

Can Simple Be Equitable?

Lessons from State Grant Programs

EXECUTIVE SUMMARY

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December 2011

Introduction

Like the federal Pell Grant program, need-based state grant programs are designed to increase access to higher education among low- and moderate-income students. A growing body of research indicates that adequate funding is a necessary but not sufficient condition for successfully achieving this goal. Aid programs that are easy to understand and apply for are more effective than the same dollars devoted to more complex, less predictable programs.

Consistent with this evidence, the federal government has taken steps to simplify the Free Application for Federal Student Aid (FAFSA) and to make it easier for students and families to provide the required information. Some questions have been eliminated from the form, and others are likely to follow.

The Student Aid and Fiscal Responsibility Act of 2009 (HR3221) would have eliminated from the FAFSA all financial information not available from the IRS. President Obama's FY2012 budget included a similar proposal. Given a recent innovation which makes it possible for many FAFSA filers to transfer financial data directly from their federal tax forms to the FAFSA, such a change would make it much easier for students and families to file the FAFSA. It would, however, also modify Federal Methodology (FM) calculations of Expected Family Contributions (EFCs) and would remove some FAFSA data elements currently available to states and institutions for determining eligibility for their grant programs.

To assist states in preparing for these developments, the College Board, with support from Lumina Foundation for Education, undertook an effort to estimate the effects of these potential changes.

State Grant Simplification Study Simulations

The College Board collaborated with and collected data from five states — Kentucky, Minnesota, Ohio, Texas, and Vermont. These states were selected because of their commitment to need-based grant aid, their interest in a simpler student aid system, and their comprehensive and accessible data. These states also represent a variety of approaches to determining eligibility for and allocating state grants. This diversity allowed us to study the impact of FAFSA simplification in a range of systems and to provide examples for other states with policies and approaches resembling one or more of those studied.

Each of the pilot states, after removing personally identifiable information from student records, provided 2007-08 and/or 2008-09 FAFSA, grant award, and enrollment data to the College Board for modeling purposes. With assistance from researchers at the University of Michigan, the College Board simulated the impact of potential data and formula changes on state grant eligibility with the goal of providing estimates of fiscal and distributional impacts to each state.

State Characteristics

Each of the five states studied differs in terms of the financial characteristics of the state, the postsecondary student population in 2007-08 and 2008-09, and the structure and funding level of the state grant program.

- Family income levels in Vermont and Minnesota are higher than those in the other states in the analysis.
- Whereas over half of Ohio College Opportunity Grant (OCOG) recipients were enrolled part-time, Texas funds only students enrolled at least three-quarter time; the Vermont Grant program analyzed in this study requires recipients to be enrolled full-time.
- Seventy-nine percent of OCOG recipients were independent. In contrast, because Texas requires TEXAS Grant recipients to enroll in college within 16 months of high school graduation, relatively few independent FAFSA filers are eligible.
- Kentucky, Ohio, and Texas set maximum EFC cut-offs for aid eligibility.
- Ohio has a maximum income cutoff of \$75,000 for aid eligibility.
- Texas and Ohio institutions have discretion in distributing grant funds, within the constraints specified by the state (i.e., a decentralized awarding model), whereas the other states in the study determine the awards centrally.
- The Minnesota State Grant Program utilizes a “shared responsibility” formula, assigning a percentage of the cost of attendance to be covered by the student and the remaining portion to be shared by the family, federal, and state governments.
- Minnesota adjusts its formula to ration limited funds, while Kentucky, Ohio, and Texas appear to operate on a first-come, first-served basis, funding students who have completed the FAFSA before the money runs out.¹
- Unlike the other states, Vermont bases its determination of need on a combination of data from the FAFSA and additional information (such as home equity and noncustodial parent resources) collected separately. Vermont is also unique among the states studied in that it funds residents enrolled in out-of-state institutions.

As a result of these differences, the impact of relying on fewer data elements to calculate Expected Family Contributions was somewhat different in each state. However, the patterns and the general outcomes are the same.

¹ The first-come, first-served policy in Texas applies to students enrolled in public institutions, but not to those enrolled in private colleges and universities.

