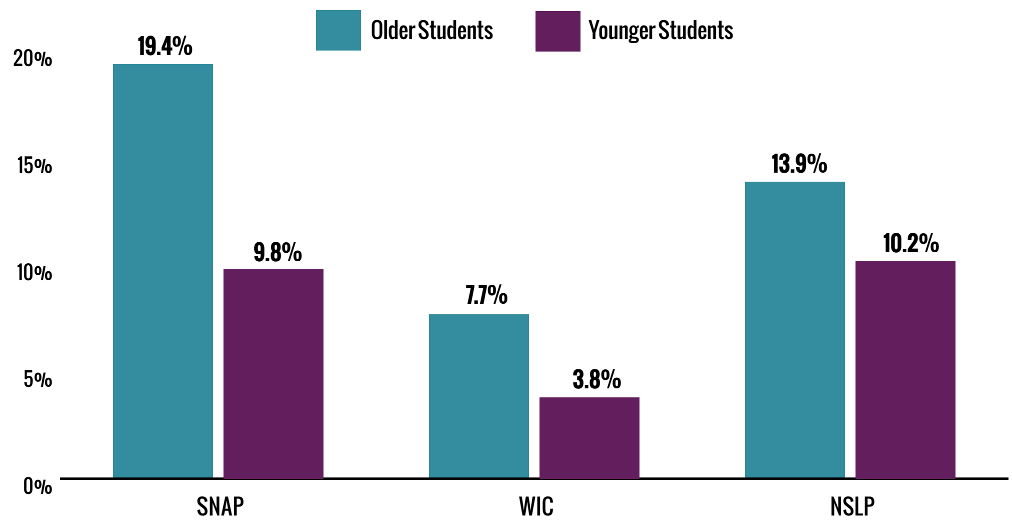
Insufficient funding and intentional redirection of resources restrict the supply of public benefits well below the need. As a result, several major benefits programs lack adequate funding to provide benefits to all eligible households. For example, only one in four eligible households receives housing assistance, due to inadequate supply of affordable housing and funding for housing assistance.[397]

For older students who qualify for assistance under block grants like TANF or child care subsidies, funding can be limited and eligibility can be narrowed such that support is rare and modest.[398] Indeed, only 2.5 percent of older students reported that their household received cash assistance through TANF during the 2014 calendar year,[399] and CCDF served only one in four families eligible for child care subsidies in 2015.[400]

Paternalistic limits on benefits use mean that, by design, public benefits programs rarely cover all necessary costs beyond tuition. For example, older students' spending on food illustrates misalignment with SNAP restrictions. SNAP can be immensely helpful for older students, and about one in five older students live in households participating in SNAP.[401] However, older students rely heavily on SNAP-ineligible foods, such as prepared meals or college cafeteria meal plans.[402] Older students spend about $1,700 on food away from home per year, on average.[403] Older students often eat meals away from home, and most campus dining options are limited to prepared foods.[404] Also, as discussed elsewhere in this report, time is particularly scarce for older students, and a typical SNAP budget assumes approximately two hours per day to prepare household meals.[405] In comparison, nationally, the average single adult (with or without children) spends only 35 minutes on daily meal preparation.[406]

FIGURE 13. Nearly One-Fifth of Older Students Rely on Public Food Assistance Programs

Share of Older Students Whose Households Received SNAP, WIC, & National School Lunch Program, AY 2015 - 2016



Note: Based on analysis of National Center for Education Statistics (NCES) National Postsecondary Student Aid (NPSAS) data. The sample has been limited to undergraduate students attending Title IV postsecondary institutions; not enrolled in colleges in Puerto Rico; and those who have not previously obtained a four-year, graduate, or professional degree. Receipt of benefits is under the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), or National School Lunch Program (NSLP). Benefit receipt of SNAP, WIC, or NSLP includes whether any member of the student's household received any amount of that benefit during the 2013 or 2014 calendar year. AY stands for academic year.

Source: Georgetown Center on Poverty and Inequality, 2021.

Policymakers have not created a robust federal public assistance program for every type of cost beyond tuition. For instance, the federal government has no unified programs to provide household benefits to help people with low incomes afford transportation, as it does with the other large costs beyond tuition—food, housing, and health care. As mentioned elsewhere in this report, the average older student spends about $5,500 on transportation each year.[407] Transportation assistance, such as free or reduced-price public transit fare, largely occurs through a patchwork of local or regional programs—and few programs subsidize private transportation in public transit deserts.[408] Additionally, the federal government offers little standardized, widely-available support for technology costs.[409] On average, older students report spending $2,100 per year on technology, which is largely driven by cellular and broadband costs.[410] (Note: Some older students may have reduced technology costs due to the Lifeline program, which provides discounted phone and broadband service to people with low incomes.[411]) Even among the few low-income households who manage to participate in cash assistance through TANF, which could be used toward transportation or technology costs, benefit levels leave family incomes well below the federal poverty line across the U.S.[412]

In addition to supply and use limitations, policymakers have fundamentally designed public benefits to target a lower standard of living than postsecondary institutions recognize as necessary. Public benefits, though important in reducing poverty,[413] do not guarantee financial aid policy's target of a modest but adequate living standard.[414] Federal policy typically targets public benefits using an income-based poverty line, which is considered the floor for basic living standards below which a U.S. family will suffer material deprivation.[415] This framework differs conceptually from financial aid, which focuses on students achieving a modest but adequate living standard.

