



Cradle-to-Career Data and Tools Advisory Board Proposal Form

Instructions:

Per the [Governance Manual](#) proposal forms submitted will address significant gaps regarding whether the data system is providing access to actionable information. Please note there should only be one proposal per form.

Name:

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Proposal Title: *no more than 50 characters*

Track Financial Aid Displacement Experiences

- By checking this box, I understand that if a Data and Tools Advisory Board member sponsors my proposal, it will be considered as a submission from the Data and Tools Advisory Board member.

Type of Proposal¹:

- Changes to practical tools for students (*Complete section one*)
- Adding data points not available through the P20W data set or adjusting (including the removal of) the existing P20W data points (*Complete section two*)

¹ The C2C Governance Manual notes that DTAB members can also submit recommendations related to the data request process and changes to tools such as dashboards. As the data request process and the dashboards are not yet live, those sections have been removed from the version of this form.

- Please note a proposal form(s) can recommend adding one data point or several clearly related data points to the data system.

Section One: Changes to Practical Tools

1.What is the nature of the gap regarding access to actionable information?

2. What type of tool should be developed?

3. How would a tool address the gap?

4. Who would be the likely user(s) of the tool?

5. How does the tool relate to the [mission and vision](#) of C2C?

Section Two: Adding Data Points Not Available Through the P20W Data Set or Adjusting the Existing P20W Data Points

1.Please state the research question of interest that cannot be fully addressed with the [existing data elements](#) in the P20W Data System.

The research questions to answer are:

1. *How did a student's financial aid resources change while they were in college?*
2. *Both during the academic year and over the course of the student's college journey?"*

Currently C2C tracks **Postsecondary Financial Aid Experiences** such as what

financial aid students are 1) eligible for, 2) applied to, 3) approved for, and 4) received. This includes state and federal financial aid and loans.

But we do not have a data element to track how a student's financial aid can CHANGE (delta) during an academic year (i.e., between semesters or quarters) and over the course of their college journey (i.e., in freshman vs senior years).

The Northern California College Promise Coalition (NCCPC) has advocated to ban the practice of scholarship displacement since 2020, a nationally recognized example of financial aid displacement that is triggered by students' receipt of outside private scholarships. This practice has impacted our founding member organizations like Oakland Promise in Alameda County and Richmond Promise in Contra Costa County, who have collectively distributed over \$50 Million in scholarships to local students since they were founded. The bill AB 288 was passed in September 2022 and the law went into effect in the academic year 2023-2024. A second bill AB 3240 passed in September 2024 further expands on this law by including Cal Grant recipients. (1)

Moreover, we encourage C2C to consider how the Better FAFSA implementation challenges have exacerbated financial aid challenges for tens of thousands of students over the last two years. For example, there are students who were forced to rely on scholarships and whose Student Aid Index (SAI) may have changed one or more times resulting in an even more unstable financial outlook. We have concerns that similar issues will persist as we approach future financial aid cycles.

(1)

norcalpromisecoalition.org/ab-288-guides-to-prevent-scholarship-displacement

2. How does this research question relate to the [mission and vision](#) of C2C?

This research question is a critical missing piece of the college affordability puzzle, and supports the goals of the Financial Aid dashboards. As described on the C2C website about the goals of the Financial Aid dashboards:

“For Students and Families: ...build awareness about institutional variables that influence student outcomes.”

- This research question especially helps students and families better understand institutional variables that are impacting how students benefit from all of the financial aid that they qualify for.

“For Faculty and Counselors: ...clarify how to focus advising; identify interventions that can address equity gaps.”

- This research question especially helps practitioners focus their advising to support students and families in navigating financial aid displacement when it occurs. It can also inspire K-20 leaders and practitioners to embed financial aid displacement awareness for students and training for their teams.

“For Administrators and Policymakers: ...highlight how outcomes vary by student characteristics; identify institutional variables that influence student outcomes; support advocacy for improvements in state financial aid systems.”

- This research question especially helps college leaders and policymakers to address the widespread practice of financial aid displacement.
- There are internal college practices and policies that dictate how students are impacted by financial aid displacement. It is often the responsibility of financial aid leaders on the campus and at the postsecondary system level to update existing policies to prevent unintentional harm to students.
- This data can help inform changes in internal systems such as early warning systems and automated alerts to financial aid administrators and students when overawards are likely to lead to financial aid displacement.

“For Advocates and Researchers: clarify how financial aid relates to postsecondary applications, enrollment, and success, and if all students are benefiting from aid; identify potential strategies for closing equity gaps, raising awareness, and developing policy proposals.”

