When Care Isn't Enough:
Administrative Burden in Federal Higher Education Pandemic Emergency Aid Implementation

Abstract: Departing from traditional financial aid policies, during the pandemic the federal government introduced emergency aid to higher education for the first time. This study examines the implementation of that program, including students' need for and access to the resources and the processes they navigated to obtain help. We identify multiple forms of administrative burden present, and using both survey data and focus groups, explain how they affected students and institutions. The psychological costs of administrative burden were particularly substantial and should be addressed in future programming.

Keywords: higher education, financial aid, poverty, community colleges, COVID-19 pandemic

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For decades, American undergraduates pursuing certificates and degrees have struggled to afford college (Goldrick-Rab 2016b). The federal financial aid system under-delivers on its promises to make higher education affordable, leaving even students at community colleges facing high levels of unmet need (Ma and Pender 2021; Walizer 2018). The administrative burdens in that system are a key source of its failures—it is difficult for students to learn about financial aid, apply for support, and comply with the many requirements associated with continuing support (Anderson et al. 2020; Bettinger et al. 2012; Dynarski and Scott-Clayton 2006; Goldrick-Rab and Kolbe 2016; Lee et al. 2021; Schudde and Scott-Clayton 2016). These problems, coupled with programmatic underfunding, left undergraduates vulnerable when the coronavirus (COVID-19) pandemic hit.

In many ways, the new economics of college—present before the pandemic and exacerbated by it—made it predictable that the onset of the pandemic immediately took a toll on students (Goldrick-Rab 2016b). Enrollment fell quickly among structurally minoritized and low-income communities and continued to fall as the pandemic dragged on (National Student Clearinghouse Research Center 2021a, 2021b, 2021c). Colleges and universities faced a unique emergency. Tens of millions of students were struggling to meet their basic needs, and institutional emergency aid funds were rapidly running out. High rates of both food and housing insecurity were evident; a spring 2020 survey found that nearly 60 percent of students experienced shortages of food or challenges affording housing and a fall 2020 survey affirmed those results (Goldrick-Rab et al. 2020).

For the first time in history, Congress responded by authorizing billions of dollars in emergency aid to try and quickly alleviate hardships. Legislators created a separate funding stream, distinct from standard financial aid programs that required extensive means-testing and other red tape. Their goal was to act decisively and to allow flexibility, responses consistent with the urgent demands of an emergency. Colleges and universities shared that desire, but their challenges were unprecedented in both scope and scale. Effective emergency response requires agility, capacity, and speed. No institution had ever developed a plan for anything of the magnitude of the crisis confronting them. Addressing a few

emergencies per week might have been possible with pre-pandemic approaches but addressing hundreds a day was not.

Despite stated intentions on the part of both Congress and the U.S. Department of Education (ED) to create a rapid and accessible form of support, administrative burdens quickly pervaded emergency aid implementation. This reduced its efficacy, especially for students who needed it the most. This paper examines the implementation of the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act emergency aid dollars, along with the two subsequent stimulus allocations, and dissects how administrative burdens in federal emergency aid affected students' access to support during the pandemic.

The New Economics of College

Students and families have struggled with the new economics of college for more than 20 years (Goldrick-Rab 2016b). Stagnant incomes, declining state support for higher education, college price tags that strain the finances of all but the top earners, rising wealth and income inequality, and a threadbare social safety net have all made a college degree less attainable (Desilver 2018; Menasce Horowitz, Igielnik, and Kochhar 2020). The pandemic-induced recession exacerbated these issues, pushing Americans who were already on the edge firmly off the cliff (Long et al. 2020).

