Understanding the Implementation of Universal FAFSA Completion Policies

in Colorado, Illinois, Indiana, and Louisiana

Executive Summary

Higher education continues to be a key driver of economic mobility. While more students are enrolling in college than in previous decades, the price of attendance has risen sharply. The full cost of college — including tuition and fees, housing, food, transportation, required textbooks, and school supplies — is now out of reach for many families without substantial financial assistance. Not surprisingly, concerns about affordability are among the most frequently cited reasons that students decide not to pursue postsecondary education.

Financial aid is essential to narrowing this gap, but access depends on both eligibility and successful navigation of the aid system. The Free Application for Federal Student Aid (FAFSA) is the gateway to federal grants, work-study opportunities, and federal student loans, and is widely used to determine eligibility for most state and institutional aid. Yet, despite the availability of significant federal aid support, many students do not complete the FAFSA. Barriers include confusion about the application process, limited access to reliable information, fear of taking on debt, and insufficient advising capacity and support. As a result, billions of dollars in available aid go unclaimed each year.

Compounding this challenge, federal aid has not kept up with rising college costs. The purchasing power of the Pell Grant has declined significantly over time. In 1975, the Pell Grant covered more than 75% of the total cost of attendance at a public four-year college; today, it covers only about one-third. Even so, FAFSA completion is still strongly associated with higher rates of college enrollment and persistence.

In response to growing concern about unclaimed aid and declining affordability, states have increasingly turned to FAFSA completion policies. Fourteen states have implemented universal FAFSA policies requiring or strongly encouraging high school seniors to complete the FAFSA as a condition of graduation. These states are Alabama, California, Colorado, Connecticut, Illinois, Indiana, Kansas, Louisiana, Nebraska, New Hampshire, New Jersey, New York, Oklahoma, and Texas. Although Louisiana and New Hampshire have since repealed their policies, many states continue to pursue this strategy as a way to expand financial aid access and promote college-going.

This report, the second in our series on universal FAFSA policies, looks at how these policies are being implemented in four states: Colorado, Illinois, Indiana, and Louisiana. Drawing on in-depth interviews and focus groups with 15 participants — including state officials, school counselors, and principals — we identify the key supports schools need to effectively help students meet graduation requirements and access financial aid.

To ensure that universal FAFSA policies meaningfully expand access to opportunity and postsecondary pathways, and to assess their long-term impact, states should focus not only on strengthening policy design but also on thoughtful implementation. Based on our findings, state legislators, state boards, and departments of education should:

1. Provide dedicated funding to support equitable implementation of universal FAFSA policies

2. Include clear and accessible opt-out waivers for students who are unable to complete the FAFSA

3. Adopt complementary policies that promote college attendance

4. Develop user-friendly data dashboards to help in-school personnel track FAFSA completion

5. Establish accountability systems that emphasize support and continuous improvement

With deliberate design and sustained investment, universal FAFSA policies can serve as a powerful tool to increase financial aid access and expand postsecondary opportunity for students nationwide.

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By Victoria Jackson, Assistant Director of Higher Education Policy, Kyla Hurns, Higher Education Policy Analyst, and Paulina Fraser, 2024-25 Nichols Fellow

Introduction

For decades, we've told students and families in America that a college education is the surest path to upward mobility. Research shows that individuals who earn bachelor's and associate degrees have higher lifetime earnings than high school graduates.[1] Investing in higher education and increasing the number of college graduates leads to higher state GDP, creates more jobs, expands the tax base, and raises home values.[2] Despite these long-term financial benefits, the full cost of college, including tuition and fees, food, housing, transportation, books and necessary supplies, is prohibitively expensive for most students without financial aid.

The Free Application for Federal Student Aid (FAFSA) unlocks federal, state, and institutional financial aid that makes college costs more manageable. The FAFSA is used to determine eligibility for federal financial aid, which includes grants, loans, and work-study programs, and is often used to assess eligibility for state and institutional aid. The FAFSA provides access to the Pell Grant, which is the cornerstone of federal financial aid. For the 2023-24 academic year, $27.4 million in Pell Grants was allocated to 5.9 million students.[3] In addition to student aid, parents can borrow Parent PLUS loans to help pay for their child's education.

In the last decade, 14 states have implemented universal FAFSA completion policies that require, or strongly encourage, high school seniors to complete the FAFSA as a condition for high school graduation.[4]

To understand how some states and schools are implementing these policies, we conducted in-depth interviews and focus groups with 15 state officials, school counselors, and principals in Colorado, Illinois, Indiana, and Louisiana. We sought to have regional and political diversity, as well as a range of implementation experiences. Louisiana and Illinois were the first two states to adopt universal FAFSA policies; Louisiana implemented its policy in 2018 but repealed it in 2024. Colorado was selected because the participating schools were chosen through a competitive grant process, while Indiana was selected due to its statewide FAFSA completion efforts.