The gap between a "modest but adequate" living standard and a deprivation-level living standard is compounded by the fact that the Official Poverty Measure (OPM) threshold is too low and underestimates U.S. poverty. (See Section V, "Recommendations".) The OPM uses an overly simplistic design based on severely outdated household spending patterns from the 1950s and 1960s and understates U.S. families' current income deprivation.[416] The too-low OPM threshold informs the U.S. Department of Health and Human Services Poverty Guidelines commonly used for program planning and eligibility. As a result, program funding, reach, and benefit levels can fall short of their full potential.[417] (Note: Programs, including SNAP, Medicaid, and health coverage premium subsidies under the Affordable Care Act, often reach people with incomes above the official poverty line, but nevertheless use the poverty line to set eligibility parameters and benefit levels.)

V. Recommendations

Assessing and addressing older students' costs beyond tuition is critical to equitable college access, affordability, and completion. These costs comprise a substantial share of the full cost of college for older students—especially for those with dependents—who make up nearly one third of today's student body,[418] affecting their decisions and college outcomes. And assistance for costs beyond tuition, whether through the financial aid or public benefits systems, is often inadequate at best and inaccessible at worst. Financial aid measures of costs beyond tuition do not accurately and fully reflect older students' lived experiences in caregiving, working, and living in poverty or with low incomes. Meanwhile, public benefits place unrealistic and counterproductive burdens on students.

This report outlines a set of overarching recommendations that policymakers, administrators, and practitioners can implement to address costs beyond tuition, support older students' needs, and improve college access and success. These recommendations interweave analysis of higher education financial aid and public benefits—and the intersection between the two—to offer new contributions that center the unique needs of older students. Recommendations primarily focus on federal policy, but some also apply at the state, local, and college levels. These solutions focus on providing students with more generous, effective resources and improving governmental and institutional accountability. In turn, these suggestions would help reduce racial, gender, and socioeconomic inequities in college affordability, completion, and economic outcomes.

Below, this section offers recommendations in the following four categories:

1. **Reduce Out-of-Pocket Spending on Costs Beyond Tuition for Older Students:** Federal, state, and local policymakers—and colleges—should reduce students' costs beyond tuition by increasing programs and benefits that alleviate student expenses in areas like housing, food, transportation, and child care.[419]

2. **Increase Grant & Work Study Resources for Older Students' Costs Beyond Tuition:** Policymakers should increase grant and work study resources to improve older students' degree attainment and post-college earnings—an investment which experts estimate could more than pay for itself through future tax revenue.[420, 421]

3. **Facilitate More Older Students' Access to Existing Financial Aid & Public Benefits Resources:** Policymakers and college administrators should change financial aid and public benefit policies to make financial aid more responsive to the needs of part-time students and those who attend college over long durations, and by ensuring older students can be eligible for public benefit programs, and by better connecting students to supports for which they are eligible.[422]

4. **Measure Costs Beyond Tuition Accurately & Inclusively:** To provide adequate financial aid and public benefits support, the federal government must ensure estimates of students' living expenses are accurate and designed to capture older students' financial needs and responsibilities.[423]

Ultimately, all levels of government should structure, fund, and administer student financial aid and public benefits such that, in combination with policies that reduce costs beyond tuition, older students and their families—along with everyone in the country—would be guaranteed a decent baseline living standard. Higher education policy should offer additional options of support that can reach beyond tuition to complement more expansive public benefits programs, whether in their current inadequate state or in a more generous one.

Reduce Out-of-Pocket Spending on Costs Beyond Tuition for Older Students

Federal, state, and local policymakers—and colleges—should work to reduce the amounts students need to spend on costs beyond tuition. Federal policymakers should expand national programs that provide affordable goods and services in areas like child care, food, transportation, and other costs beyond tuition. Administrators should pursue and expand partnerships with trusted and effective local government and nonprofit entities that provide affordable housing, transportation, food, internet, technology, child care, and other goods and services that reduce student spending on costs beyond tuition.

EXPAND FEDERAL PROGRAMS THAT REDUCE OUT-OF-POCKET SPENDING ON COSTS BEYOND TUITION

To help reduce costs beyond tuition, the federal government should build on national programs that provide students—particularly low-income older students—with goods and services that lower out-of-pocket costs beyond tuition, such as rental, child care, and nutrition assistance. By reducing costs beyond tuition, federal programs can help improve economic security and academic outcomes for older students.