Simulations

Using FAFSA data for individual state residents who enrolled at in-state public or private colleges and universities (and those enrolled elsewhere but eligible for state grants), we estimated Expected Family Contributions, Pell Grant awards, and state grant eligibility under several different scenarios.²

- **Simulation 1** compared the estimated 2007-08 award patterns to the patterns that would emerge for the same students under a need analysis formula that is similar to the 2010-11 FM. The key change was the 2009-10 removal of FAFSA Worksheet A, which previously collected information on earned income credits, additional child tax credits, welfare benefits, and untaxed social security benefits. The removal of FAFSA Worksheet A in 2009-10 reduced EFCs for many students and families and served as the baseline against which to compare the results of additional simulations.
- **Simulation 2** eliminated assets in addition to Worksheet A data from the formula.
- **Simulation 3** removed data on untaxed income and income adjustments (FAFSA Worksheets B and C).
- **Simulation 4** examined the effect of relying only on a small number of data elements available on income tax forms: Adjusted Gross Income (AGI), federal taxes paid and number of exemptions.³

The general results of these simulations showed that removing information about assets and components of income not included on federal income tax forms would lower EFCs, but would have a relatively small effect on eligibility for Pell and the state grant programs in the analysis.

- Assets are currently excluded from the Federal Methodology for most low- and moderate-income students. Those that are included have little impact on EFCs. Thus, the removal of assets would not substantially affect EFCs for students from families at these income levels.
- Large declines in EFC would occur at relatively high income levels – in most cases for students whose resources make them ineligible for either Pell or state need-based grants.
- Relying on a small number of data elements available from the IRS would affect filers differently, based on dependency status and household income. Because we could not capture wage information, we could not differentiate between one- and two-earner households for purposes of calculating the employment expense allowance (which reduces EFCs for two-earner families and employed heads of households).⁴ The absence of this allowance increases EFCs for some FAFSA filers, partially offsetting the reduced EFCs generated by the other simulations.

² Vermont residents enrolled in out-of state institutions are eligible for state grants.

³ We also incorporated information on number in college from the FAFSA.

⁴ The employment expense allowance in the existing Federal Methodology reduces expected contributions for two-earner families for all dependency categories and employed single heads of dependent and independent students with dependents households to compensate for the expenses associated with working and with the purchase of household services.

Specific Findings of Simulations

Simulation 2 — Eliminating assets from the current formula.

- Removing assets from the formula would lead to an increase of 0.6 to 1.8 percentage points in the share of FAFSA filers in each state eligible for Pell Grant.
 - Increases in Pell eligibility range from \$21 per dependent filer at public institutions in Texas to \$83 for full-time dependent students in Vermont.
- Removing assets would lead to an increase of 0.6 to 1.4 percentage points in the proportion of filers eligible for state grant programs in the study.
 - Increases in state grant eligibility range from \$8 per dependent filer in Minnesota to \$64 in Vermont.
 - Increases in eligibility for state grants would be less than \$10 per independent applicant (increases in Pell eligibility would be only slightly larger).

Simulation 4 — Relying only on a small number of data elements available on income tax forms.

- Relying only on AGI, federal taxes paid, and number of exemptions (family size) from the IRS would lead to changes ranging from a decline of 0.3 to an increase of 1.1 percentage points in the proportion of FAFSA filers in each state eligible for Pell grants
 - Changes in Pell eligibility range from a decline of \$33 per dependent filer at public institutions in Texas to an increase of \$45 for full-time dependent students in Vermont.
- Using this “IRS Data Only” model would lead to changes ranging from a decline of 0.5 to an increase of 2.0 percentage points in the share of filers eligible for state grants.
 - Changes in state grant eligibility for dependent students range from a loss of \$6 in Minnesota to an increase of \$51 in Vermont.
- Eligibility for Pell and state grants would decline slightly for independent students with dependents and — with the exception of Kentucky — increase somewhat for independent students without dependents.

Additional Potential Formula Modifications

Even small changes to state grant eligibility could create problems for tight state budgets. In order to address this issue, we modeled the impact of combining the simulated data changes with small changes to the FM formula. The assessment rates and the income brackets to which those rates apply in the current system are somewhat arbitrary and changing them would not necessarily make the outcomes any less representative of actual financial capacity.

