



# Supporting State Financial Aid Policy Development in Dynamic Times

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## Key Takeaways

- **State financial aid systems are deeply and intentionally integrated with the FAFSA.** Approximately 70% of the reviewed state student aid programs require the FAFSA, collectively serving more than 4.3 million students and disbursing roughly \$15 billion annually. State aid programs use a variety of FAFSA data, including SAI, citizenship status, state residency, FAFSA completion date, and loan default status.
- **When the federal infrastructure falters, states bear the cost.** The FAFSA simplification exposed significant operational vulnerabilities that states adapted to. In addition, the removal of data elements from the FAFSA created genuine gaps for state aid administrators.
- **States have adopted varied approaches to alternative applications to the FAFSA,** including dual systems, layered applications, and program-specific alternatives. These choices reflect different levels of insulation from federal volatility and carry real trade-offs in student burden and administrative complexity.
- **The existing alignment between state aid systems and the FAFSA is worth preserving.** As ED and FSA consider redesigning federal financial aid processes, policymakers should carefully weigh the downstream consequences for states. For states, thinking about the explicit trade-off between the efficiency of federal alignment and the flexibility of independent capacity is important.

*The FAFSA is perhaps a prime example of how federal and state collaboration can yield significant positive returns for students, and, by extension, states and the nation.*

# Introduction and Background

Over the past 50 years, state financial aid programs have expanded significantly, from \$1.9 billion in 1970<sup>[1]</sup> to over \$18 billion in 2024, measured in constant 2026 dollars. This growth in state investment in financial aid is likely driven by several factors, including a growing college-going population, rising tuition, and changes in states' capacities to invest in higher education over a 50-year period, among other factors. At the same time, this growth was intentionally incentivized and supported by the federal government. This happened through the creation of programs such as the State Student Incentive Grant (SSIG) in 1972,<sup>[2]</sup> which provided matching incentives for states to offer need-based grant programs. It also happened through the creation of the Free Application for Federal Student Aid, or FAFSA, which has roots stretching back to 1986.<sup>[3]</sup>

The creation of the FAFSA provided a common way for the federal government, states, and postsecondary institutions to assess students' financial needs. Today, this common assessment of financial need, as measured by the Student Aid Index (SAI), still forms the foundation of many states' approaches to allocating student financial aid. As shown later in this study, approximately 70% of state aid programs require the FAFSA. This common form for state- and federal-level need assessment streamlines the student application process, enhances predictability for students applying to multiple need-based programs, and saves states significant administrative costs. Even today, many states' aid programs are structured to award support to students who meet criteria that states can only reasonably collect through the FAFSA, such as default status on previous student loans, state of residency, incarceration status, and other characteristics.

## *State Financial Aid Programs*

**1970 | \$1.9 Billion**

**2024 | \$18 Billion**

## *State Aid Programs Requiring FAFSA*

**70%**

[1] [NASSGAP 1970-71 Comprehensive State Scholarship/Grants Program Questionnaire Findings](#)

[2] [Lumina Foundation A History of Federal Student Aid Chapter 2: Where Financial Aid Began](#)

[3] [Lumina Foundation A History of Federal Student Aid Chapter 4: How the Federal Government Distributes Aid to Students](#)

Over the past year, the Office of Federal Student Aid (FSA) has undergone significant staffing cuts and reorganization. Proposals to relocate FSA functions to other government agencies are under active consideration or implementation, such as the impending transition of student loan functions to the Department of the Treasury. Indeed, U.S. Secretary of Education Linda McMahon has indicated a desire to “return education to the states” by significantly reducing the size and scope of the federal Department of Education (ED).[4] Amid these changes, the durability of federal and state alignment through the FAFSA form may be in jeopardy.