Expand funding & reach for programs that reduce costs beyond tuition to reach everyone in need

Policymakers should expand existing programs that provide affordable goods and services that reduce older students' costs beyond tuition. Demand for existing programs that help students address their costs beyond tuition, particularly those that offer subsidized child care and housing, often far outweighs supply.[424]

Congress and federal agencies should expand and sustain funding and reach for existing programs that can help address students' costs beyond tuition. For example, U.S. Department of Housing and Urban Development (HUD), U.S. Department of Health and Human Services (HHS), and ED should request, and Congress should appropriate, more funding to increase the supply of affordable housing and child care.[425,426] Existing programs are inadequately funded to meet student need. For example, federal rental assistance programs and services only serve one-fourth of eligible low-income households,[427] due to decades of federal funding cuts.[428] Additionally, in recent years, more eligible children have been on waitlists for than have been served by federal child care programs, including both broad programs like CCDF and the student-parent-specific CCAMPIS.[429, 430, 431] Congress should increase funding for these programs, and ED should increase outreach to colleges to provide them with technical assistance on how to establish on-campus child care centers and provide off-campus support, such as subsidizing community-based child care or home visits for students with children.[432] COVID-19 stimulus legislation, including the American Rescue Plan, took important steps in the right direction with large, temporary investments in critical rental and utility assistance[433] and much-needed funding for child care programs,[434] which should inform proactive, permanent policies in the future.

Congress should also pass legislation to restructure existing programs or establish new programs to reduce costs beyond tuition where current public programs fall short or simply do not exist. In particular, new or restructured programs that effectively provide, incentivize, or otherwise help students access high-quality affordable housing, transportation, and communications technology[435] could improve older students' educational and economic well-being.

Increase benefits levels to reduce out-of-pocket spending on costs beyond tuition

Congress and federal agencies, and their state counterparts, should ensure that existing programs offer participants sufficient support through adequate, evidence-based benefits levels. While public benefits can be powerful tools for reducing hardship and out-of-pocket spending on costs beyond tuition, benefits levels typically fall short of older students' needs. For example, the maximum SNAP benefit falls short of what the average low-income, food-secure household reports spending on meals in nearly every county in the country.[436] For TANF, states, on average, provide participating three-person families a maximum of $462 per month in cash assistance,[437] which is less than a fifth of the average older student's spending on costs beyond tuition.[438] Racial discrimination in policy design and implementation has led to even lower TANF benefits levels in states with more Black residents.[439]

PURSUE & EXPAND STATE- & LOCAL-LEVEL PARTNERSHIPS TO REDUCE STUDENTS' OUT-OF-POCKET SPENDING ON COSTS BEYOND TUITION

State and federal governments should increase funding to expand existing partnerships with public and non-profit entities that reduce older students' costs beyond tuition. Various state and local public and nonprofit entities have experience in—and some funding to provide—affordable housing, transportation, food, internet, technology and educational materials, child care, and other goods and services that can reduce older students' costs beyond tuition. Increasing funds to such partnerships could allow them to provide crosscutting, holistic services to help reduce costs beyond tuition for more older students.[440, 441] Federal, state, and local government actors should also invest to promote innovation and best practices in these partnerships and should especially focus investment on programs that address the needs of students with low incomes and students of color[442] as well as immigrant and first-generation students[443] to advance educational equity and economic security.

An example of a local partnership that reduces students' costs beyond tuition is the City University of New York (CUNY) Accelerated Study in Associate Programs (ASAP). CUNY ASAP is an initiative primarily funded by the City of New York supplemented by state and private philanthropic funds[444] that supports students in various ways including providing students with counseling, covering students' book costs,[445] and offering a transportation subsidy for students via a public transit card.[446, 447] Other initiatives replicating these efforts elsewhere in the U.S., such as in West Virginia[448] and Ohio,[449] have experienced the same success as CUNY's model in promoting graduation rates.[450]

THA's College Housing Assistance Program (CHAP), which provides rental assistance to students enrolled at Tacoma Community College (TCC), exemplifies how such a partnership can provide students with affordable housing. Through CHAP, THA uses flexibility offered by Moving to Work, a HUD program to which public housing authorities can apply,[451, 452] to subsidize apartments for TCC students who are experiencing homelessness and have very low household incomes. Preliminary quasi-experimental evidence suggests that CHAP may increase housing stability and academic outcomes for the students it serves.[453]

In early childhood care and education, federally-funded Head Start offers local non-profit organizations grants to provide early learning and care and other Head Start services for income-eligible children under six and their parents. Student parents benefit from the types of support that Head Start offers the parents of its early childhood students, including coaching and referrals to services.[454] Colleges could partner with Head Start as a provider of child care on campuses, benefitting all key stakeholders: student parents, their children, the colleges, and the campus child care centers.[455]

Increase Grant & Work-Study Resources for Older Students' Costs Beyond Tuition

Higher education actors at the federal, state, and local levels should ensure older students' access to resources that can help them afford their costs beyond tuition. Policymakers should increase grant and work-study resources to improve students' degree attainment and post-college earnings—the sorts of investments that experts estimate could more than pay for themselves through future tax revenue.[456, 457] Policymakers and administrators can do so by increasing grant-based student aid, including emergency aid, and expanding work-study programs.

INCREASE GRANT-BASED STUDENT AID

Policymakers should increase federal and state need-based grant aid and ensure that state, local, and institution-level grant aid interactions maximize total grant aid. Additionally, any state, local, and campus free tuition and grant aid programs should ensure their eligibility rules include older students.