The federal financial aid system's many shortcomings have long frustrated—and often failed—both students and colleges. Structural flaws pervade the design of the system, the estimation of price, the allocation of need, and the delivery of funds, all of which magnify inequality (Burd et al. 2018, Conroy et al. 2021a, 2021b; Kelchen 2017, 2018, 2020; Kelchen, Goldrick-Rab, and Hosch, 2017; Kendall et al. 2020). As a result, nearly three in four students have unmet need (Goldrick-Rab 2016b). This group includes community college students, where the average price after grants now exceeds $8,000 a year (Ma et al. 2020). Even Pell Grant recipients—who are supposed to have all their needs met through federal aid—often don't have enough to pay for food and housing (Baker-Smith et al. 2020; Goldrick-Rab and Kendall 2016). These systemic inequities weigh most heavily on structurally minoritized students who already experience the highest rates of basic needs insecurity and carry the largest amount of student debt (The Annie E. Casey Foundation 2021; The Hope Center for College Community and Justice 2021).

Today's economy is marked by volatility, low wages, and wealth inequality, making emergency aid crucial. Many students work multiple jobs to try and make ends meet, and those efforts became more difficult—and risky—during the pandemic (The Hope Center for College, Community, and Justice 2021). Few students can count on family and/or savings to float them during difficult times (Baker-Smith et al. 2020). Even the social safety net is often unavailable, as most programs have terms and procedures that exclude many students (Goldrick-Rab 2019; The Hope Center for College, Community, and Justice 2019).

A Brief History of Higher Education Emergency Aid

Given the problems just described, colleges and universities have long recognized that emergency aid is an important practice and before the pandemic many created small or moderate-sized programs (Kruger, Parnell, and Wesaw 2016). Kevin Kruger, Amelia Parnell, and Alexis Wesaw's (2016) landscape analysis found approximately 523 campuses with emergency aid programs with 82 percent of those programs existing for three or more years. Each program had its own unique process, scope, and style. The authors identified programs housed everywhere from student affairs to financial aid offices that were led by both students, such as Students Making a Change, and faculty, such as the Faculty and Students Together (FAST) Fund. With an initial budget of $100,000, the FAST Fund has assisted more than 10,000 faculty and students across 36 colleges and universities since 2016 (The FAST Fund n.d.).

When confronted with the pandemic, even successful institutional programs quickly fell short (Kienzl et al. 2020). A spring 2020 survey of staff at 107 institutions revealed:

- Just 27 percent felt that they had sufficient financial resources, a rate even lower (i.e., 21 percent) at community colleges;

- Just 44 percent felt their emergency aid programs were adequately staffed to deliver support within 48 hours;

- Only 44 percent extensively advertised their programs to students; and

- Only one in four offered access to emergency aid outside of standard business hours, leaving many students waiting even longer to receive help.

A spring 2020 survey of students documented the consequences of these institutional challenges, namely that few students knew about emergency aid programs or received support (Goldrick-Rab et al. 2020). Among students experiencing basic needs insecurity:

- Just 15 percent applied for emergency aid;

- One in three did not know that emergency aid was available;

- Nearly one in three thought they were ineligible; and

- A staggering 19 percent did not know how to apply for emergency aid.

Clearly, additional financial support was needed—but so was stronger and more effective program administration. In late spring 2020, Congress unveiled the Higher Education Emergency Relief Fund (HEERF) as part of the CARES Act (Madoo and Bennett 2021).[1] The fund included $6.3 billion in emergency grants available to students for "expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student's cost of attendance, such as food, housing, course materials, technology, health care, and childcare)" (Coronavirus Aid, Relief, and Economic Security Act 2020).[2]

Colleges—and students—began to celebrate. For example, many California community college students received CARES funds at crucial phases of the pandemic (Alva et al. 2021). One student surveyed wrote, "The aid has been very helpful…. It helped out with bills and car payments, but then that money was gone in a flash because we were so behind."

For funds to reach students, the ED had to produce guidance. Then-Secretary of Education Betsy DeVos initially gave colleges discretion to determine student eligibility and how they would award funds, but the ED's initial guidance was complex and confusing. Clarifications were issued, with ten updates in two months from April to May 2020, resulting in even greater confusion and further delays. Challenges followed swiftly, with The Hope Center for College, Community, and Justice (The Hope Center), National Association of Student Financial Aid Administrators (NASFAA), and others showing how the guidance made it difficult for colleges and universities to respond with necessary agility (Kienzl et al.

2020; National Association of Student Financial Aid Administrators 2021; The Hope Center for College, Community, and Justice 2021).