Key functions like the timely, predictable availability of the FAFSA form and accurate SAI calculations have already compromised FSA’s reliability with state financial aid professionals.[5] For example, in April of 2024, West Virginia Gov. Jim Justice declared a state of emergency over malfunctions and problems students experienced with FAFSA filing. As a result, he temporarily suspended the requirement that students complete the FAFSA to qualify for the state’s financial aid programs.[6]

Since then, application processes have improved, and the 2025-26 FAFSA cycle saw a meaningful recovery in submission and processing timelines. Even so, the disruptions of the previous cycle revealed the degree to which state financial aid programs depend on FSA infrastructure and how little insulation many states have when that infrastructure changes. As new roles and responsibilities within ED and FSA are proposed and implemented, this research seeks to elevate the importance of the FAFSA form itself. It also examines the extent to which states are voluntarily dependent on a federal process that supports the successful delivery of billions of dollars to millions of students each year. In our research, NCHEMS learned that the FAFSA is perhaps a prime example of how federal and state collaboration can yield significant positive returns for students, and, by extension, states and the nation.

Indeed, without a sustained partnership with FSA, states risk losing access to the data and processing infrastructure on which their programs rely. Changes in this partnership may cause states to locate new resources to create their own duplicative application processes, adding steps and confusion for students during the college application process. Alternatively, states could fall back on criteria that are more readily available, such as test scores or class ranks, thereby compromising college access for most students facing affordability challenges.

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[4] [U.S. Department of Education Press Release: “Secretary McMahon Announces ‘Returning Education to the State’ 50-State Tour](#)

[5] [Knox, L. \(2024, March 22\). ‘Another Unforced Error’ in the FAFSA Fiasco. Inside Higher Ed.](#)

[6] [West Virginia Higher Education Policy Commission. \(2024, April 30\). Gov. Justice declares state of emergency, suspends FAFSA requirements for WV students applying for state financial aid programs for college this year.](#)

To examine the key aspects of the FAFSA states rely on the most and the strategies states have employed to maintain continuity in aid administration, this project employed two complementary methods. First, the project team conducted an inventory of the FAFSA components that states rely on by reviewing state higher education and state financial aid agency websites to develop an initial inventory of state aid programs. This inventory was then cross-referenced with the National Association of State Student Grant and Aid Programs' (NASSGAP) 2023-24 survey data to identify additional programs, resulting in approximately 600 programs. To narrow the scope, the team removed graduate aid programs, loan and loan-repayment programs, aid related to the National Guard, military, or surviving dependent students, and programs disbursing less than \$100,000. This left 381 programs. For those 381 programs, the team then reviewed statutory language to complement the publicly available information from state aid programs and state higher education agency websites.

Second, the project team conducted a focus group of state grant aid administrators who were members of NASSGAP. Twenty-nine NASSGAP members participated in the hour-long, semi-structured focus group.<sup>[7]</sup> This focus group not only expanded the findings from the national scan but also raised discussion of aspects of state aid administration that were not documented in written policy.

The findings from the national scan and the focus group are organized into four themes: 1) how states use federal financial aid data, 2) state data delivery infrastructure, 3) lessons from the FAFSA redesign, and 4) alternative and supplemental applications.



<sup>[7]</sup> The focus group was held virtually on March 10, 2026.