Increase the Maximum Pell Grant Award to Better Meet Older Students' Needs

Few federal actions are likely to be more consequential than increasing and maintaining the value of the maximum Pell Grant award—the backbone of grant-based student aid in the U.S.—allotted to students with lower incomes. In AY 2016 (the academic year considered in this report's data analyses), the maximum award was $6,227[458] (2020 dollars),[459] which represented only 15 percent of the average older student's full cost of college, including both tuition (and fees) and costs beyond tuition.[460] Many experts call for at least doubling the current maximum Pell Grant,[461, 462, 463] and some have found the maximum Pell Grant award would have to nearly triple in size to maintain its real value from the 1970s (the earliest available data after the program's inception).[464] Congress should establish an automatic mechanism to index the maximum Pell Grant award to growth in the full cost of college, including tuition and costs beyond tuition, based on a new Consumer Price Index (CPI) measure combining a higher education measure such as Bureau of Labor Statistics' CPI for college tuition and fees[465] or the State Higher Education Executive Officers Association's Higher Education Cost Adjustment[466] with a CPI measure reflecting costs beyond tuition.[467, 468] Congress could further protect Pell Grant funding and program structure by treating it as a mandatory program; currently Pell operates largely like an entitlement program but is funded as a discretionary one.[469] This arrangement is harmful because the annual appropriations process makes the Pell Grant vulnerable to funding fluctuations unrelated to student need.[470]

Increasing the maximum Pell Grant would help older students address their costs beyond tuition because recipients can use the award for costs beyond tuition when the award exceeds tuition and fees—which happens most often at community colleges. Older students also have disproportionately low incomes and are more likely to take on high amounts of debt to attend college.[471, 472] Increasing the Pell Grant to match increases in tuition and living expenses could therefore help reduce older students' debt and after-college wealth disparities between older and younger students.[473, 474]

Maximize the amount of state, local, & college grant-based aid

States, local governments, and colleges should ensure their free college and grant-based aid systems help older students address their costs beyond tuition. As this report recommends for Pell Grants, these non-federal sources of aid should ensure grant awards are realistically calibrated to costs beyond tuition and maintain their value as the cost of living changes over time.[475] States, local governments, and colleges should also enact first-dollar models of aid, which provide aid to students without considering other sources of funding students may receive.[476]

First-dollar models maximize available resources to students as they supplement—rather than replace—other sources of grant-based aid. They avoid the pitfall of "last-dollar" awards, which add sources of aid but not necessarily total amounts of aid.[477] For example, a program that provides funding for a student's tuition and fees regardless of other funding allows that student to use additional flexible funding like Pell Grants toward costs beyond tuition. On the other hand, a free college program that covers the remainder of tuition and fees outstanding after applying the same student's Pell Grant provides no support for costs beyond tuition. By implementing first-dollar models, non-federal grantors of student aid can better help students address their costs beyond tuition.

Ensure older students qualify for state, local, & college grant-based aid

States, local governments, and colleges should ensure that older students qualify for their respective sources of grant aid or free college programs. Non-federal grantors of student aid sometimes exclude students—based on age (including years since high school graduation), part-time attendance intensity, prior higher education, or undocumented status—from accessing some, or all, of the funding that is available to other students.[478, 479] States, localities, and colleges should review their eligibility rules to ensure they do not arbitrarily exclude older students from receiving the full amount of their respective sources of aid.

Ensure older students have access to emergency aid

Colleges and governments should provide emergency aid grants to cover unexpected student expenses. Unexpected expenses that create even relatively small financial hurdles, such as hospital stays or vehicle repair, can threaten a student's ability to achieve their highest potential, or even complete their degree (see Section III, "The Weight of Older Students' Costs Beyond Tuition Can Undermine College Affordability & Completion"). Students with lower incomes are particularly vulnerable to unexpected expenses toward the end of a degree as they are likelier than higher-income students to exhaust their financial aid before degree completion.[480] Providing students with emergency aid could play a substantial role in helping students, particularly those with low incomes, complete college. Federal, state, and local governments, as well as colleges, could contribute funding to provide all older students with additional emergency aid to cover unexpected expenses as needed.

Many colleges already provide access to emergency aid.[481] For instance, Ohio State University funds emergency relief grants for which students with lower incomes can apply if they are at risk of leaving college due to an unexpected financial emergency.[482] The CUNY Chancellor's Emergency Relief Fund provides $500 one-time grants to students facing hardship during the COVID-19 pandemic which are specifically targeted towards single parents, students near graduation, students who are undocumented or not a resident of the United States, and students who generally lack access to other public supports.[483] Due to insufficient funding, the majority of these awards are distributed to eligible students through a lottery system.[484] During the COVID-19 pandemic, the CARES Act provided one-time large scale federal funds for colleges to administer emergency aid grants.[485] Making permanent such programs and expanding them nationwide would especially help older students remain enrolled at educational institutions and complete their degrees.[486]

