

Investing in Community-Based Innovation to Strengthen Postsecondary Access and Success

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As the Trump-Vance Administration takes office, America Forward and National College Attainment Network jointly urge you to prioritize support for community-based innovation that strengthens postsecondary access and success. Our organizations collectively represent more than 650 non-governmental organizations and educational institutions supporting students across the country from elementary school through post-college. America Forward partners with more than 100 social innovation organizations nationwide that champion innovative solutions to our country's most pressing issues in education and economic mobility. The National College Attainment Network (NCAN) represents more than 500 college access and success organizations, working to support millions of students across the country to attain a postsecondary degree.

Under the Trump-Vance Administration, the Department of Education should eliminate regulatory barriers to community-based organizations' (CBOs) engagement in higher education programs and partner with these organizations to ensure the effective functioning of our federal financial aid system. Here's why:

- Students and families, as well as the institutions and CBOs that support them, remain deeply concerned about the forthcoming 2025-26 FAFSA process following last year's enormous challenges. The Department must run a smooth process this time and rebuild trust with students, their families and the higher education community. A successful FAFSA is the foundation for strengthening college access and success.
- More broadly, students increasingly express concern regarding value in higher education and the need for more robust navigation assistance as they consider their options.¹ CBOs are ready to provide high-quality navigation support to help students secure valuable credentials.
- Current federal funding streams fail to fully leverage the capacity, expertise, and ingenuity of CBOs that play a critical role in driving college access and success. We saw this summer the essential role that CBOs can play as the ECMC Student Support Strategy yielded a surge of FAFSA completions. Unfortunately, many funding opportunities are only available to schools or institutions, limiting the scope of impact and innovation. Further, last year's third-party servicing proposal threatened to exclude or substantially burden many high-impact nongovernmental access and success providers.
- There are many untapped opportunities to drive dollars to the most innovative, effective programs in higher education. Even as the evidence base on college access and success has grown, federal funding has provided only limited support to practitioners seeking to adapt and scale proven approaches as well as build evidence.

Near-Term Actions

In the first 100 days, the Administration should prioritize successful implementation of the 2025-26 FAFSA:

- Engage and empower subject-matter experts in the administration of the FAFSA.
- Increase data transparency by releasing in a timely manner:
 - information on *all* issues that impede full FAFSA functionality
 - FAFSA completion rates for returning students (in addition to high school seniors)
 - aggregate Pell eligibility distribution information
- Ensure sufficient call center capacity to support all applicants, including those who speak a

¹ See <https://hcmstrategists.com/resources/hcm-edge-research-continuing-to-explore-the-exodus-from-higher-education>

language other than English, and resolve their issues promptly.

- Improve the contributor matching process by allowing for more flexibility in street addresses.
- Fix the FSA ID process to enable people without Social Security Numbers to verify their identities.
- Create a secure portal to allow individuals going through the identity verification process to securely upload proof of identity.

Longer-Term Actions

Over the longer-term, we encourage the Department to take the following steps:

Expand postsecondary funding opportunities for non-governmental providers. While nongovernmental student success CBOs have spearheaded some of the most evidence-based, innovative postsecondary strategies, the vast majority receive no meaningful federal support for their work. In fact, the Department's postsecondary access and success programmatic grant applications have often excluded nongovernmental providers (or require an institution to serve as the lead applicant). This is problematic because CBOs are well-positioned to scale and innovate new strategies. CBOs also play an essential role in supporting students across institutions, such as the growing number of programs supporting students from high school through college graduation or who return to school after stopping out.

The Department should prioritize leveraging its statutory authority to expand lead grant eligibility to nongovernmental organizations under the Federal TRIO program as well as the new Postsecondary Student Success Grants evidence fund.² We also encourage the Department to support states and educational institutions in partnering with high-impact nongovernmental providers under forthcoming GEAR UP and TRIO grants by issuing guidance and prioritizing such partnerships in grant competitions.

Improve FAFSA. The Department should adopt a predictable and transparent annual schedule for the FAFSA that reverts to the previous FAFSA release date of October 1, in alignment with the recently-passed FAFSA Deadline Act (H.R. 8932), and adds steps that will improve the process for students. This approach would involve releasing a draft FAFSA for public comment in February, adding an annual testing phase that includes students, families, and higher education institutions, releasing outreach tools and resources, including a user-friendly Pell Look-Up Table in August, fixing the FSA ID process for all students and contributors, and providing complete data on completion rates weekly.

Expand and strengthen the Postsecondary Student Success Grants (PSSG) program. We are excited by the recent federal investment in the PSSG evidence fund program, which has the potential to drive major gains in evidence-building and evidence-scaling. We encourage the Department to pursue similar funding for PSSG, which received \$45 million each of the past two years, to the companion K-12 evidence fund Education Innovation and Research (EIR), which is funded at around \$260 million annually.

We also encourage the Department to take actions to fully leverage the PSSG program's potential, including prioritizing cost-effective strategies; strengthening transparency regarding funding programs in alignment with the EIR program; and providing more robust technical assistance.

Conclusion

We welcome the opportunity to discuss these recommendations. Please reach out to Chase Sackett (chase_sackett@newprofit.org), Policy Director at America Forward, and Catherine Brown (brownc@ncan.org), Senior Director, Policy and Advocacy at National College Attainment Network.

² The Higher Education Act explicitly provides that "public and private agencies and organizations, including community-based organizations..." are eligible recipients for TRIO grants, while appropriations legislation has stated that PSSG should include non-profits as eligible applicants (see, e.g., [here](#) at page 233).