Building on our previous report and data dashboard, this research aims to identify the resources and supports schools need to effectively help students fulfill FAFSA completion policies. To maximize the impact of these policies, states should design them with adequate funding for college advising professionals and statewide programming.

Why the FAFSA Is Important

The FAFSA is the form used to apply for federal financial aid, which includes Pell Grants, Direct Loans, Parent PLUS loans, work-study programs, and other smaller grant programs. The FAFSA can also be used to determine eligibility for state and institutional financial aid. It uses the financial information of the student and, for dependent students, their parents to calculate the Student Aid Index. This number determines the type and amount of aid for which the student is eligible. For example, eligible low-income students can receive up to $7,395 in Pell Grants for an academic year.[5] Federal financial aid is available only to U.S. citizens and eligible noncitizens such as permanent residents (Green Card holders) and noncitizens who meet certain criteria. Due to the lack of access for undocumented students, some states have created alternative FAFSA applications to allow these students to access state and institutional aid.

Every year, college students leave billions of dollars in Pell Grants on the table by not completing the FAFSA. The National College Attainment Network (NCAN) estimates that the class of 2024 forfeited $4.4 billion in Pell Grant funds, while students in Colorado, Illinois, Indiana, and Louisiana left $62.2 million, $137 million, $85.2 million, and $63 million on the table in 2024, respectively.[6]

Despite the importance of federal financial aid, it has not kept pace with rising college costs. Over the past several decades, the price of college has surged dramatically, largely due to declining state funding for public colleges and universities.[7] This reduction in funding has forced colleges to shift the financial burden onto students and families through higher tuition.[8] In today's dollars, the average total cost of tuition, room, and board at a public four-year college was $8,984 in 1980, compared to $22,389 in 2023.[9] In 1975, the Pell Grant covered more than 75% of the total cost of attending a public four-year college; today, it covers only about one-third of that cost, making it harder for students and families to manage rising costs.[10] Despite the declining purchasing power of the Pell Grant, it remains a crucial source of financial support for students from low-income families.

FAFSA completion is associated with higher rates of college enrollment and persistence.[11] Overall, students who complete the FAFSA are 84% more likely to enroll in college, while students in the lowest socioeconomic quintile who complete the FAFSA are 127% more likely to do so. The cost of college is a major barrier for many individuals, preventing them from attending college or persisting in their studies. While college remains unaffordable for many, even with financial aid, the aid unlocked by the FAFSA can make college more affordable.

Overview of FAFSA Completion Policies in Colorado, Illinois, Indiana, and Louisiana

The design of universal FAFSA completion policies varies by state, but most share similar elements. There are three main components of these policies: who is responsible for fulfilling the requirement, whether an opt-out waiver is available, and whether funding is provided to local education agencies (LEAs) to assist schools in supporting students completing the FAFSA. States also differ in whether their policies were created through regulation or by statute. Additionally, there are variations in the statewide supports available to promote college enrollment among high school students. Colorado, Illinois, Indiana, and Louisiana each have distinct designs for their policies and different statewide supports.

Colorado

Colorado adopted its FAFSA completion policy in 2021. House Bill 21-1330 created the Fund My Future program, a competitive grant program designed to support local education agencies (LEAs) that require completion of the FAFSA or the Colorado Application for Student Financial Aid (CASFA) for high school graduation. The grant was funded by a portion of the $3.8 billion Colorado received from the American Rescue Plan Act. The Colorado Opportunity Scholarship Initiative (COSI) was awarded $1.5 million to assist LEAs in implementing strategies to increase FAFSA completion.[12]

In 2022, COSI awarded $2.2 million to 11 high schools in seven Colorado school districts to provide college-going support and increase the number of students completing the FAFSA before graduation.[13] These funds enabled schools to hire more school counselors, including college and financial aid specialists, provide training for existing school counselors, partner with local college access organizations, and organize FAFSA completion nights. Colorado's policy includes an opt-out provision. Funding for the grant will end on June 30, 2026.

Illinois

Illinois' HB 2719, which made FAFSA completion a graduation requirement, was signed into law in August 2019 and took effect for the class of 2021. The State Board of Education is authorized to adopt additional rules related to this graduation requirement; however, Illinois has not appropriated any funds for the universal FAFSA completion policy. Instead, the state relies on the Illinois Student Assistance Corps (ISACorps), a statewide group of college access advisers established by the Illinois Student Assistance Commission (ISAC) who work in high schools and community settings. For fiscal year 2025, Illinois appropriated $7.84 million for ISACorps.[14] Illinois has an opt-out policy.

Indiana

Indiana's universal FAFSA completion policy became law in April 2023.[15] This law requires high school seniors to complete and submit a FAFSA by April 15th of their senior year. The requirement applies to the class of 2024 and is set to expire on June 30, 2033. Students can opt out of this requirement. Indiana has not allocated any funds for the policy.