- This research question especially helps advocates and researchers to understand whether or not all students are benefiting from aid, and the

different factors that influence this, which include financial aid displacement.

- The CA Ban on Scholarship Displacement Act of 2021, while currently in effect, can benefit from future research that can inform enhancements to this law over time to further close equity gaps.

3. Please propose additional data element(s) needed in order to successfully address the research question of interest.

Data that is critical to tracking financial aid displacement include, but are not limited to, the following:

1. Number and demographics of students impacted.
2. What college they attended when displacement occurred.
3. What term and year of college they were in school when it occurred.
4. The total cost of attendance (COA) at the college that year.
5. The last time that COA was updated for that institution.
6. The name/source of the outside private scholarship (e.g., Richmond Promise, CAA Alumni Scholarship).
7. The amount of financial aid impacted.
8. Which types of financial aid were impacted (e.g., institutional grant or scholarship, institutional loan, work study).

4. Please verify that the proposed data element(s) do not already exist in the P20W Data System.

I have checked <https://c2c.ca.gov/data-points/> and several of the specific data points noted in question #3 do not exist when I review the Postsecondary Financial Aid Experiences, where this belongs. For example, the data point for Total Cost of Attendance is not provided. It's possible this is because this data is traditionally tracked at the college level, but anecdotally we know that depending on a student's major (e.g., STEM), this can greatly impact the student's total cost of attendance (e.g., additional costs for labs, more expensive computer and software requirements).

5. If the P20W Data System does not currently include the proposed data element(s), can the proposed data element(s) be derived from the existing data element(s) in the P20W Data System?

It is possible that this data can be derived from the existing Postsecondary Financial Aid Experience data elements. For example:

Amount of Debt

- It's possible to look at the amount of debt for a student at the beginning of the year and then look at what it is at the end of the academic year.
- This would help identify if the student had to take on more or less loans by answering the question, "Did the student end with more or less debt than originally anticipated that year?"
- From here, we can figure out what may have led to the change, such as financial aid displacement that forced the student to find other means to close the gap in their total cost of attendance for the period.

Amount of Financial Aid X Type of Financial Aid

- It's possible to look at the amount of financial aid by type of financial aid at the beginning of the year and then look at what it is at the end of the academic year.
- This would help identify if the student had a change in financial aid like:
 - Institutional grants or scholarships
 - Institutional loans or work study
 - Other forms of aid (e.g., Cal Grants, MSC)
- From here, we can figure out what may have led to the change, such as financial aid displacement.

Approved for State Financial Aid X Received Financial Aid

- It's possible to look at the state financial aid that students were approved for at the beginning of the year and then look at what the student received at the end of the year.
- This would help identify if the student did not benefit from state aid even though they were approved for it.
- From here, we can figure out what may have led to differences in what was approved versus received, such as the influence of financial aid displacement.

Expected Family Contribution for Financial Aid Recipients

- It's possible to look at the EFC or the SAI for financial aid recipients at the beginning of the year, and at the end of the year in case students submitted appeals in response to overaward flags that trigger financial aid displacement.

Unfortunately, without data on the **Total Cost of Attendance** for a college in a given academic year, it will be difficult to calculate when overawards can happen for students.

6. If the P20W Data System does not currently include the proposed data element(s), are there existing data element(s) closely related to the proposed data element(s)? If so, please list them and why they are not sufficient to answer the proposed research question.

Per responses to question #5, while there are existing data elements that are closely related to the proposed data elements, they are not sufficient to answer the proposed research question if they are only collected once per year. Whether Postsecondary Financial Aid Experience data elements like amount of debt and financial aid are collected at the beginning or the end of the year, this does not tell a complete story about a student's experience with financial aid over the course of that academic year.

Scholarship displacement is a form of financial aid displacement that happens when one form of student financial aid (i.e. institutional scholarship) is reduced after receipt of another form of student financial aid (i.e. private scholarship). Displacement is triggered by a financial aid overaward which happens when a student's financial aid package exceeds financial need. Colleges are not allowed to overaward according to federal regulations. Receiving a private scholarship may create a scenario of overaward. Identification of overaward scenarios can happen at any time during a student's academic year, after they have already enrolled in a college.

In 2025, now more than ever, low-income and otherwise underresourced students are relying more heavily on scholarships than ever before to meet the

growing costs of college. To effectively track financial aid displacement, like scholarship displacement, C2C needs to be able to track 1) the total cost of attendance for a college in a given year, and 2) the journey of a student's financial aid package over the course of that year.