INCREASE WORK-STUDY OPPORTUNITIES, PARTICULARLY AT COMMUNITY COLLEGES

Federal and state policymakers should increase the prevalence and value of FWS opportunities for older students.[487, 488] Since the program's early years, researchers have found evidence that FWS could reduce hours spent on off-campus work and spent in transit and increase engagement with campus communities.[489] However, in 2017, the value of the average FWS award was worth less than one-fifth of the value of the average award in the 1970s, relative to the cost of tuition and fees at a public four-year college.[490] Increasing FWS opportunities and their value could help older students address their costs beyond tuition without having to incur debt.[491]

Policymakers should distribute FWS opportunities more equitably by providing more FWS opportunities to community colleges. Because of its outdated and unstructured allocation processes, FWS opportunities tend to be concentrated in well-resourced private nonprofit universities, which disproportionately serve younger students.[492, 493] As mentioned earlier, community colleges receive only 15 percent of FWS dollars, although community colleges enroll 40 percent of all students, and proportionally more older students.[494] To advance educational equity and meet the needs of older students, policymakers should revise FWS allocation formulas and dedicate funding to provide more FWS opportunities for community college students, who comprise a disproportionate share of older students.

Increasing FWS opportunities and value may also open students' access to other public benefits, particularly for programs (such as SNAP) which have work reporting requirements,[495] and the Earned Income Tax Credit and Child Tax Credit, which currently require earnings. Increasing FWS supply could therefore reduce older students' incurred debt, decrease their expenditures on food, facilitate their access to tax credits, and help them afford other costs beyond tuition.[496]

Facilitate More Access to Existing Financial Aid & Public Benefits Resources for Older Students

Policymakers and administrators should reform financial aid and public benefit systems to facilitate older students' access to aid and benefit programs by 1) making financial aid more responsive to the needs of part-time students and those who attend college over long durations, 2) changing public benefit program rules that make older students ineligible by failing to accommodate their education, work, and care responsibilities, and 3) facilitating older students' access to resources that can alleviate their costs beyond tuition by simplifying the processes and infrastructure for application, compliance, and receipt.

MAKE FINANCIAL AID MORE RESPONSIVE TO THE WAYS OLDER STUDENTS ATTEND COLLEGE

Government policymakers and college administrators should change financial aid policies to foster inclusion and flexibility in financial aid delivery, attendance intensity, and college career length and continuity. Doing so would better meet the needs of older students, who regularly balance time between school, paid employment, and caregiving.

Update financial aid rules to promote students' autonomy regarding their time & college attendance intensity

Older students have many reasons to attend school at varying intensities and for varying durations, but financial aid rules can limit the extent to which part-time students qualify for financial aid for costs beyond tuition, or disqualify them entirely from major sources of student aid if students take less than six credits in a semester.[497, 498] In some cases, financial aid policy changes may enable part-time students to spend more time on school. Congress and other policymakers increasing aid could help older part-time students cover more of their costs (both tuition and non-tuition) and reduce the number of hours the student must work in paid employment. Federal, state, and college policymakers should explore more equitable approaches to part-time financial aid policies. Keeping in mind that even full-time students often are not provided adequate aid and need to find paid employment while in school, financial aid policies should offer students who must or choose to attend college part-time fair aid that reflects their and their colleges' expenses.[499]

Federal policymakers should alter or remove rules that lead to part-time students receiving disproportionately less aid towards a college degree than full-time students. Examples of such rules range from lifetime limits unique to part-time students, such as allowing many part-time students only three non-consecutive semesters of any aid for room and board, to entirely disqualifying students attending less than half time from receiving direct federal loans.[500] Students' reasons for lower intensity or interrupted attendance include family caregiving and financial responsibilities and more. All students with financial need should qualify for some degree of aid in relevant costs beyond tuition while pursuing a college degree, regardless of their attendance intensity.[501]

Update financial aid rules to support students with longer or discontinuous college careers

Financial aid should better support students with longer or discontinuous college careers. For instance, all types of financial aid should be available year-round to support continuous attendance, similar to the year-round Pell Grant (restored in 2017).[502] If this structure were broadly implemented, students with lower attendance intensity or delayed starts, as is the case for many older students, could earn credits during summer and in between terms. Additionally, removing or extending lifetime limits on financial aid, such as the equivalent of six years of full-time attendance in funding for Pell Grants,[503] would support those with longer college careers.

At the college level, the University of Alabama's "Back to Bama" campaign exemplifies a financial aid policy that could encourage students with discontinuous college careers to return to school. The university invites students to return who previously stopped attending college before completing a degree, offering them a free first class and a simple application for scholarships and aid money.[504]

ALIGN PUBLIC BENEFIT PROGRAMS' ELIGIBILITY & USE RULES WITH THE LIVED REALITIES OF OLDER STUDENTS

Policymakers and administrators should remove barriers to student eligibility for and use of public benefits programs. These barriers include work reporting requirements, time limits, and use restrictions that do not align with older students' needs. Broadening public benefits eligibility and use would provide older students with critical in-kind or cash resources to put towards costs beyond tuition, including but not limited to food, health care, and child care.