The state has also implemented policies requiring schools to provide information to students and families about the FAFSA and its benefits, Indiana's state financial aid programs, and labor market trends and employment opportunities in the state. It's important to note that Indiana's policy does not include funding for high schools or support to assist in its implementation.

Louisiana

Louisiana was the first state to implement a universal FAFSA completion policy in 2018.[16] The State Board of Education created this regulation to make completing the FAFSA or the Taylor Opportunity Program for Students (TOPS) application a graduation requirement for state aid. However, no funds were appropriated for this policy, and students were allowed to opt out. If a student chose not to complete the FAFSA or to opt out, the LEA could petition the state superintendent for a waiver. In March 2024, the State Board of Education repealed this policy, despite increases in FAFSA completion rates.[17]

Key Findings

We conducted 15 interviews and focus groups with state officials, school administrators, school counselors, and college and career advisers about their experiences with FAFSA policies before and after implementation. Their stories offer insights into both the benefits and impacts of the FAFSA requirement, as well as the challenges and tensions associated with mandating FAFSA completion as a graduation requirement for every student. Our findings are organized into five themes: programmatic implementation and best practices, funding and resource allocation, support networks, complementary policies that promote college access, and data collection.

Programmatic Implementation and Best Practices

The implementation of universal FAFSA policies has been strengthened across states through various programmatic strategies designed to increase access, reduce barriers, and provide personalized support to students and families. A common practice observed among all participants is the hosting of FAFSA workshops and community-based events by schools and state agencies. Agencies, nonprofits, and school districts routinely organize in-school workshops, evening completion sessions, and recurring events such as FAFSA Fridays, virtual FAFSA-thons, and holiday-themed activities. Schools often collaborate with state agencies, local nonprofits, community colleges, and universities to provide coordinated support for students and families.

Virtual support has also become a key practice, offering flexibility and expanding access. Various virtual tools have been utilized by states, including daily virtual office hours, online completion rooms, and on-demand virtual appointments, allowing students and families to receive individualized support. These systems enable families to seek assistance from experts regardless of work schedules, child-care needs, or transportation limitations. In addition, state agencies maintain open lines of communication with students through monitored phone lines, live chat services, dedicated email accounts, and updated FAFSA webpages. These resources are regarded as essential for ensuring that students and families have access to accurate financial aid guidance.

The success of these programs has been bolstered by incentive-based strategies that effectively motivate students to complete their FAFSA forms on time. School counselors and administrators mentioned using graduation supply vouchers, senior photos, and prom ticket raffles as incentives. **A participant from a Colorado state agency explained:** *"We partnered with organizations to have graduation supply vouchers donated … and students who completed their FAFSA by a certain date were entered into a drawing."* Many participants said that this approach received an overwhelmingly positive response, providing tangible benefits while encouraging students to take timely action on financial aid paperwork that they might otherwise postpone.

In regions with the lowest FAFSA filing and college-going rates, targeted outreach is essential. State agencies have proactively visited the most economically disadvantaged areas, working directly with local school counselors to identify barriers. *"We go to the parts of the state that are having the toughest time economically,"* **explained a leader at an Indiana state agency**. This effort includes organizing potluck-style events to encourage family participation, often in partnership with community organizations. Such outreach ensures that even the most underserved communities receive personalized support in completing the FAFSA.

Communication tools play an indispensable role in the effectiveness of these programs. School counselors and state agencies rely heavily on regular communication with parents and students, including email campaigns and text messaging systems. For instance, **an Illinois school counselor noted** that they send periodic emails reminding families about the FAFSA, outlining the initial steps to take, and guiding them in creating a Federal Student Aid (FSA) ID. These emails were sent from August through October to prepare families for the upcoming FAFSA cycle, with follow-up reminders sent regularly as the deadline approached. Text messaging platforms have also become a crucial component, with Illinois launching its own Q&A service, allowing families to text questions and receive real-time responses. **An individual from an Illinois state agency explained:** *"We [use] a text messaging platform called ISAC Q&A .... Students and families can send text message questions to us, and we answer them during normal hours."* This level of communication helps make the process more manageable and transparent for families who may find the FAFSA process overwhelming. In addition to traditional communication methods, many states have adopted virtual meeting systems, expanding their reach and accessibility. This ability to meet virtually has proven especially useful for families with busy schedules or those located in areas without easy access to in-person help.

Lastly, dedicated staff who specialize in FAFSA support are often considered essential for successful implementation. **One Illinois counselor at a rural high school shared:** *"I would also really appreciate having someone that worked directly with the FAFSA in my district. That would be awesome just because [it's not] one of my most important tasks. I do think it's important, of course, but for all that I must do, I really like to prioritize student wellness and everything first. And I do meet with a lot of kids for mental health reasons, but I agree that [it] would be nice to have more personnel."* This sentiment was echoed by several school staff members who recognized that specialized financial aid personnel are crucial to meet the growing demand for support.