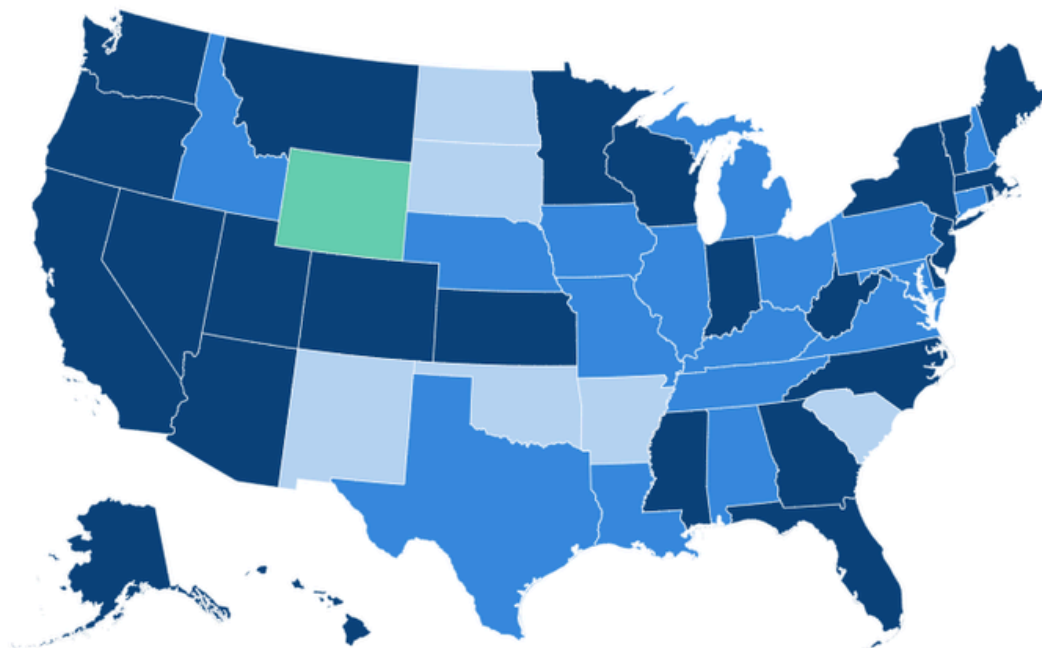
# How States Use Federal Financial Aid Data

The findings from the statute and policy scan underscore the centrality of federal data to state aid administration. **Approximately 70% of reviewed programs require the FAFSA, collectively serving more than 4.3 million students and disbursing roughly \$15 billion annually.**[8] Twenty-six states had most of the reviewed programs require the FAFSA, accounting for approximately \$9 billion of the \$15 billion in state aid distributed. Seventeen states had some programs that required the FAFSA, while only six states had a few programs that did. Wyoming had only one state aid program, which didn't require the FAFSA. A map showing the state's share of state aid programs requiring the FAFSA is provided in Figure 1. Of these programs, 13% do not list the FAFSA as a statutory requirement but still rely on FAFSA data operationally.[9]

## Figure 1: Share of State Aid Programs Requiring the FAFSA, by State

Categorized by share of 381 programs reviewed with the FAFSA requirements.

- Majority require FAFSA (75-100%).
- Some require FAFSA (50-74%).
- Few require FAFSA (1-49%).
- None require FAFSA (0%).



[8] Data on amounts disbursed and students served were collected from the 2024-25 NASSGAP Survey Data.

[9] One of the most significant challenges in the inventory of state aid programs was reconciling statutory requirements with the practical administration of these programs. To address this, the project team reviewed both statutory language and publicly available information from state aid programs and state higher education agency websites to understand not only what is required by policy, but also how programs are implemented in practice. A limitation of this method is that, because this analysis relies on publicly available sources, some information may not fully reflect the most current administrative practices.

Forty-seven percent of programs are need-based, and 36% of these use some financial data from the FAFSA, with SAI being the most used data point. While the number of need-based programs might be small compared to the total number of state aid programs, they account for much of the funding, with ***approximately \$10 billion of the total \$15 billion distributed by the reviewed programs going to these 36% of programs.***

The scan identified other FAFSA components most frequently used by states, including citizenship status (24%), state residency (18%), FAFSA completion date (14%), and loan default status (14%). This information provided a detailed inventory of the federal data elements that form the backbone of state aid systems. The full list of current and past FAFSA elements still named in policy by state aid programs is in Table 1. However, these percentages do not reflect all state programs that use these data elements, as they are based only on publicly available information on eligibility guidelines.

**Table 1: FAFSA Elements Used by State Aid Programs**

FAFSA Elements	Percentage of State Aid Programs
FAFSA Required	70%
Financial Data	36%
U.S. Citizen or Eligible Non-Citizen	24%
State Residency Requirement	18%
FAFSA Completion Deadline	14%
Not in Default on Federal Loans	14%
Selective Service Requirement	5%
Receive or Eligible for Pell Grant	4%
Not be Incarcerated	3%
In the Foster Care System, after the age of 13	3%
Drug Conviction Restriction	1%

The focus group with state aid administrators found that, while elements from the national scan, such as state residency and SAI, were used by many states, additional factors not included in the scan were also used, including dependency status and first-choice institution. State aid administrators also noted that removing previously used elements, such as selective service registration, housing options, and institutional ranking, has created a need for varying degrees of operational adjustment depending on how states have structured their own aid programs.