Remove federal & state policy barriers, such as work reporting requirements, to older students' public benefits eligibility & use

To make the largest positive impact, policymakers should restructure public programs to qualify more low-income college students, including expanding eligibility broadly to students and adults without children who currently face many of the most extreme eligibility restrictions.[505] One of the most impactful policy changes available is for Congress to remove any remaining work reporting requirements in public benefits programs that ensure a basic foundation for people. These requirements harm a substantial number of people including students and caregivers.[506] Policymakers could also facilitate better access to programs by removing severe time limits on program participation, such as the federal rules for TANF which allow participants to pursue education and training without meeting work engagement requirements for only 12 months[507] or the federal "able-bodied adult without dependents" time limit, which generally limits SNAP receipt for adults without dependents to three months every three years, unless they can meet work reporting requirements.[508]

Policymakers should ensure that public benefits do not categorically exclude students and that allowed public benefits uses support students. Although there is currently an exemption for students to participate in SNAP due to the COVID-19 pandemic, students attending more than half-time are usually excluded from this program.[509] Additionally, to make SNAP better reflect older students' time and choice constraints, federal policymakers should extend students' qualifying benefit uses to include prepared foods offered on college campuses.[510] Policymakers should evaluate all public benefits programs to remove similarly counterproductive, harsh, or paternalistic restrictions that make it harder for students to invest in their careers through higher education.

Maximize students' public benefits eligibility through state & local flexibility in federal programs

In the absence of these important structural changes, colleges should work with local and state agencies to maximize eligibility through state and local rules and exemptions so that more students can access benefits such as SNAP, CCDBG, Medicaid, and TANF. For example, states can implement broad-based categorical eligibility, which makes households receiving non-cash TANF or state maintenance of effort funded benefits automatically eligible for SNAP and can relax income and asset eligibility limits.[511] In another example, states can better utilize authority to designate many college programs as meeting "employment and training" requirements so that students can meet SNAP work reporting requirements.[512]

Oregon undertook a broader, systemic approach with a first-in-the-nation statutory requirement that the state better align public benefits to support students with low incomes, in service of state college completion goals.[513] This alignment process resulted in more integrated supports for students and better information and stronger partnerships among all stakeholders, including colleges, state public benefits programs, advocates, private non-profits, and students.[514]

CONNECT STUDENTS TO SUPPORTS THROUGH PROACTIVE COMMUNICATION & SIMPLIFIED APPLICATION & COMPLIANCE

Separately and together, the public benefits and financial aid systems should make it easier for eligible students to learn about resources, apply for them, and continue to comply with associated requirements. Government and college administrators can do so by proactively communicating likely eligibility to students and simplifying the ways in which students interact with the public benefits and financial aid systems. Research shows that behavioral nudges such as reminders, feedback, default rules, and elimination of "hassle factors" (which impede a process, often at detrimental levels not commensurate with their importance, such as filling out an extra form) can all improve uptake of resources.[515, 516]

Proactively inform students who are likely eligible for additional resources

Policymakers at all levels of government and colleges should share data to screen students for—and proactively notify them and their campuses of—potential eligibility for additional resources. This data sharing must take place within bounds that assure students' safety, privacy, confidentiality, and right to refuse to share data. ED, the Internal Revenue Service (IRS), and other relevant agencies should make full use of the data sharing authority granted in the FUTURE Act, 2019,[517] and the CAA, 2021,[518] to screen consenting students for and inform them of their eligibility for public benefits and financial aid when students submit their FAFSAs.[519] The two bills protect confidentiality by asking students for initial consent for the IRS to share income data with ED as part of the FAFSA application and for ED to share non-tax information with other benefits-administering agencies; consent is valid until a student decides, at any point, to revoke it—as a measure towards balancing ease of opting in with control of data.[520, 521] State legislatures should allow state counterparts to these agencies to also proactively share eligibility information with students and colleges through processes that balance efficiency with privacy and confidentiality. Federal policymakers should also advance solutions found in proposals such as the BASIC Act, which would require ED to coordinate interagency efforts to enroll those students in federal benefits programs, including Medicaid and SNAP.

College staff members, who are necessarily interacting frequently with students, should integrate information about public benefits and additional financial aid throughout their ordinary student engagement. While providing students with information will not alone solve students' financial burdens, it could meaningfully facilitate student access to helpful aid and benefits. For example, college staff and faculty who work with students using campus child care services should advertise the option to apply to adjust financial aid to include some dependent care costs through professional judgment, if child care costs are above those established in the COA. Colleges could also bundle pre-screening for supportive services with existing advisory and financial aid programs so that students must opt out, rather than opt in, for discussions around public benefits. This approach increases the usage of public benefits in part by broadly increasing awareness about the application process and in part by decreasing the stigma of applying.[522] Additionally, when colleges provide students with complete information about benefits, they can help students access lesser-known public programs; for example, SNAP Employment & Training can cover some costs beyond tuition for SNAP-eligible students, including child care and transportation.[523] Even before college application and enrollment, community-based organizations could receive public funding to reach out to and support older (and other) students as financial aid navigators, as some college-promotion programs already do through high school partnerships.[524]