Our simulations demonstrate that raising each assessment rate by 2 or 3 percentage points or combining the two lowest rates and slightly narrowing the income brackets would effectively counteract the effect of more limited data on calculated EFCs.

In other words, the federal government could simplify the FAFSA and the formula for calculating EFCs without generating significant increased measured need for aid applicants.

The Impact on Institutions

As discussed above, calculated EFCs for students from families with incomes greater than \$75,000 in 2007-08 would have fallen enough to generate significant increased eligibility for need-based aid programs that extend up the income scale, as is the case at many institutions – particularly in the private nonprofit sector.

A formula which includes additional data elements available from federal income tax forms could generate EFCs comparable to current ones. In order to demonstrate this possibility, we developed a methodology similar to the current FM, but using only data available on income tax forms. While there are numerous options for constructing such a formula, for this purpose we added back business losses and imputed asset values from interest and dividend information. Simulations of this formula reveal that it can generate EFCs similar to those produced by the current FM.

Conclusion

Eliminating information from the FAFSA that is not available from the IRS and relying only on AGI and federal taxes paid would measurably reduce calculated EFCs only at the upper end of the income distribution of filers. These modifications would lead to relatively small changes in eligibility for the state grant programs studied in this analysis. Further, these types of changes could result in federal and state grant application and eligibility systems that are simpler and more predictable for filers.

If desired, the reduced EFCs generated by the removal of assets and use of limited IRS data could be counteracted through minor modifications to the assessment rate structure in the Federal Methodology and/or by creating a more robust formula which includes more data elements from the IRS.

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Impact of Eliminating Assets Dependent Applicants

	Current FM (No Worksheet A)		Eliminating Assets		Average Net Change by Income		
	Average per Filer	% Eligible	Average per Filer	% Eligible	<\$15,000	\$45,000 to \$60,000	>\$75,000
Kentucky							
EFC	\$10,092		\$9,178		-\$119	-\$636	-\$2,080
Pell	\$1,249	42.5%	\$1,285	43.7%	+\$44	+\$45	+\$2
State	\$684	42.1%	\$703	43.2%	+\$8	+\$44	+\$1
Minnesota							
EFC	\$12,626		\$11,276		-\$242	-\$814	-\$2,540
Pell	\$864	32.8%	\$914	34.6%	+\$86	+\$68	+\$1
State	\$1,214	51.8%	\$1,222	53.0%	-\$46	+\$53	+\$11
Ohio (4-yr.publics)							
EFC	\$3,795		\$3,286		-\$200	-\$769	n/a
Pell	\$1,823	59.2%	\$1,902	61.7%	+\$75	+\$70	n/a
State	\$877	46.2%	\$922	48.1%	+\$76	+\$13	n/a
Texas (publics)							
EFC	\$8,622		\$7,962		-\$73	-\$414	-\$1,946
Pell	\$1,913	55.5%	\$1,934	56.1%	+\$27	+\$33	+\$2
State	\$1,698	55.1%	\$1,727	55.8%	+\$14	+\$78	+\$4
Vermont							
EFC	\$13,486		\$11,608		-\$468	-\$1,164	-\$3,181
Pell	\$954	32.0%	\$1,037	34.3%	+\$194	+\$67	+\$1
State	\$1,102	51.0%	\$1,166	52.9%	+\$30	+\$143	+\$23

Impact of Eliminating Assets Independent Applicants without Dependents

	Current FM (No Worksheet A)		Eliminating Assets		Average Net Change by Income		
	Average per Filer	% Eligible	Average per Filer	% Eligible	<\$15,000	\$45,000 to \$60,000	>\$75,000
Kentucky							
EFC	\$4,661		\$4,515		-\$55	-\$444	-\$2,136
Pell	\$1,684	61.3%	\$1,693	61.7%	+\$15	+\$0	+\$5
State	\$874	59.7%	\$879	60.0%	+\$5	+\$0	+\$2
Minnesota							
EFC	\$5,997		\$5,688		-\$100	-\$725	-\$3,413
Pell	\$1,164	50.1%	\$1,178	50.6%	+\$25	+\$0	n/a
State	\$948	65.3%	\$957	65.8%	+\$3	+\$4	n/a
Ohio (4-yr.publics)							
EFC	\$3,618		\$3,493		-\$122	-\$31	n/a
Pell	\$1,874	64.2%	\$1,887	64.7%	+\$12	+\$6	n/a
State	\$983	54.0%	\$991	54.4%	+\$7	+\$7	n/a
Texas (publics)							
EFC	\$2,734		\$2,663		-\$13	-\$723	-\$835
Pell	\$2,860	77.7%	\$2,865	77.9%	+\$6	n/a	n/a
State	\$1,843	77.2%	\$1,848	77.3%	+\$6	n/a	n/a
Vermont							
EFC	\$5,306		\$4,948		-\$160	-\$1,160	-\$8,349
Pell	\$1,776	54.7%	\$1,799	55.5%	+\$36	+\$0	n/a
State	\$978	35.6%	\$987	35.8%	+\$14	+\$0	+\$0