Some colleges were pressured by the ED to reject CARES funding all together while limiting eligibility to students qualified under Title IV. These restrictions meant the exclusion of international students, Deferred Action for Childhood Arrivals (DACA) students, students who had a minor drug conviction, students who did not register for the Selective Service, and transient students.[3] In June 2020, an injunction was issued, a lawsuit filed, an interim ruling handed down, further guidance crafted, and more of the same, all of it standing in the way of colleges helping students in need. One practitioner said, *"We know what our students need. If this is really 'emergency aid,' it would be nice if they let us get this out quickly and with fewer conditions."*

Most institutions deployed the CARES Act support by mid-2020. At the end of that year, Congress acted again, authorizing another $6 billion in emergency aid as part of the Consolidated Appropriations Act, and again in March 2021, it approved more than $18 billion in aid. These funds were intended to be flexible and move quickly, and Congress exempted them from standard federal aid rules. Students who are not eligible for Title IV funds—including undocumented students, DACA, and those unable to complete the Free Application for Federal Student Aid (FAFSA)—were deemed eligible for aid. Additionally, students were given discretion to use the funds for any component of their college costs (e.g., emergency costs such as food, housing, health care, or childcare, student debt, unpaid account balances). While this second round of funding eased many restrictions present in the first round, it could not correct for the initial confusion and barriers which delayed initial disbursement and left many students without additional aid.

Prior Research on Emergency Aid and Administrative Burden in Financial Aid

There is very little published research on higher education emergency aid programs, and this may be the first study of their implementation during the pandemic. Prior studies clearly point to the need to consider programs' administrative burdens. For example, researchers evaluated an emergency aid program at a Texas community college and concluded that it only yielded positive results when

emergency aid was coupled with case management (Evans et al. 2019). While the scholars determined that this meant that money alone was insufficient to help students, it is also possible that the effects of the money were undermined by administrative burden.

The Texas program was rife with application and compliance costs, including numerous eligibility requirements. It required a minimum grade point average and disqualified students who would be graduating soon, and students categorized above 200 percent of the threshold to receive a Pell Grant. While those restrictions might have been intended to maximize equity, there is evidence that even middle-class students are at risk of basic needs insecurity, occasionally because their parents do not provide the support suggested by the expected family contribution (EFC) (Goldrick-Rab 2016a). The restrictions also meant that in order to qualify for emergency aid, students had to first complete the FAFSA. Of the nearly 9,000 students at the Texas college, barely 1,100 were deemed eligible for emergency aid.

In addition, there were substantial learning requirements. The program was not widely advertised, and students had to jump through many hoops to get assistance, including demonstrating that their emergency was "foreseeable, controllable, and temporary." In the end, only 126 students submitted a total of 74 requests for support; 3 in 4 were approved, receiving an average payout of $300. Given this approach to implementation, the lack of clear program impacts may have been predictable.

Indeed, administrative burdens restrict access to program benefits and, in so doing, help to ration scarce resources and exert social control (Soss, Fording, and Schram 2011). Pamela Herd and Donald P. Moynihan (2019) delineated three types of burdens: (a) learning burdens which students face as they seek to learn about and understand eligibility requirements that determine whether they will gain access to the program; (b) psychological burdens; and (c) compliance burdens, associated with the program's rules and requirements. When administrators have discretion over program design, as in the case of emergency aid, their discretion shapes how administrative burden is distributed. In this way, college staff act as "street-level bureaucrats" who distribute opportunities and determine who gets what (Lipsky 2010).

Researchers have examined administrative burdens in other types of financial aid programs. For example, Sara Goldrick-Rab et al. (2021d) examined administrative burdens in completion grant

programs. Kelly Rosinger, Katharine Meyer, and Jialing Wang (2021) offered a typology of administrative burdens present in free college programs and identified behavioral supports available in some programs to address those burdens. However, to our knowledge, these administrative burdens have not been systematically examined in emergency aid programs.