Simplify financial aid & public benefits application & compliance processes

Policymakers should simplify financial aid and public benefits applications and compliance by reducing applicants' burdens of reporting income, assets, employment, and other personal information. The CAA, 2021, building on the FUTURE Act, moved significantly to simplify components of the FAFSA and replace the former manual entry and verification process with a direct, automatic data-sharing channel between ED and IRS,[525] which decreases the burden on students in applying for and receiving financial aid. Congress and federal agencies should continue to smooth and reduce application, reapplication, and audit processes. Policymakers should also consider broadening access to benefits by implementing categorical eligibility, such as broad-based categorical eligibility does for SNAP and TANF (discussed earlier in this section).[526] Methodically streamlining financial aid and public benefits will also substantially benefit older students since they disproportionately have low incomes and often have more complicated financial needs,[527] particularly with dependent children[528]—and less free time to navigate financial aid systems.[529] Congress and agencies governing public programs, such as Medicaid, SNAP, TANF, and others can simplify public benefits applications and compliance by ending or reducing work reporting requirements.

Even within the existing federal frameworks, states can simplify public benefits applications and reporting to reduce student burdens. For instance, states currently can allow students to average the number of work hours across the semester to make work reporting requirements monitoring easier and to address fluctuating student academic and work schedules.[530] In another example, for some programs with asset testing, states can raise or eliminate limits on assets (such as vehicle values) to reduce administrative burden, increase eligibility, and protect essential student assets.[531]

Use federal & campus infrastructure to connect students with public services & supports

Colleges and government service providers should use existing infrastructure to connect students with services and supports, offering them when and where older students can access them.[532] Older students are often balancing work, caregiving, and school, with limited transportation support. It can therefore be challenging for older students to receive the full benefits of public services and supports if they are not offered in places students frequent, such as their campuses or near their work or living spaces, and at times that align with their schedules.

Colleges should make it physically easier for older students to access services and meet program requirements through measures such as campus application workshops and points of contact. As one example, in some states, SNAP program staff partner with colleges to offer SNAP application workshops on campuses.[533] In another example, many schools establish a single point of contact (SPOC) approach to provide information, make referrals, and help with applications including annual FAFSA submissions and a range of benefits.[534] Since 2009, the Colorado state government has mandated and provided technical assistance for SPOCs on each two- and four-year college campus (both public and private) to serve as a focal point for students experiencing homelessness and to increase their successful progress toward graduation.[535]

Measure Costs Beyond Tuition Accurately & Inclusively

To provide financial aid that meets older students' needs, the federal government must ensure COA and EFC costs beyond tuition measurements are methodologically sound and designed to fully capture older students' financial needs and responsibilities.[536]

ENSURE COSTS BEYOND TUITION MEASUREMENT METHODS ARE RIGOROUS & EVIDENCE-BASED

Policymakers must set standards to ensure COA and federal poverty guidelines accurately measure costs beyond tuition, which would enable government and college policymakers and administrators to equitably distribute sufficient financial aid and public benefits according to eligibility and need.

Provide rules & resources to ensure accurate COAs

ED must promptly develop standards to ensure that colleges estimate COAs with reasonable accuracy for all major subpopulations of their student bodies and with comparability across colleges. This regulatory power was granted in the CAA, 2021.[537] Institutions should be able to deviate from the standard methodologies only if they can prove that an alternative calculation would better advance accuracy and equity. The federal government should also supply sufficient financial resources and technical assistance to equip college financial aid administrators with the necessary tools to meet these methodological standards.

Standardization of how COAs are determined across institutions would promote equity in the distribution of financial aid. Community colleges and for-profit institutions, which generally have higher shares of low-income and older students than other postsecondary institutions, tend to understate total costs of attendance.[538] Standardization of COA across institutions would ensure that costs are more accurately estimated and, in turn, that lower-income and older students are eligible for greater amounts of financial aid.

Consider using income-eligibility measures aligned with actual need to inform public benefit program eligibility

Federal and state governments should explore the possibility of revising means-based eligibility rules, including by using a higher poverty line or other needs measure that better aligns with today's living standards where doing so would improve access and eligibility and make no one worse off. Basing HHS's federal poverty guidelines on a more robust measure than the outdated and inaccurate OPM[539]—or using an alternative needs measure altogether—could more effectively target means-tested public benefits such as Medicaid, SNAP, TANF, CCDBG, housing assistance, and many other programs. This change would benefit the 36 percent of older students who experience poverty under the official measure and more who have low incomes above the current poverty threshold,[540] reducing their reliance on debt and low-paid work to meet costs beyond tuition.

MAKE COA & EFC FULLY REFLECT OLDER STUDENTS' FINANCIAL NEEDS & RESPONSIBILITIES

Congress, ED, and college administrators should make sure COA and EFC are estimated with robust data collection and analysis methods that accurately measure older students while comprehensively capturing necessary costs beyond tuition such as child care and transportation. ED should provide standards and resources to college administrators to ensure that older students—especially those with dependents—are sufficiently represented in data sources used to inform COA estimates. Congress should update the HEA to allow both COA and EFC (and subsequently SAI) to have the ability to fully consider students' financial responsibility to others, such as children or other dependent family members; ED should work with colleges and researchers to determine how to best achieve such accuracy. Practices and policies that correctly measure costs beyond tuition will have tremendous benefits for older students, especially those who are parents (for whom reported costs beyond tuition most exceed their colleges' estimated allowable living expenses), which likely will advance racial and gender equity in financial aid distribution.