Some of these changes reflect deliberate federal policy decisions that states will need to reconcile at the state level, such as the removal of selective service registration. One state elected to maintain selective service registration for its state aid programs after the federal policy change, and it required operational changes to collect information from the institutions, which has become one of the biggest items the state aid administrators must audit before disbursing aid.

Other changes create operational challenges that are less straightforward to resolve. Without housing option information, state aid administrators and institutions have difficulty determining the correct cost of attendance, which is often a determining factor in how much aid a student can receive. The removal of the order in which students list their desired institutions on the FAFSA offers a closer look at what that difficulty can require of states in practice.

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## The First-Choice Problem

States have historically used students' first-choice institution ranking on the FAFSA to direct aid awards. While being redesigned, the FAFSA temporarily no longer revealed the order in which students listed schools. Michigan is one of several states that advocated directly with FSA leadership to reinstate that data, and the effort was successful. From this experience, Michigan took steps to reevaluate the process by which students are assigned to their top school.

Michigan, for example, now defaults to awarding aid to the first Michigan institution on a student's list. From this experience, Michigan has launched a process where institutions can verify selections using enrollment information and transfer students on their behalf. Michigan's workaround reflects the adaptations states have had to exercise when federal data infrastructure changes, filling gaps through institutional partnerships and advocacy.

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Where federal data infrastructure changes create genuine gaps between what states need and what the FAFSA provides, states have had to develop administrative workarounds, sometimes through institutional partnership or through additional data collection. The nature and burden of those adaptations vary considerably depending on whether the change reflects a federal policy decision that states will need to plan around or an infrastructural gap that states will need to address by spending time and resources finding their own solutions.

# State Aid Delivery: Navigating Federal Operational Uncertainty

For state aid administrators, when they receive FAFSA data is just as important as the data itself. The turnaround time for the FAFSA data was 1-3 business days in most states.[10] However, at least one state has reported experiencing up to a four-week delay in receiving its data. The operational challenges surrounding data delivery are largely within federal control, with the recent FAFSA simplification redesign highlighting some areas where it did not run smoothly.

EdConnect, the software provided by FSA to assist institutions and states with managing their federal student aid information electronically, undergoes regular changes. The initial EdConnect software updates and data layout changes in 2024 created significant implementation challenges for the states.[11] The overhaul particularly challenged states with limited IT capacity. Some states received incorrect FAFSA data during the rollout. One state received a delay in the FAFSA data, requiring manual verification to determine whether the student completed the FAFSA before the state aid program deadline. This burden fell entirely on the state administrators to absorb.

One technology used to ensure streamlined data delivery was the Application Programming Interface (API). ED created the API to allow state aid administrators to receive FAFSA and other data requested by the state directly from students who apply through the FAFSA on the web. [12] This allowed state aid administrators to address state data collection needs while

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[10] State aid administrators and institutions receive FAFSA data from the Institutional Student Information Records (ISIR).

[11] [FSA Knowledge Center Home Topics, EdConnect](#)

[12] [Application Programming Interface \(API\) Service Participation Agreement for State Scholarship and Grant Agencies](#)

reducing the burden on students and families. The API is currently suspended, but FSA is working on a redesigned version with a different data-transfer architecture that may expand the API's use. A recent FSA survey found that approximately 12 to 13 states have used the API in the past or indicated interest in using it if reinstated. The example highlighted from Minnesota illustrates how some states have built their own solutions rather than waiting for federal data infrastructure to be restored.

## Not Every State is Waiting



Minnesota has already built an internal custom solution rather than wait for the redesigned API. During the focus group, Minnesota indicated that they would not return to the API even if it becomes available again because they have already invested in a new solution. Minnesota illustrates both the resilience of state agencies and the cost of federal misalignment: when states cannot depend on federal infrastructure, they build their own.