Research Questions

In order to identify key areas of challenge and for improving federal emergency aid to college students in the future, we investigated the following questions:

1. Who needed, applied for, and accessed federally-funded emergency aid—and who did not?

2. What types of administrative burdens were present in federally funded emergency aid programs during the pandemic?

3. To what extent did administrative burdens vary across sectors and types of higher education institutions?

Methodology

The research questions speak to questions of both association and explanation, and thus require both quantitative and qualitative data. We use a sequential mixed methods approach, first collecting and analyzing quantitative data then obtaining and analyzing qualitative data to help shed additional light and context on the quantitative results. Throughout the pandemic's first year, we assembled multiple types of data to inform the analyses.

Student Survey

In September and October 2020, we surveyed students about their experiences with emergency aid (The Hope Center for College, Community, and Justice 2021). The sample includes more than 165,000 students at 154 institutions in 42 states who are broadly representative of about 1.8 million students, mainly at community colleges, public universities, and minority-serving institutions—the places where documented need for emergency aid is clearest.

Staff and Administrator Survey

In October 2020, we surveyed staff and administrators who worked on emergency aid programs at the colleges and universities that took part in the student survey. All institutions distributed federally funded emergency aid, and 90 percent also had other emergency aid programs in place.

Focus Groups

In spring 2021 (after HEERF II was in place but before HEERF III), we conducted focus groups with 63 staff and administrators who worked on federal emergency aid programs at 23 of the 154 institutions.

Results and Discussion

We analyzed the resulting data across types, looking for patterns of convergence and divergence, estimating statistical models and considering descriptive evidence. Some key background descriptors and differences of the institutional and student samples that are not examined here but nonetheless offer important context include:

- Large institutions (20,000 or more students) were more prevalent in the two-year college survey sample, whereas the balance between small and large institutions was more even within the four-year college sample.

- Four-year colleges were more likely to pre-select students to receive aid compared to two-year colleges (67 percent vs. 54 percent), and two-year colleges placed additional barriers in front of students by having them speak to staff to determine their eligibility (14 percent vs. 6 percent for four-year institutions).

- Only one-third of students could submit their application or receive help applying outside of standard business hours.

Accessing Federal Higher Education Emergency Aid

After more than 50 years, most institutional financial aid programs are similar in their design and delivery systems. Colleges, however, use a variety of tools to inform students about available grants, scholarships, and loans, most of which originate from institution financial aid offices. All federally

funded programs use the same standard application, the FAFSA, and all are required to complete several compliance activities, including verification and satisfactory academic progress assessments. However, federally funded emergency aid program implementation is not codified in law or by practice.

Despite administering small-scale emergency aid programs prior to the pandemic, most college administrators found that federally funded support was a whole new ballgame. As a result, the design of emergency aid programs during the pandemic varied widely as did the systems created to deliver the aid. All three types of administrative burden outlined by Herd and Moynihan (2019) were present.

Emergency aid was clearly needed—overall, 34 percent of students experienced food insecurity, 47 percent experienced housing insecurity, and 14 percent experienced homelessness. Rates were higher at two-year and four-year colleges and highest among Black and Latinx students, irrespective of sector (Table 1). Some students did not apply for emergency aid and thus did not receive it, while others applied and were denied. A few students did *not* apply for emergency aid yet received it anyway, while most who received aid did apply for it.

<<<Table 1 about here>>>

We considered the patterns of emergency aid actions (i.e., who applied, who received) according to whether the students were experiencing basic needs insecurity. Most students did not apply for emergency aid and did not receive support. This includes 74 percent of students experiencing basic needs insecurity, and 84 percent of students who were not experiencing basic needs insecurity (yet may have needed help to meet their expenses). Denials do not appear to have been a major issue—only 5 percent of students experiencing basic needs insecurity applied for emergency aid but did not receive it. This is very unusual and is likely a consequence of the largess of the federal support—prior to the pandemic, emergency aid funds fell well short of demand and many students were denied.