Base COA estimates on data that are representative of older students

Federal policymakers and college financial aid administrators should ensure that older students—especially those with dependents—are sufficiently represented in data sources used to inform COA estimates. In part because older students tend to report higher costs beyond tuition compared to younger students, colleges typically underestimate their expenses. This underestimation effectively limits the maximum financial aid available to the average older student below their demonstrated need.

As an example, any sample data informing COA estimates should be representative of a college's student body with respect to distributions of age, race and ethnicity, and gender and sex, possibly including oversampling to ensure schools can meaningfully interpret underrepresented groups' data. Colleges should ensure their timeframe and budget will allow for rigorous methods, such as testing survey questions with student focus groups or validating survey results with records of student bills and administrative records from federal, state, and local agencies.[541] Colleges or ED could also investigate whether reporting a separate COA estimate for student parents (similar to the way that colleges estimate different COAs for students living off-campus versus those living on-campus) would result in more accurate estimates of costs beyond tuition.

Update COA to include all costs necessary for older students to achieve a modest but adequate lifestyle

Congress should update the HEA so that allowable living expenses under COA include all major outlays necessary for older students to achieve the HEA's target of supporting a reasonable living standard. On average, older students' expenses on costs beyond tuition exceed COA by $8,800 per year. This substantial shortfall means older students cannot access financial aid—even loans—to cover more than a quarter of their reported costs beyond tuition.[542]

COA's omissions in certain expenses associated with dependents and transportation particularly impact the figure's accuracy for older students. Allowing COA to broadly reflect expenses on dependents beyond child care during school-related activities (housing, food, health care, etc.) could raise COA by more than $5,000 per older student, on average. Including expenses toward vehicle purchasing in COA could yield up to $2,800 more in financial aid for the average older student. Allowing full transportation costs would be especially important in areas where there is limited public transit infrastructure.[543]

Adjust EFC, & subsequently SAI, to better capture students' finances across income levels & family compositions

The federal government should evaluate and adjust EFC calculations to capture students', especially low-income students', financial resources and obligations more accurately and precisely. Since EFC, in combination with COA, determines the amount of financial aid—and Pell Grant awards in particular—doing so will make sure that students' aid accurately reflects their financial and family situations.

One analysis of the "real price of college" recommends investigating the inclusion of unsecured debt, such as consumer or medical debt, in the calculation of EFC to more accurately capture a family's financial strength.[544] Several experts[545, 546] have called for the federal government to allow the EFC to have a negative value[547, 548] to truly capture the needs of students whose families do not contribute to their finances so that students can obtain more accurate financial aid packages. The CAA, 2021, introduced important first steps toward these goals—including restructuring EFC (rebranded as the SAI) to permit negative values, to some extent—that will be implemented over the next few years.[549] This change will enhance the accuracy of a student's determined financial need,[550] but the lowest negative value is still a small fraction of the income protection allowance afforded to higher income students,[551] and Pell awards will still be capped at the level given to students with $0 EFC.[552] This will reduce the potential initial benefit of introducing a negative EFC, and it should be reconsidered going forward.

VI. Conclusion

College offers millions of people the opportunity to improve their economic security and lifelong well-being, including health outcomes. Increasing the number of people with college degrees likely would lead to economic benefits for the entire nation.[553] However, the full cost of college has become too expensive for many current and prospective students. In particular, older students—who represent nearly one-third of all college students, and are disproportionately women and people of color—face often-underappreciated challenges to completing college, including many related to costs beyond tuition. Older students' costs beyond tuition are typically far greater than the cost of tuition itself, and they can be substantial financial obstacles to degree completion. Costs beyond tuition worsen racial and gender inequities that can limit the benefits of college education. Understanding older students' costs beyond tuition, and accurately estimating their full cost of college, is critical to designing policies capable of helping older students succeed.

Recent policy developments represent steps in the right direction toward alleviating students' costs beyond tuition. Even temporary policy changes in response to the COVID-19 pandemic underscore both the need for further, substantial changes that help mitigate students' financial burdens, and the political feasibility of more fully addressing students' costs beyond tuition.

Policymakers and practitioners should strive to build on recent success to advance meaningful solutions that reduce costs beyond tuition, increase grant and work study resources, improve access to more generous financial aid and public benefits, and measure costs beyond tuition accurately and inclusively. In doing so, policymakers and practitioners can meaningfully advance racial and gender equity. This report offers a path forward that is as ambitious as it is necessary: college is far too expensive, and the vast majority of student expenditures go toward costs beyond tuition.

We need to take bold steps to build on recent progress to meet the needs of older students. We need to understand the full cost of college, measure it accurately, and provide students with the resources they need to thrive academically and personally while pursuing and completing college degrees.

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