Minnesota's experience is one data point in a broader pattern. As states have navigated delays, software overhauls, and the suspension of tools, questions about when and how reliably they can access federal data have become as consequential as the data itself. As FSA works to rebuild its infrastructure, states will weigh whether to re-engage with federal tools or continue investing in solutions they control. This calculation will depend not only on technical capability, but also on confidence that federal systems will remain stable.




# FAFSA Changes: Policy Mandates and State Adaptions

Not all FAFSA-related disruptions stemmed from operational challenges. Some reflect deliberate federal policy decisions that states were always going to need to reconcile. A major change with the FAFSA simplification redesign was the change from Expected Family Contribution (EFC) to SAI as the primary measure of student financial need. Our national scan found that 2% of the state aid programs examined still include EFC language in their policies — a sign that this federal legislative directive continues to affect state-level policy.

As SAI replaced EFC as the primary measure of student financial need, the transition appeared straightforward in theory. However, many states faced an immediate problem: EFC and SAI were not mathematically equivalent, meaning students already enrolled in state aid programs could face disruptions to their awards. States had to decide how to respond within their own legislative and administrative contexts to this federal policy change. Some states responded by grandfathering affected cohorts and updating statutory language to build greater flexibility for future federal changes. Another state addressed the transition through administrative rulemaking rather than rewriting the statute. Not all states found the transitions politically complicated, as seen by Nebraska's example

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## Updating State Statutes



When the federal shift from EFC to SAI required a statutory update, Nebraska brought the change to its legislature and found the approval process straightforward. The state updated its language directly, without the need for administrative workarounds. Nebraska's experience serves as a reminder that state context matters enormously. The same federal change that created political complexity for some states was a routine legislative update for others.

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These varied responses to the FAFSA simplification redesign create two distinct types of challenges for states: 1) technical and administrative issues tied to how federal systems are operated, and 2) political and statutory concerns tied to how states must respond to congressionally mandated policy shifts. Understanding which category a disruption falls into matters both for diagnosing what went wrong and for determining who is positioned to address it.

That distinction also shapes how states have experienced the transition overall. While the 2024-25 FAFSA cycle was fraught with disruptions and uncertainty, many focus group participants noted that once past the initial challenges, this 2025-26 cycle has been running more smoothly. Participants noted that this shift was in part due to states' adaptability and to changes in FSA's communication. During the FAFSA simplification rollout, FSA held off-the-record briefings that prevented state agencies from sharing information with their own staff, a major source of frustration for state aid administrators. NASSGAP members reported that FSA has now assumed greater accountability following critical reports, has been more open in communication, and has provided greater transparency in meetings. Some participants expressed that the current FSA–state relationship is among the strongest it has been in years, attributed to these changes.

Not all of the adjustments fall on federal-state partnerships. Some of the most consequential work has happened within states themselves. Nebraska's experience illustrates one dimension of this: state aid administrators building internal capacity to adapt to federal policy changes, in part, through communication with state policymakers. This kind of internal advocacy and communication capacity to help state legislators understand what federal policy changes require for the state may be as important as any technical fix.

*Federal simplification may even create an opening for states to revisit and streamline their own aid structures, using the moment of necessary change as an opportunity instead of simply absorbing the disruption and moving on.*

# Alternative and Supplemental Applications

States have adopted a widely varying approach to integrating the FAFSA into their state aid administration systems. Many states use the FAFSA as the sole application for need-based programs while using separate applications for merit or categorical programs.[13] Others have developed supplemental applications to capture information that the FAFSA does not collect. And some have created alternative applications altogether, often to provide an additional pathway for students who are ineligible for federal aid, such as students without a documented immigration status. Table 2 groups states with alternative applications into three categories: 1) dual system, where students can apply for state aid with the FAFSA or an alternative application, often used to expand access to students who cannot fill out the FAFSA or who are unwilling to do so; 2) FAFSA and state application, where students are expected to fill out the FAFSA then an additional state application; and 3) program-specific where specific state aid programs have an alternative application that does not require filling out the FAFSA.