Just 17 percent of students evidencing food and/or housing insecurity secured federal pandemic emergency aid. That number was lower at two-year colleges compared to four-year colleges (i.e., 15 vs. 20 percent), where students were less likely to apply for support. Black students were notably much *more* likely to apply for and receive support—the Black/White gap in applications is 7 percentage points at

two-year colleges (favoring Black students) and 14 percentage points at four-year colleges. The corresponding gaps in odds of receiving support are also substantial (i.e., 3 percentage points at two-year colleges and 8 percentage points at four-year colleges). Critically, while Black students were much more likely than White students to experience basic needs insecurity, this differential pattern in emergency aid behaviors holds conditional on need. In other words, Black students did not apply and receive emergency aid at much higher rates than White students simply because they needed it more. However, the patterns of emergency aid actions are less consistent when comparing Latinx students and White students, and the gaps between Latinx and Black students are relatively small. Therefore, we examine each type of administrative burden by students' race and ethnicity in subsequent analyses.

Learning Costs in Federal Pandemic Emergency Aid

Students who apply for emergency aid first are not necessarily those who need it the most. In fact, students who apply for support earlier are often those already advantaged by "college knowledge" (Conley 2008). Substantial outreach to secure widespread and diverse applications is often required to reach students with need, who often face the greatest burden in understanding whether they will gain access to the program.

Publicizing the availability of CARES funding to students should have been simple and straightforward, ideally aided by widespread media coverage. Nearly all institutions reported that they used some combination of institution websites or word of mouth (100 percent), faculty mentions (99 percent), and social media (98 percent) to make students aware of their smaller emergency aid programs. Only a small fraction (13 percent) of institutions put information about emergency aid on their student learning management system portals.

The ED's ever-shifting guidance also influenced administrators' willingness and ability to advertise funds (National Association of Student Financial Aid Administrators 2020). It was difficult to tell students exactly when dollars would be available and how much they would receive, particularly as eligibility criteria evolved (National Association of Student Financial Aid Administrators, National Association of Student Personnel Administrators, and MDRC 2021). Irrespective of how they heard about

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the availability of funds, around one-third of students had difficulty learning whether they would be awarded support. Other researchers also heard that students would have liked to get more frequent communication from the financial aid office during the pandemic (Blankstein 2020). In general, students felt that communication with their colleges could be improved across the board and expanded to different mediums. In the words of a Texas community college student, "Information should be disbursed when programs or benefits are available. You should not feel like a burden for asking if a program or benefit is available."

However, learning costs may not have kept students from receiving emergency aid they needed. We examined learning costs among students who faced basic needs insecurity and considered how those costs relate to their emergency aid actions. If learning costs were a main barrier, we would expect to see students facing those costs less likely to apply for or receive support. But that is not the case. Eighty percent of students who applied for emergency aid faced a learning cost—73 percent did not think they were eligible, 50 percent did not know how to apply, and 49 percent did not know emergency aid existed as a resource—yet applied anyway (Table 2). These problems were *not* more prevalent among students with basic needs insecurity who did not apply—in fact those students were *less* likely to face those barriers.

<<<Table 2 about here >>>

This unexpected result may be due to the sample; it is restricted to students who completed the survey—this may be a particularly advantaged (i.e., more in-the-know or resourceful) group of students who overcame learning costs to apply for support anyway. We also find some indication that students who applied for aid are those who are often targeted by programs for additional support. Compared to non-applicants, emergency aid applicants are disproportionately female, Black or Latinx, more likely to have children, and receive the Pell Grant (Table 3). Student support service programs on many campuses engaged in a great deal of outreach to these students during the pandemic (Achieving the Dream 2021; Weissman 2021). It may be that while students did face challenges learning about the availability of emergency aid, those barriers were (sometimes or often) overcome.

<<<Table 3 about here>>>

Learning costs were more prevalent among students at four-year colleges compared to two-year colleges (Table 4). Further, Latinx students encountered learning costs more often than Black or White students at both two-year and four-year institutions. Awareness of emergency aid programs was especially challenging for Latinx students, and, at two-year colleges, they also were more likely to struggle with how to apply.