Funding and Resource Allocation

The implementation of universal FAFSA polices presents significant challenges related to funding and resource allocation among schools, particularly since most states introduced the mandate without providing financial support for effectively carrying it out on the ground. Participants in interviews consistently described the policy as an unfunded mandate, emphasizing that neither schools nor state agencies received additional resources to manage the increased workload. **As one state official in Illinois explained,** *"We have high schools that are well resourced. We have high schools that are poorly resourced. So, part of the challenge has been [that] schools might [view this] as an unfunded mandate. They didn't get any money to implement this. So, now it's like another thing to do. And we are already struggling with the things we have to do."*

The unfunded nature of the mandate contributes to an increased workload for school counselors and school staff. Many schools already operate with extremely high student-counselor ratios, which may limit their capacity to provide individualized assistance with financial aid forms.[18] School counselors who participated in the study described the FAFSA as an additional responsibility to their existing duties, which include scheduling, college advising, crisis intervention, and mental health support. **One Illinois school counselor noted that the state has** *"added way too much to the plate of school counselors"* without lowering ratios or hiring additional staff to meet these increased demands. In some states, this has led to heightened stress and burnout, particularly as some families require intensive support to navigate complex financial and familial situations.

Implementation has also been hindered by significant technological and infrastructure barriers. Universal FAFSA policies assume that students and families have consistent access to computers and high-speed internet, but this is not the reality in many communities, particularly in rural and low-income areas.[19] **A state official from Louisiana emphasized,** *"It's really hard to make it a requirement when families don't have computer access at home,"* which forces schools to open computer labs during the day or host evening events where staff can assist families onsite. In states like Louisiana, persistent broadband inequities mean that many students cannot complete the FAFSA at home.[20] Another barrier is insufficient state-level training and professional development. Early guidance from states was described as "surface level," prompting school counselors to seek their own training through FSA webinars, nonprofits, personal research, or membership organizations. The absence of structured, high-quality statewide training programs has left practitioners, especially those in under-resourced districts, without the expertise needed to confidently support families.

Overall, the implementation of universal FAFSA policies is significantly shaped by funding constraints, personnel shortages, technological gaps, and uneven access to training and guidance. If these systemic issues aren't addressed, schools will struggle to carry out a complex statewide mandate with inadequate resources, potentially leading to inequitable outcomes for the students who would benefit most from financial aid.

> *Universal FAFSA policies assume that students and families have consistent access to computers and high-speed internet, but this is not the reality in many communities, particularly in rural and low-income areas*

Support Networks

High schools that adopt universal FAFSA policies should leverage support from statewide organizations that provide college access advising services. Implementing these policies can be a significant undertaking, particularly for understaffed schools with high student-to-counselor ratios and for students who have limited access to the internet and technology at home. Even well-resourced schools can benefit from the support of state agencies, nonprofits, and other partners that provide FAFSA completion support or general college access advising.

An Indiana state official noted that, *"The counselors at the schools are very, very busy. The caseloads and the number of students, [sometimes as many as] 500 students for one counselor, [are overwhelming]. Across the country, some states [are] better or worse. So, counselors in many ways were not giddy about the mandatory FAFSA, [as it is] falling on them."*

College access advising is a set of practices and strategies designed to help students successfully transition to college. This includes preparing students for college admissions exams, assisting them with college applications and the FAFSA completion process, and helping them apply for scholarships. Unlike school counselors, whose responsibilities extend beyond postsecondary planning, college advisers focus specifically on the college admissions and financial aid process. Also, only 1 in 5 high school students — approximately 11 million — attend schools with an adequate number of school counselors. Students who receive high-quality advising tend to have higher GPAs, participate more in early postsecondary opportunities, attain credentials at a higher rate, and show improved retention and persistence. They also develop a stronger college-going and occupational identity, have greater self-efficacy and motivation and a better understanding of how to leverage social capital.

The school counselors and principals we interviewed highlighted the vital support they receive from organizations like ISACorps and INvestEd. ISACorps' statewide network of college access advisers offers workshops, presentations, and one-on-one mentoring to students and families on topics such as career exploration, college selection, test preparation, scholarship searches, application completion, and the financial aid process. Each ISACorps member is assigned to a community college district in Illinois and splits their time between high school advising and community-based advising. INvestEd is a nonprofit organization that provides college access advising services throughout Indiana and offers student loans for college students. The organization hosts over a thousand college access events each year across the state.