Impact of Eliminating Assets Independent Applicants with Dependents

	Current FM (No Worksheet A)		Eliminating Assets		Average Net Change by Income		
	Average per Filer	% Eligible	Average per Filer	% Eligible	<\$15,000	\$45,000 to \$60,000	>\$75,000
Kentucky							
EFC	\$1,724		\$1,704		+\$0	-\$37	-\$265
Pell	\$2,585	86.6%	\$2,586	86.7%	+\$0	+\$5	+\$0
State	\$1,166	83.0%	\$1,167	83.1%	+\$0	+\$4	+\$0
Minnesota							
EFC	\$2,194		\$2,155		-\$1	-\$76	-\$345
Pell	\$2,003	82.5%	\$2,006	82.6%	+\$1	+\$6	+\$0
State	\$742	78.6%	\$743	78.6%	-\$1	+\$7	+\$1
Ohio (4-yr.publics)							
EFC	\$992		\$976		-\$16	+\$0	n/a
Pell	\$2,822	90.2%	\$2,825	90.4%	+\$3	+\$0	n/a
State	\$1,538	83.8%	\$1,538	83.9%	+\$1	+\$0	n/a
Texas (publics)							
EFC	\$630		\$625		+\$0	-\$5	-\$341
Pell	\$3,910	95.8%	\$3,911	95.8%	+\$0	+\$0	n/a
State	\$1,859	95.7%	\$1,859	95.7%	+\$0	+\$0	n/a
Vermont							
EFC	\$2,390		\$2,319		-\$2	-\$146	-\$675
Pell	\$2,635	78.1%	\$2,640	78.2%	+\$2	+\$8	+\$0
State	\$965	34.5%	\$967	34.5%	+\$0	+\$17	+\$0

Impact of Using Only Data Available from IRS Dependent Applicants

	Current FM (No Worksheet A)		IRS Data Only		Average Net Change by Income		
	Average per Filer	% Eligible	Average per Filer	% Eligible	<\$15,000	\$45,000 to \$60,000	>\$75,000
Kentucky							
EFC	\$10,092		\$9,099		-\$150	-\$532	-\$2,515
Pell	\$1,249	42.5%	\$1,232	42.5%	+\$60	-\$66	-\$6
State	\$684	42.1%	\$684	42.1%	+\$11	-\$40	-\$3
Minnesota							
EFC	\$12,626		\$10,976		-\$304	-\$840	-\$3,323
Pell	\$864	32.8%	\$887	33.8%	+\$118	-\$14	-\$2
State	\$1,214	51.8%	\$1,208	52.3%	-\$45	+\$3	-\$14
Ohio (4-yr.publics)							
EFC	\$3,795		\$3,506		-\$236	-\$555	n/a ⁵
Pell	\$1,823	59.2%	\$1,815	59.4%	+\$91	-\$45	n/a
State	\$877	46.2%	\$872	45.8%	+\$89	-\$16	n/a
Texas (publics)							
EFC	\$8,622		\$7,731		-\$99	-\$515	-\$2,756
Pell	\$1,913	55.5%	\$1,880	55.7%	+\$45	-\$95	-\$4
State	\$1,698	55.1%	\$1,715	55.2%	+\$21	-\$77	-\$95
Vermont							
EFC	\$13,486		\$11,107		-\$604	-\$1,269	-\$4,295
Pell	\$954	32.0%	\$999	33.5%	+\$257	-\$49	-\$3
State	\$1,102	51.0%	\$1,153	53.7%	+\$41	+\$74	+\$15

⁵ Ohio data file did not include students from families with incomes over \$75,000.