<<<Table 4 about here>>>

Compliance Costs in Federal Pandemic Emergency Aid

Institutions varied in how they assessed eligibility by way of rules and regulations, which emerged as one of the most controversial aspects of the CARES program. Some decided that due to both federal guidance and equity concerns, they would rely on the FAFSA and standard needs assessment analyses, including determinations for Pell Grant eligibility. About three in five institutions surveyed took this approach, though only a fraction (about 10 percent) used administrative data to determine eligibility for their philanthropically funded emergency aid programs. Some staff were frustrated by the federal requirement that they restrict support only to Title IV eligible students. One person said, "Your immigration status has nothing to do with your need."

Some colleges created and published eligibility charts, often based on EFC and enrollment status. Administrators reported that this took them less time, and they received fewer questions from students, giving the impression that the process was understood. An administrator shared: "We realized that having an application would cause a lot of bottlenecks by having variation in awards. Students don't always know what they need or what the parameters are. There could have been benefits to individualization, but giving a blanket award was much, much faster." Other institutions were concerned that information about a student's EFC was outdated, since it was determined before the pandemic began; that even students well above the Pell Grant threshold were struggling. One-third of colleges used enrollment status (i.e., full-time versus part-time) as a proxy for need and used it to calculate how much students would receive. Although, one staff member questioned the wisdom of relying on administrative records, "You can look

at EFC, but some students had high EFCs and are struggling because they lost their job. So, if something happened right now, during the pandemic, how useful is EFC?"

Using an application created specifically for emergency aid purposes allowed institutions to collect updated information from students but ran the risk of introducing new barriers that some students might not be able to overcome. Still, most administrators—even those who used financial aid data as a key determinant—relied on applications to assess need among a percentage of students. These applications ranged from simple documents verifying need was brought about by the pandemic to long forms requiring students to detail their financial challenges. Very few programs appear to have systematically assessed students' basic needs using validated instruments. Also, while most applications were available online—representing a major change from before the pandemic—few colleges or universities (only about one in five) employed an algorithm of any type to score the application and determine eligibility.

The most notable shift when scaling emergency aid was that institutions stopped requiring students to meet with a staff member to obtain support. Half of the institutions surveyed implemented that requirement for their philanthropically funded emergency aid, while only 10 percent required it for CARES aid. This may have been due to a philosophical shift or simply have been pragmatic, as staff were often unavailable or overworked due to the pandemic.

Overall, relatively few students found completing the emergency aid application difficult. Nonetheless, that compliance cost does seem to have inhibited access to aid for some students who needed it. Among students experiencing basic needs insecurity, 11 percent of students who did not complete the application said they had trouble completing it. Sixteen percent of students who completed the application had difficulty with it but finished anyway. However, challenges completing the application do not appear to differentiate recipients from non-recipients which suggests that if they managed to finish it, the information students provided was sufficient (Table 2).

Students at two-year institutions were much more likely than those at four-year institutions to struggle to complete the application (12 percent vs. 9 percent; Table 4). Among two-year college students,

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Latinx (16 percent) and Black (13 percent) students were much more likely than White students (8 percent) to have difficulty completing the application—though again, they were equally likely to complete it. At four-year colleges, Latinx (8 percent) students struggled with the application less often than Black (11 percent) or White (9 percent) students.

After initial start-up decisions are made, multiple aspects of emergency aid delivery systems must still be chosen, many of which are potentially time-consuming, including:

- Marketing programs in ways that reach students;
- Allowing students time to complete applications;
- Providing institutions time to process applications or identify students using administrative data;
- Selecting eligible students;
- Notifying aid recipients;
- Distributing funds to students;
- Answering students' questions and concerns about financial awards, including processing appeals;
- Meeting program reporting and evaluation requirements; and
- Refining and improving delivery systems on a rolling basis.

Staffing for emergency aid programs rarely includes dedicated personnel with staff usually having other primary responsibilities (Kruger, Parnell, and Wesaw 2016). During the pandemic, multiple administrators and staff members were recruited to assist with aid programs despite having little prior experience or preparation. This is not entirely surprising as running emergency aid programs is not a topic covered in most educational programs that prepare people for careers in higher education.