A principal at a small, well-resourced, suburban Illinois high school talked about how ISACorps supports their students: *"[In] October, we had ISACorps here every Wednesday to meet with seniors, and they could work on the FAFSA, they could work on college applications, scholarships, [and] their college essay with our counselors and with them. So, they were here to also help. And then we also had a FAFSA night, so we were sending out information."*

When thinking about the importance of ISAC, the Illinois principal said: "I think we'd be in trouble" without ISAC, "because I wouldn't want to be answering those unique questions for families, because [there's] money tied to that. And I don't think that would be fair to anybody .... I don't think some of the families would want to ask me some of those financial questions, nor would I feel confident answer[ing] them because there are some really unique situations that come up. And I definitely don't think the FAFSA has the descriptions or the answers to those available to people. And so, I feel very blessed that we do have ISAC. So, I hope that that doesn't ever go away, at least for the next six or seven years before I retire. That would be a really bad thing for Illinois because, I think, they offer a lot of good services."

Despite the important support ISAC provides across the state, a school counselor at a rural school in Illinois worries that ISAC alone is not enough: *"While I understand that we have ISAC representatives who can help, there really aren't enough resources for individual assistance to actually help students complete the FAFSA. It's just been a lot of extra burden, a lot of extra duty, even a lot of extra stress on some of the students and their families. And the state has not provided the resources that are necessary. They haven't, for example, passed a law to lower the ratio of students to guidance counselors to have more people available. They haven't appropriated funding to have someone at each high school [who] is actually the FAFSA person."*

The experiences of this principal and school counselor highlight the need for additional support for students to fulfill the requirement; they also show that high schools with limited resources need more funding for capacity building, in addition to support from ISAC.

Complementary Policies That Promote College Attendance

Pairing universal FAFSA completion policies with other state policies like direct admissions can make FAFSA completion policies more effective at increasing college enrollment.

Direct admissions policies offer high school seniors preliminary admission to colleges based on their academic records and reduce barriers by streamlining the college admissions process and demonstrating that college is a viable option.[21] These policies are particularly important because the traditional college admissions process can be daunting and opaque, especially for first-generation college students. Students are often forced to navigate a complex web of varying application and admission requirements, a system that assumes access to social and cultural capital.[22]

Research highlights the burden this process places on students. A National Association for College Admission Counseling (NACAC) study of 1,000 high schools found that more than half of students — particularly those of color — identified applying to college as their most stressful academic experience.[23] Over 60% of Black, Latino, and Asian students reported that completing college applications was their greatest source of stress, compared to 42% of white students. Additionally, about 75% of seniors feared that a minor application error could diminish their chances of admission to college. By reducing complexity and uncertainty, direct admissions policies can remove many of these barriers for students planning to attend public colleges in their state.[24]

Illinois and Indiana have direct admissions policies. In August 2023, Indiana introduced Indiana Pre-Admissions: Your Path to College, an initiative that pre-admits students from participating high schools to participating colleges in the state. Pre-admittance is based on a student's academic record, such as GPA and test scores, at the end of their junior year. Early in their senior year, students receive letters from the Indiana Higher Education Commission listing the colleges to which they have been admitted. The colleges are also listed in the students' ScholarTrack accounts, a college admissions portal for Indiana residents. The letters also provide information on how to complete the FAFSA. To finalize the admissions process, students must apply to an institution to which they have been pre-admitted.

In June 2025, Gov. J.B. Pritzker signed House Bill 3522, which created a direct admissions program for Illinois. This legislation requires the Board of Higher Education, in collaboration with the Illinois Community College Board, Illinois Student Assistance Commission (ISAC), and the State Board of Education, to establish and administer a direct admissions program beginning in the 2027-28 academic year.[25] Of the 11 public universities in the state, nine will participate in the program. However, the University of Illinois Urbana-Campaign, the state's flagship university, and the University of Illinois Chicago will not.

A state official at an Illinois higher education agency sees a need for such programs: *"It's not just [that] you fill out the FAFSA and magically show up on a college campus. There's a lot of work that goes [into] that. We are currently in the midst of implementing a direct admissions program."*

Completing the FAFSA is an important step in the process of preparing for college. Implementing a direct admissions policy is an effective strategy to streamline the college admissions process and to move the needle on enrollment. Since Idaho became the first state to adopt this policy in 2015 for the class of 2016, it has seen gains in college enrollment. Research on Idaho's Campus Choice program found an increase of 8-15% in in-state enrollment, particularly at two-year open-access institutions.

An Idaho state official highlighted the ease of signing up for direct admissions: *"This upcoming year, we have … juniors [who can] opt in to participate in the direct admissions program. So, starting August 15th, [they] will go to our student portal, where they also go to do the opt-out waiver for the FAFSA, but they'll go in and electronically sign up to participate in the direct admit program."*

Data Collection

As states implement universal FAFSA policies, effectively collecting and tracking data is crucial to measure impact, target outreach, and support students in completing financial aid applications. Each of the states we focused on relies on different systems, partners, and reporting structures that reflect their unique resources, goals, and challenges; this variability makes state-specific tracking essential for guiding interventions. Some of the main data measures include federal and state reporting requirements, student-level and aggregated data, opt-out policies, staffing and funding metrics, and local program goals, all of which shape how progress is monitored and how outreach is prioritized.