**Table 2: State Student Aid Alternative Applications**

Category	States (and DC)	How Students Apply	Key Implications
Dual System	CA, CO, IL, MA, MD, MN, NJ, NY, OR, RI, TX, VA, WA	FAFSA or state alternative application.	Expands access (especially for undocumented students); creates parallel systems and administrative complexity.
FAFSA & State Application	IA, PA, VT	FAFSA, then an additional state application for specific programs.	Allows state-specific eligibility rules; introduces friction at handoff.
Program-Specific	GA, LA, TN	Alternative applications for specific aid programs.	Enables targeted aid design; creates navigation challenges and system fragmentation.

[13] Categorical state aid programs are awarded to individuals who meet a specific criterion, often regardless of financial need or merit achievements, based on their background, field of study, or group affiliation.

States that have alternative applications — except Colorado, Rhode Island, and Texas — mention these alternatives in statutes, policies, or on their higher education agency's websites. These alternative applications usually do not replace the FAFSA for eligible students. Other states provide alternative applications just for specific programs. Iowa, Pennsylvania, and Vermont require the FAFSA, followed by an additional application for specific state aid, while Georgia, Louisiana, and Tennessee provide alternative applications that can be completed without completing the FAFSA. Mississippi's approach illustrates how the alternative application model can be inverted entirely, with the FAFSA serving as the supporting document rather than the primary one.

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## FAFSA as the Supporting Application



Mississippi operates a variation of the alternative application model discussed above. While other states offer an alternative application for students who are not eligible to fill out the FAFSA, Mississippi requires all students to submit the separate Mississippi Aid Application and accepts the FAFSA as a supporting document. The FAFSA is a required supporting document for the state's need-based and foster youth programs and an optional residency document for all other programs. Currently, more than 90% of applicants submit both. Mississippi's model shows that some states need additional information that is not attainable through the FAFSA, while underscoring the critical importance of the FAFSA to the effective administration of state aid programs, particularly need-based programs.

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The variation in state approaches described throughout this section reflects different levels of insulation from federal volatility. States that have structured their application systems to function independently of the FAFSA, whether through supplemental forms or alternative applications, have more options when federal processes shift. The evidence also suggests that student FAFSA completion rates are driven more by students' need for federal aid than by state requirements, a dynamic worth weighing as states consider how closely to align their programs with the federal form.

# Looking Ahead

The findings of this study show that state financial aid systems are deeply dependent on the FAFSA, and, in turn, the Department of Education. At the same time, it shows that states are not passive actors. States have demonstrated resilience and adaptability by updating statutes, building workaround systems, and redesigning applications, while minimizing interruptions to students.

That resilience, however, raises the question: Should states consider decoupling from the FAFSA or other federal systems? The evidence here does not support a move in that direction. Instead, it suggests that the existing alignment between state aid systems and the FAFSA is worth preserving. And as ED and FSA consider redesigning federal financial aid processes, policymakers should weigh the downstream consequences for states carefully. For states, this research points toward several strategic priorities, each involving an explicit trade-off between the efficiency of federal alignment and the flexibility of independent capacity. These priorities are intended to help state leaders think through that question.

First, states may want to review their statutory and regulatory language to identify any strict connections to specific data elements. By updating this language, they can incorporate more flexibility to adapt to future federal changes, emphasizing functional outcomes rather than focusing solely on specific data elements. State aid administrators can sometimes become absorbed in the mechanics of program administration, and it is worth pausing to ask: what is the program ultimately trying to accomplish? While many states might not want to change existing language, it could be an important consideration for any new programs or policies. The trade-off of this strategy is that flexible language can reduce the clarity that administrators and legislators rely on to run the state aid programs. Still, it can also insulate programs from disruption when federal definitions shift.