Wait time is another compliance cost students faced. Speed is critical in an emergency, and many institutions struggled to help students quickly. Confronted with widespread need, the institutions that successfully delivered aid to as many students as possible were generally more equitable in their allocation, with efficiency measured most accurately by looking at time.

As a result, the speed with which CARES funds were distributed varied widely. The average time elapsed between application and award disbursal was 13 days (assessed on a 7 day/week calendar, not limited to business days), while colleges at the 25th percentile averaged 9 days and those at the 75th averaged 16 days (Table 5). The three steps in the process took varying lengths of time:

- Institutions took an average of 5 days to reach a decision about an applicant's request following receipt of their application. This timeline was rarely less than 2 days and sometimes more than 7.

- Notifying students after a decision was reached took an average of 3 days and was rarely completed in a day, sometimes taking a full week.

- Distribution of funds to students occurred an average of 4 days following notification.

The average time for the entire process was the same at two-year and four-year colleges but the range differed. The fastest two-year colleges were a bit faster than the fastest four-year colleges (8 days vs. 9 days) and the slowest were slower at four year-colleges (17 days vs. 16 days). We examined whether there were differences in wait time experienced by students depending on their race and ethnicity and found that there was not (results not shown but available from the authors).

<<<Table 5 about here>>>

Institutions generally prioritized responsiveness with shifting federal guidelines cited as the greatest barrier to moving funds quickly to students. Nonetheless, staff did what they could, with some faring better than others. Colleges whose leaders rapidly empowered financial aid and student support services staff to design and administer CARES programs moved quicker than colleges that required committee approval for decisions on eligibility or application approval. Staff at colleges with more complex application processes described months full of stressful days, including weekends, spent administering CARES programs. These colleges were also more likely to face delays from students needing additional help understanding application questions or being confused by the outcome of the review process.

Psychological Costs in Federal Pandemic Emergency Aid

In contrast to learning and compliance costs, psychological costs appear to play a substantial role in access to federal pandemic emergency aid. Our survey attempted to measure the stigma and stress surrounding emergency aid application. Considering the initial confusion about eligibility and ED's guidance discussed above and the everyday strain and grief of an on-going pandemic, the magnitude of psychological costs are not surprising.

Eighty-two percent of students with basic needs insecurity that did not apply for emergency aid experienced at least one type of psychological cost (Table 6). In comparison, 79 percent experienced a learning cost and 11 percent experienced a compliance cost (Table 2). Students who applied for emergency aid were less likely to experience psychological costs (72 percent vs. 82 percent), yet the rate was still quite high.

Among students experiencing basic needs insecurity but not applying for emergency aid, White students were the *most* likely to experience psychological costs. Eighty-eight percent of White students experienced a psychological cost, compared to 82 percent of Latinx students, and 69 percent of Black students (Table 6). Psychological costs were higher at four-year colleges as compared to two-year colleges (reaching as high as 91 percent among White students at four-year colleges), but the sizable nature of the racial disparities remained the same. In other words, these costs were prevalent but more often felt by students in most of the higher education—at both two-year and four-year colleges (Table 6).

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The most common type of measured psychological cost was the sense that other people needed the support more than the student did. Almost three-quarters of non-applicants felt this way as did nearly two-thirds of emergency aid applicants (Table 2). White students were much more likely than Latinx or Black students to feel this way, and the sentiment was more common at four-year colleges (Table 6).

The second most common challenge—and the one that most differentiated applicants and non-applicants—was the individual's sense that they did not need emergency aid. This may be true—despite experiencing food and/or housing insecurity (as assessed on the survey) they may have felt they had the

situation under control or that emergency aid would not be useful. However, it is also possible that they had difficulty admitting their need. More than half of non-applicants (56 percent) said they did not need emergency aid compared to 36 percent of applicants—who clearly applied anyway (Table 2). This was particularly common among White students and those at four-year colleges, including 71 percent of White non-applicants at four-year colleges. In comparison, only about a third of Black non-applicants at two-year colleges who didn't apply for support despite evident need said that they did not need help (Table 6).