In Colorado, the COSI grants funded by the American Rescue Plan Act serve as the backbone for monitoring. Monthly reports capture the number of students served, FAFSA/CASFA completions, opt-out waivers, staffing (FTE), and spending. Annual reports include student-level data, high school baselines, narratives, budgets, and statements of work. Program goals differ by grant type; FAFSA-only programs track completion rates while pre-collegiate programs also track enrollment. A statewide FAFSA completion tool in Colorado enables ongoing monitoring alongside grantee-reported data.

In Illinois, an ISAC-led system matches FAFSA submissions to official student rosters. This system tracks completion and opt-outs at both the student and school levels, integrates data with advising and outreach, and supports near-100% compliance goals. The state is also expanding this system to include direct admissions data, linking GPA, college applications, FAFSA completion, and admission outcomes.

Indiana uses publicly available dashboards to track FAFSA completion by county, district, and high school alongside college-going rates, focusing intensive outreach on the 32 counties with the lowest completion rates. Progress is measured relative to local baselines, and data guides family-level interventions that address cost concerns and connect students to Pell Grants and Indiana state aid, while respecting privacy by primarily relying on aggregated data for outreach.

In Louisiana, FAFSA completion is supported through a combination of legislative guidance, state agency outreach, and school-level initiatives, though it is not currently a graduation requirement. The state recently mandated that a financial aid module for students will move from recommended to required starting in the 2025-26 school year to ensure that all high school students are exposed to information about postsecondary aid. The Louisiana Board of Regents and Louisiana Office of Student Financial Assistance (LOSFA) actively support FAFSA completion through outreach and advising, including a transcript-based notification system in which participating school districts — currently about 20 — send letters to graduating seniors indicating the colleges for which they are eligible and encouraging them to complete the FAFSA.

Across all four states, challenges in data collection highlight the need to balance accountability, privacy, and practical constraints when translating FAFSA completion into meaningful postsecondary outcomes. Louisiana illustrates this tension by offering an opt-out option that allows students to complete an alternative form (such as the TOPS application) due to ongoing family privacy concerns and sensitivities around federal data sharing. Additional challenges include trust issues in historically underserved communities and reliance on aggregated rather than student-level data for outreach and interventions. States must also carefully manage sensitive student data, integrate multiple datasets for initiatives like direct admissions, and address gaps created by opt-outs. Broader challenges include aligning federal and state reporting requirements, linking FAFSA completion to enrollment outcomes, accommodating variations in district and school capacity, and addressing inconsistencies in reporting. These issues underscore the importance of combining state-level tracking with targeted communication while balancing privacy, voluntary participation, opt-outs, and accountability.

Across all four states, data tracking systems highlight the role of agencies, federal and state reporting, opt-out policies, and local contexts in shaping FAFSA completion efforts and the ongoing challenges of converting completion into postsecondary enrollment.

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Why Louisiana Repealed Its Policy

Louisiana was the first state to implement and later repeal a universal FAFSA completion policy. In March 2024, the policy, which had been in effect for six years and resulted in substantial increases in FAFSA completion, was repealed. In the wake of the repeal, state officials publicly shared reasons why the policy did not work in Louisiana. The reasons included concerns about privacy, countering the narrative that college is the best post-high school pathway, and reducing the burden on students and parents.[26]

In our conversations with state officials in Louisiana, we heard similar concerns to those discussed publicly, but we also heard that political ideology played a role. We spoke with three state officials from three different agencies. Overall, the state officials we spoke with were hesitant to talk about the repeal and were cautious when responding to questions about the reasons behind it.

When discussing the reasons for the repeal of the policy, one Louisiana state official said: *"We have had a big push from conservative contingencies about … privacy. I believe that a very strong lobby [has urged] the Department of Education to remove it as a requirement. I can't really speak to it too much, but I know that there were parents who were very unhappy that they were being forced to fill out an application where they had to include their tax information."*

A former school counselor in Louisiana who worked at an urban high school while the policy was in effect said this about the repeal: *"When it comes to privacy concerns, you can handle the Social Security aspect of it on your own. We just need an FSA ID, so you can log in. Literally, when you go to the website, no one's Social Security number is blasted across the screen. Also, the state doesn't even utilize Social Security numbers anymore when working with students. They have what's known as a Louisiana Secure ID. For TOPS eligibility, you have [a] LOSFA student ID number. I'm not privy to anyone's Social Security number."*