Impact of Using Only Data Available from IRS Independent Applicants without Dependents

	Current FM (No Worksheet A)		IRS Data Only		Average Net Change by Income		
	Average per Filer	% Eligible	Average per Filer	% Eligible	<\$15,000	\$45,000 to \$60,000	>\$75,000
Kentucky							
EFC	\$4,661		\$4,615		-\$132	+\$314	-\$2,691
Pell	\$1,684	61.3%	\$1,676	60.9%	+\$41	-\$5	n/a
State	\$874	59.7%	\$867	59.3%	+\$19	-\$4	n/a
Minnesota							
EFC	\$5,997		\$5,674		-\$357	-\$120	-\$3,375
Pell	\$1,164	50.1%	\$1,200	51.0%	+\$117	-\$6	n/a
State	\$948	65.3%	\$950	65.5%	+\$20	-\$27	n/a
Ohio (4-yr.publics)							
EFC	\$3,618		\$3,570		-\$34	-\$77	n/a
Pell	\$1,874	64.2%	\$1,885	64.3%	+\$8	+\$19	n/a
State	\$983	54.0%	\$998	54.6%	+\$13	+\$33	n/a
Texas (publics)							
EFC	\$2,734		\$2,544		-\$206	-\$175	-\$1,356
Pell	\$2,860	77.7%	\$2,935	78.7%	+\$123	n/a	n/a
State	\$1,843	77.2%	\$1,871	78.3%	+\$49	n/a	n/a
Vermont							
EFC	\$5,306		\$4,888		-\$373	\$-461	-\$8,719
Pell	\$1,776	54.7%	\$1,821	56.1%	+\$114	-\$29	n/a
State	\$978	35.6%	\$980	35.8%	+\$20	-\$5	n/a

Impact of Using Only Data Available from IRS Independent Applicants with Dependents

	Current FM (No Worksheet A)		IRS Data Only		Average Net Change by Income		
	Average per Filer	% Eligible	Average per Filer	% Eligible	<\$15,000	\$45,000 to \$60,000	>\$75,000
Kentucky							
EFC	\$1,724		\$1,805		-\$4	+\$327	-\$288
Pell	\$2,585	86.6%	\$2,532	85.9%	+\$3	-\$158	n/a
State	\$1,166	83.0%	\$1,156	82.3%	+\$0	-\$119	n/a
Minnesota							
EFC	\$2,194		\$2,264		-\$8	+\$235	-\$314
Pell	\$2,003	82.5%	\$1,947	81.8%	+\$5	-\$143	-\$5
State	\$742	78.6%	\$731	77.4%	+\$0	-\$53	-\$16
Ohio (4-yr.publics)							
EFC	\$992		\$1,118		+\$127	+\$191	n/a
Pell	\$2,822	90.2%	\$2,758	88.9%	-\$65	-\$53	n/a
State	\$1,538	83.8%	\$1,489	81.6%	-\$49	-\$63	n/a
Texas (publics)							
EFC	\$630		\$666		-\$5	+\$296	-\$775
Pell	\$3,910	95.8%	\$3,861	95.7%	+\$1	-\$200	n/a
State	\$1,859	95.7%	\$1,857	95.6%	+\$1	-\$94	n/a
Vermont							
EFC	\$2,390		\$2,386		-\$7	\$19	-\$954
Pell	\$2,635	78.1%	\$2,584	77.0%	+\$6	-\$143	-\$17
State	\$965	34.5%	\$961	34.4%	+\$0	-\$19	+\$4

Kentucky

- To be eligible for a state grant, the applicant's EFC could not exceed \$4,110 (in 2007-08), and the student must enroll for a minimum of 6 semester hours. The grant is awarded by the state on a "first-come, first-served" basis.
- 14% of dependent filers came from families with incomes below \$15,000; 30% came from families with incomes over \$75,000. The average family income for full-time dependent applicants was \$62,487.
- 55% of independent filers without dependents and 47% of independent filers with dependents reported incomes below \$15,000.
- 49% of Kentucky filers in the study were dependent.