Second, the FAFSA's value as a shared infrastructure rests on its reliability. States that rely entirely on the FAFSA as their sole aid application should therefore consider what contingency they would need to build to maintain continuity if federal delivery were disrupted again. This means assessing whether a supplemental or alternative application pathway could provide meaningful continuity without imposing undue burden on students. This is not an argument for decoupling. Separate applications require state investment, a processing infrastructure, and student communication, and risk creating a two-track system that adds complexity for students already navigating a difficult process. But as shown in the study, there are multiple pathways to build resilience without abandoning that alignment with the FAFSA, including: developing supplemental institutional processes to buffer against federal data

delays; updating statutory language proactively to build in flexibility for future federal changes, and for states that already have a separate application, structuring it to complement the FAFSA so that the federal pathway remains the primary one. The goal is not to move away from federal alignment, but to create a safety net that protects students when the alignment is disrupted.

Finally, states should continue to invest in their relationships with FSA, their internal state agencies, and associations such as NASSGAP to build trust and processes that will help withstand future disruptions. This includes building internal capacity to translate federal policy changes for state policymakers so that, when changes like the EFC-to-SAI shift occur, state aid administrators are positioned to lead that process clearly. That investment, however, carries its own trade-off. While deeper engagement with federal partners builds trust and improves communications, it also means states remain oriented toward and dependent on a federal partner whose priorities, leadership, and reliability can shift with each administration. States are not merely recipients of federal policy; they are implementation partners whose experience and expertise should inform the evolution of the FAFSA. That perspective is most influential when states are actively engaged, not when they have stepped back. States should therefore pursue federal engagement and independent capacity in tandem.

These priorities do not exist in a vacuum; they reflect what state aid administrators have learned through years of navigating federal change. When asked directly what they needed from FSA in the years ahead, four main topics emerged: discussion on data elements before they were changed or removed, stability, guidance on reporting aggregated data, and clearer, more thoughtful implementation timelines for changes and new programs.

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## Discussion of Data Elements

Whether it's the major change from EFC to SAI, or the removal of selective service registration or housing options data, there are key data elements in the FAFSA that states rely on. While simplifying the FAFSA can make it easier for students and their families, it could also create an additional burden for both state agencies and students, who now must provide the information separately.

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**02**

## Stability

As shown throughout the report, the FAFSA simplification redesign imposed an extraordinary administrative burden on state agencies, and they have not yet fully recovered from it. Additional changes in the near term would compound the burdens that these state agencies are now starting to recover from. The recent announcement of plans to move the student loan portfolio to the U.S. Department of the Treasury risks compromising the stability that state aid leaders seek. For example, the transition plan includes first transferring loans that are in default to the Treasury. Our national scan found that 14% of state aid programs require students to be free of default on a federal student loan to be eligible. Students looking to re-enroll will need clear information on how to bring their loans back into good standing and how to communicate that to their state and intended institution to be considered for all forms of aid for which they may be eligible. The transition of defaulted student loans to Treasury must include clear processes for updating borrowers' loan status when they are no longer in default, in order to support state aid administration effectively.

**03**

## Guidance on Reporting Aggregated Data

While states receive many data points about aid applicants through their FAFSAs, they lack adequate guidance on how they can or cannot use this information to support analysis within their own programs. Specifically, state aid administrators want more guidance on the permissible use and reporting of aggregated data derived from Federal Tax Information (FTI). Many state aid administrators remain unclear about when and where aggregated data can be reported. Some have stated that they have received informal assurances, but in the absence of written guidance, many are erring on the side of caution. This can lead to the loss of important data, such as income data from the NASSGAP survey, which can reveal meaningful changes and trends over time. It also limits how states can use this information internally to inform their program design and assess if their state aid programs are meeting their intended objectives.

# 04

## Clear Implementation Timelines

State aid administrators and other state actors are currently working through the implementation of Workforce Pell and are finding the compressed timeline and uncertain rollout schedule difficult to plan around. While state aid administrators understand that stability may not be practically feasible, setting realistic implementation timelines is necessary.

The stakes of getting this right are high. State financial aid programs serve millions of students each year, and the administrative systems that deliver those awards are largely invisible to students until they fail. Beyond federal volatility, state aid administrators identified state funding levels as their next most pressing concern, a reminder that even a well-functioning federal-state partnership cannot compensate for programs that are under-resourced relative to student need. Strengthening these systems, at both the federal and state levels, is imperative for student success.