A state official from a different agency talked about ongoing statewide FAFSA completion efforts, even after the repeal: *"[I]n our office, it's still the same as usual. So, we continue to provide students and families with their options. As far as applying for financial aid, we still have just as many FAFSA completion workshops as [we did] prior to the mandate. So, we're still assisting with FAFSA completion. Our statewide initiatives, like FAFSA Frenzy Week, are still happening. And there was a change in our ranking this year as far as pre- and post-repeal. As of 9/12, we're actually 1,300 FAFSAs ahead of where we were last year. So, students and families are continuing to fill out the FAFSA in spite of the mandate being repealed, which we think is really great."*

Tensions Surrounding Universal FAFSA Policies

The future of universal FAFSA policies is shaped by a persistent tension: While stakeholders broadly agree that FAFSA completion is crucial for expanding college access, many question whether a universal mandate is the most effective or equitable way to achieve that goal. Concerns about unfunded mandates, blanket requirements, and statewide accountability systems that fail to reflect diverse student pathways were central themes in the interviews.

But, since affordability and the cost of college are the primary barriers for students when considering college, these policies are increasingly important in ensuring that students are aware of and have access to as much aid as possible.[27] This sentiment was echoed throughout the study by state higher education officials, school administrators, and school counselors.

In one interview, **a former counselor at a charter school in Louisiana highlighted the significance of this policy for first-generation students and those from low-income backgrounds:** *"[I]f you are first-gen, low income, [and] barely making it, your family is already robbing Peter to pay Paul, [so] tuition costs associated with higher ed [are] probably the least of your concern. But if you know that, hey, by completing this, there's a possibility that I will qualify for federal aid [a]nd then also institutional need-based aid or additional institutional aid that covers gaps, that opens an additional door for you and shows you an opportunity that you may not have considered."*

Other study participants emphasized the policy's role not just in opening doors for students but in increasing awareness about the importance of completing the FAFSA, especially in relation to postsecondary enrollment. Those aspirations go beyond just awareness and FAFSA completion. Many state officials are hopeful that the introduction of this policy will lead to increased college enrollment and completion rates, higher employment rates, and, most importantly, lower debt because of universal FAFSA policies.

Yet, despite a shared belief in the value of FAFSA completion policies, many school staff questioned the appropriateness of making them a graduation requirement. **As the director of counseling at a rural Illinois high school said:** *"I encourage families to have their student complete the FAFSA and apply for financial aid because it will benefit them ... but I do not agree that it should be a graduation requirement."* This sentiment was echoed by others who described the mandate as adding unnecessary stress to students and increasing the workload of school counselors. **A counselor at another rural Illinois high school noted that** *"we would need more resources, more professional financial aid personnel to help students and families complete their FAFSA and ease the [burden] on guidance counselors. It's an overburdened position, and this has been something else that's been added to the plate that is very difficult."*

These concerns about workload were paired with frustration about how state data systems rank schools based on FAFSA completion, with some arguing that these models fail to recognize legitimate alternatives to college enrollment. In Illinois, for example, schools receive tiered designations based on FAFSA completion rates. **As one state official explained:** *"We currently award [and] recognize schools for financial aid information excellence or financial aid application excellence. We have different [tiers]. We have a bronze, silver, gold, and platinum, and I think it's like 65%, 75%, 85%, and then 95% is [for] platinum."*

In addition to tracking growth, this ranking model often fuels competition between schools. **An assistant principal in Illinois remarked**, *"[W]hen ISAC gives out awards for silver or bronze, I get very competitive. And so, I get very angry that we have not gotten the gold."*

Others believe the system penalizes schools for students who pursue non-college pathways. *"What is inappropriate is that if I have a nice percentage of students going to serve our country in the military, there's no reason for them to apply for college financial aid,"* **one Illinois school counselor said.** *"[Y]et our school rating is [lowered] because those students opt out."*

Although state higher education officers believe these ranking systems can generate friendly competition and drive continuous improvements, several participants argued that the approach reinforces a narrow definition of postsecondary success. **One state official acknowledged these concerns and noted upcoming adjustments to better account for waivers, diverse pathways, and information sharing among families:** *"We're making a change for the class of 2026 … which is: Did you share information? So, now we're going to share information. Now we're also going to award [points for] FAFSA completions and waivers. A lot of schools felt that they were unfairly penalized … so, based on that feedback, we're like, 'OK … let's incorporate that, and maybe that'll give us more ability to include other schools."* This shift suggests that state agencies may be attempting to broaden participation and acknowledge legitimate waivers and opt-outs moving forward.

These perspectives highlight a desire for future changes to the policy that are more flexible, context-sensitive, and grounded in support. While participants overwhelmingly emphasized the importance of financial aid access, several argued that states could achieve high FAFSA completion rates by investing in resources, outreach, and personnel rather than relying on mandates. This balanced viewpoint reflects a belief that universal FAFSA policies can be effective, but only when they honor diverse student trajectories and account for the real constraints facing schools, families, and school counselors.