7. C2C keeps a [repository](#) of previous data elements that were either a) considered during the planning process or b) proposed through the mechanisms as outlined in the Governance Manual, but were ultimately not included in the P20W, along with related feasibility studies. Do any of the data element(s) being proposed overlap with the data elements in this repository? (New proposals can build on or duplicate prior proposals. It is helpful for proposers to share that context, including prior related feasibility studies.)

There are no previously submitted data elements in the repository that align or overlap with this request as of April 23, 2025.

8. Are the proposed data element(s) already collected by a state-level entity? For data element(s) already collected, please answer question nine. For data element(s) not collected, please answer question ten.

No, this data is not collected by one state-level entity based on our research, though the CA Community Colleges may have the greatest breadth and amount of data at this time. We have explored this with the California Student Aid Commission and they do not collect it.

9. [For proposed data element(s) already collected] To the extent possible, please share details pertaining to the proposed data element(s). Relevant details may include but are not limited to: a) corresponding entity that collects and houses the data element(s); b) specific variable name(s) used in the originating data system; and c) timeframe available.

N/A

10. [For proposed data element(s) not collected] Please propose institution(s) that would be most suited for the new data collection effort.

Financial aid is tracked at the college/institution level; thus, we recommend that financial aid offices begin to collect this data so that they can report it to their corresponding postsecondary systems (e.g. UC, CSU) who can report it to C2C.

Note that NCCPC has partnered with the UC Office of the President, a C2C data-sharing partner, to track scholarship displacement student reports at scale from 2023-2026. This is the only known example of tracking financial aid displacement at scale in the state.

11. Please explain the desired level(s) of grain size for each data element proposed. (i.e., individual-level, institution-level, or other aggregated levels)? Multiple grain sizes may be requested for each proposed data element.

This proposal seeks to explore how to track changes in students' financial aid during the course of an academic year. This requires an ability to track changes to students' financial aid packages, which means tracking:

1. What financial aid was originally awarded to the student (what was listed in the initial college financial aid offer letter),
2. How did the financial aid change during the year (did any component of the initial offer letter change and if so, when, which components, and by how much),
3. What financial aid did the student accept/receive, cumulative, at the end of the academic year (compared to what was initially offered), and
4. Did financial aid change for a student more than once during their college journey?

Answers to these questions would be best answered at the following levels/grain sizes, in order of priority:

1. **Institution-level:** By tracking the aggregate data around financial aid displacement, the analysis can support enhanced internal practices and policies at the institution and system levels.
 - a. With data disaggregated by student demographics like ethnicity

and income, an analysis can determine where the equity gaps are and who is most impacted by displacement.

2. **Individual-level:** To directly support students, this data must be tracked at the individual, student level. Tracking and evaluating the practice of displacement is one part of the work, the other is to figure out how to reduce the rate of these issues occurring. Scholarships help students thrive and complete their higher education with little to no debt.

Financial aid displacement, like scholarship displacement:

- a. Penalizes students
- b. Increases borrowing and reduces completion
- c. Defies scholarship donor intent
- d. Shows up in many forms

12. Please explain the intended use case(s) for the proposed data elements (i.e., dashboards, query builder, or the research request tool)? Multiple use cases may be requested for each proposed data element.

Currently, NCCPC is the only organization collecting data about financial aid displacement, specifically scholarship displacement, at scale in the state. We do this in two ways:

1. Hosting an open access free online form that NCCPC staff manage to collect cases of scholarship and other forms of financial aid displacement.
2. Collecting data directly through NCCPC members who share this data at the aggregate or individual-level (through data-sharing agreements).

Dashboards

- The **Goals** would include:
 - Adding a filter or other mechanism to track changes in financial aid during the academic year.
- The **Dashboard** would include:
 - Disaggregation by a) year, b) college, c) student characteristics (including race/ethnicity, gender, age bracket, parental education level, military status, foster status, and homelessness status), and d) the before/after/delta amounts of the types of

financial aid that changed.

- Export with the ability to provide summary files or charts based on the variables selected.

Query builder

Local, regional, and state leaders can run specific queries leveraging information about financial aid displacement to better understand how student outcomes are impacted by changes in their financial aid during their college journeys. They can research answers to topics listed in question #2.

Research request tool

Researchers can conduct complex analysis and evaluate how changes in students' financial aid during the course of their academic year may impact persistence and completion as well as food and housing insecurity.