Minnesota

- Eligibility for the state grant program is based on the state's "Design for Shared Responsibility," under which students, their families, and if necessary, state and federal taxpayers share the responsibility for paying for college. The grant is awarded by the state.
- The amount of the award is based on the type of school the student attends and the student's enrollment status. Students enrolled for at least 15 credit hours receive the full grant amount, while others receive 1/15th of the full amount for each credit hour of enrollment.
- 10% of dependent filers came from families with incomes below \$15,000; 39% came from families with incomes over \$75,000. Average family income for full-time dependent applicants was \$74,495.
- 46% of independent filers without dependents and 38% of independent filers with dependents reported incomes below \$15,000.
- 65% of Minnesota filers in the study were dependent.

Ohio

- To be eligible for a state grant, the applicant's EFC could not exceed \$2,190, and the award amount depended on the type of institution in which the student was enrolled as well as the student's enrollment status. The grant is awarded by institutions on a first-come, first-served basis.
- Ohio provided data for all FAFSA filers with incomes up to \$75,000 who enrolled in public two- and four-year institutions. For students enrolled in private nonprofit and for-profit institutions, only state grant recipient data were available. As a result, it is difficult to compare Ohio applicant data and simulation results to those of the other states in our study.
- Of the dependent filers enrolled in public four-year institutions, 18% came from families with incomes below \$15,000; 16% came from families with incomes between \$60,000 and \$75,000. Average family income for full-time dependent applicants enrolled in four-year public institutions was \$37,097.
- 94% of independent filers without dependents and 99% of those with dependents who were enrolled in public four-year institutions reported incomes below \$15,000.
- 22% of state grant recipients were dependent; 24% were independent without dependents; 55% were independent with dependents.

Texas

- The state has separate need-based grant programs for students enrolled in public and private institutions (TEXAS Grant and Tuition Equalization Grant, respectively). The data provided in the tables above represent full-time first-year filers enrolled in public four- and two-year institutions.
- To be eligible for a TEXAS Grant, the applicant's EFC could not exceed \$4,000 (in 2007-08), and the student must be enrolled at least three-quarter time. The grant is awarded by institutions, which make their own decisions as to which students should receive the grant, as long as the basic eligibility requirements are met. The maximum award varies by type of institution.
- To be eligible for a TEXAS Grant, students must enter public higher education within 16 months of high school graduation. As a result, only 4% of the independent students with dependents and 11% of the independent students without dependents who met the need criteria received a TEXAS Grant.
- Of the dependent applicants, 16% came from families with incomes below \$15,000; 26% came from families with incomes over \$75,000. Average family income for full-time dependent filers was \$54,022.
- 75% of independent filers without dependents and 60% of those with dependents reported incomes less than \$15,000.

Vermont

- The state awards grant based on a need analysis formula that differs from the Federal Methodology. Using data collected on separate forms, the grant agency supplements federal data with information about small business and farm ownership, home equity, noncustodial parent financial resources. In addition, the agency adjusts the outcomes of the formula using professional judgment for many students. However, the data in the tables above include only information available on the FAFSA and the results reflect current FM.
- To be eligible for a state grant, the parent or student contribution cannot exceed \$20,900, regardless of the student's financial need. The eligibility formula takes into account the student's cost-of-attendance, Pell Grant, parent contribution and student's assets if dependent, student contribution if independent, and any tuition waiver the student may have received. The student must be enrolled full-time at an eligible institution, which can be located in Vermont or outside the state, including in Canada.
- 9% of the dependent applicants came from families with incomes below \$15,000; 40% came from families with incomes over \$75,000.
- 73% of Vermont applicants were dependent. Average family income for those enrolled in-state was \$67,310 and for those enrolled outside Vermont was \$74,672.

State Grant Simplification Study Sponsors

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About Lumina Foundation for Education

Lumina Foundation for Education is an Indianapolis-based private foundation which strives to help people achieve their potential by expanding access to and success in education beyond high school. Through grants for research, innovation, communication, and evaluation, as well as policy education and leadership development, Lumina Foundation addresses issues that affect access and educational attainment among all students, especially underserved student groups such as minorities, students from low-income families, first-time college-goers, and working adults. The Foundation believes postsecondary education is one of the most beneficial investments individuals can make in themselves and that a society can make in its people. For further information, visit www.luminafoundation.org.