Compliance and Enforcement

Looking toward the future, many state higher education officials discussed immediate and long-term goals of the policy. Enforcement and compliance have been largely absent in many of the universal FAFSA policies across the country. In the states we examined, none of the policies include clear and specific enforcement procedures outlined in the legislation that created it. This has led to frustration across states as they look for ways to hold schools accountable for ensuring that students meet graduation requirements. **A director from an Illinois state agency remarked**: *"[W]e'll continue to work on the compliance issue. I think that's a key thing. I mean, we'll continue to work on getting to 100% accountability. That's, I think, a very key component of this."* These policies were designed to [increase FAFSA completion rates and connect more students to financial aid](.)[28] Without enforcement and accountability, states may not truly reap the benefits that universal FAFSA policies are designed to produce.

> *Despite a shared belief in the value of FAFSA completion policies, many school staff questioned the appropriateness of making them a graduation requirement*

Recommendations for State Policymakers

Fund Universal FAFSA Policies to Ensure Equitable Implementation

Universal FAFSA policies cannot achieve their intended goals when introduced as unfunded mandates. Participants across states and roles repeatedly emphasized that no additional funding was provided, leaving school counselors to absorb a complex new requirement without added staffing or training. This lack of investment is especially concerning, as national data shows that FAFSA completion rates are lowest in high-poverty and under-resourced districts,[29] where students face the greatest financial barriers to college. To prevent implementation gaps, states should fully fund universal FAFSA requirements.

Dedicated funding should support additional personnel trained in financial aid, expand district-level financial aid training, increase school staffing capacity, enhance technology access (devices, Wi-Fi, interpreter services), and build family outreach systems such as texting platforms and multilingual materials. Research indicates that when school counselors manage large caseloads, the time for individualized college advising, especially around financial aid and FAFSA completion, is significantly constrained, limiting students' access to the support needed to navigate the FAFSA process successfully.[30] By providing adequate funding to support universal FAFSA policies, states can ensure that the mandate expands opportunity rather than creates disproportionate burdens. This approach will ultimately lead to more consistent FAFSA completion and greater postsecondary access across communities.

Have an Opt-Out Waiver for Students Who Cannot Complete the FAFSA

Some students, such as undocumented students, are ineligible to complete the FAFSA. Others may choose to pursue post-high school paths that do not require the FAFSA. States should allow school counselors or other in-school staff to approve a student's decision to opt out of this requirement and should not penalize LEAs for schools with approved opt-outs.

Adopt Complementary Policies That Promote College Attendance

Completing the FAFSA is an important step on the path to college enrollment; however, effectively navigating the complex college application and admissions process is also necessary to attend college. States with universal FAFSA completion should consider adopting direct admissions policies to further support students.

Establish Data Dashboards for FAFSA Completion Tracking for In-School Personnel

In-school personnel should have access to information on their students' FAFSA submission and completion status. States should create user-friendly, district-level dashboards that provide school counselors and principals with data on FAFSA submissions and completions.

Establish Accountability Systems

Universal FAFSA policies are unlikely to meet their goals without clear enforcement and accountability. Participants noted that the policies often lack concrete compliance procedures, creating uncertainty and frustration for districts. Enforcement systems should incorporate clear compliance guidelines for districts, establish timelines for progress on benchmarks, and include mechanisms for documenting legitimate FAFSA

waivers. Most importantly, accountability structures should avoid punitive measures that burden under-resourced districts and instead prioritize supportive strategies that build district capacity. Dedicated resources should be allocated to support compliance efforts, including monitoring systems, technical assistance for schools struggling to meet requirements, and real-time reporting dashboards that track FAFSA completion and waiver submissions. Clear and fair accountability systems will ensure that universal FAFSA policies function as intended and increase student access to financial aid.

Methodology

This study used a qualitative case study design to examine how states and educational leaders understand and implement universal FAFSA policies in Colorado, Illinois, Indiana, and Louisiana. These states were purposely selected to explore policy design, implementation, and demographic context. Participants included state officials, district and school administrators, school counselors, teachers, and college and career advisers who work directly with FAFSA mandates or universal FAFSA initiatives. Recruitment relied on criterion and purposive sampling through state agency contacts, followed by snowball sampling to identify additional stakeholders with relevant expertise. Data was collected through semi-structured interviews with state and district leaders and focus groups with school-based practitioners; interviews typically lasted 45 to 75 minutes and focus groups 60 to 90 minutes. All sessions were conducted virtually, recorded with consent, and professionally transcribed.

Data analysis followed an iterative thematic approach. Researchers conducted initial independent coding of transcripts, collaboratively developed a shared codebook, and engaged in analytical and thematic coding to identify relationships and patterns across core themes related to policy recommendations, implementation, resources, challenges, and equity implications. Cross-case comparative analysis was used to examine similarities and differences across the four states. For data ethics and integrity, all participants provided informed consent. Identifying information was removed from transcripts, and pseudonyms or broad role descriptors were used to protect participant confidentiality.

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