Stigma, often induced by what a program offers or how it is offered, is another type of psychological cost some potential program recipients experience. We assessed the role of stigma via two measures, examining agreement with the statements "I am embarrassed to apply" and "People like me don't use programs like that." In this sample, only about one in five students experiencing basic needs insecurity reported agreement with either statement. Whether or not this was a barrier to application is unclear. Applicants were more likely than non-applicants to agree with the first statement, experiencing embarrassment yet applying anyway (25 percent vs. 21 percent). But applicants were less likely than non-applicants to agree with the second statement, feeling that people like them would not use emergency aid (Table 2).

Also, racial differences in rates of stigma were less pronounced than for other types of psychological costs. At both two-year and four-year colleges, White and Latinx students exhibited stigma at similar rates and more often than Black students. At two-year colleges, across all racial groups, embarrassment was much more common than "People like me don't use programs like that," whereas for White and Latinx students (but not Black students) at four-year colleges, the opposite was true (Table 6).

However, when further disaggregated by gender, we observe some key differences in stigma. Latinx males at four-year colleges were more likely than their female counterparts to cite embarrassment as a reason for not applying (26 percent vs. 17 percent), whereas we see Latinx males at two-year colleges far more likely than their female peers to state that such programs are not used by people like them, 23 percent vs. 13 percent (Table 6). It may be that the two forms of stigma work somewhat differently, with

feelings of embarrassment easier to overcome than a sense of social pressure or norms. They may also depend on context.

Psychological costs also include— and contribute to— stress. Very few students (3 percent) who did not apply for emergency aid said that "applying for emergency aid was at least moderately stressful." This likely means they did not reach the stage of "applying" (in their minds) to consider its stress (Table 2). Among non-applicants, Black and Latinx students were more likely than White students to report experiencing stress during the process (Table 6).

However, 30 percent of students who applied for emergency aid experienced stress in the process. This was much less common (24 percent) among applicants who received emergency aid—this is the *only* evident form of administrative burden differentiating recipients and non-recipients among applicants.[4] In other words, while other types of administrative burden were more commonly experienced among students who applied for emergency aid, stress stands out as the key burden differentiating access to funds. Students with more stress were less likely to be funded when they applied for emergency aid, or students who received funds were less likely to report having found the process stressful. This may be because feelings of gratitude and/or relief overpower feelings of stress.

Institutional Variation in Administrative Burden

Colleges and universities varied in how they worked to minimize administrative burden. At the University of Hawai'i at Hilo (UH Hilo), consistently ranked as the most diverse four-year public university in the United States, students' urgent needs were prioritized using a streamlined approach. Staff had Title IV–eligible students complete a simple Google form for the first round of CARES aid reiterating ED requirements. Students could apply for aid both semesters and received $750 the first term, unless they did not need the full amount, and $400 the next term, due to diminishing funds. CARES funds were supplemented with philanthropic support, and it took an average of just 13 days for students to receive support. In the words of a UH Hilo administrator: "We took their word as verification. It would have been too much volume and burden to ask them for evidence… I don't think that asking students to justify the impact of COVID on them is fair. You have people that haven't been receiving unemployment for a year.

We need to break down as many barriers as we can, treat students with dignity, and extend grace wherever we can."

Sometimes administrative burden arose due to capacity constraints—in terms of content expertise, available systems, and staffing. One college staff member said: "We were running a triage operation 24 hours a day. We had to assess, determine, distribute emergency aid based on a student's needs and timetables. Sometimes emergencies came up at night or on a Saturday, and we had to adjust to meet those needs. This is what we signed up for and this is who we serve."

At Grambling State University (GSU), an Historically Black institution in Louisiana, staff decided to keep things simple. Since the ED required eligible students to claim their life was disrupted due to the pandemic, GSU placed that question in the student portal and asked all Title IV–eligible students to complete it. "We made our application very simple and straightforward… the pandemic exacerbated [students'] challenges, so we didn't want to have a 17-question survey that asked them what we already knew," said one GSU administrator. To help ensure students answered the question, the university offered a simple one-question survey.

In the spring of 2020, students who answered yes to that single question received aid, $900 if they were full-time and $800 if they were half-time undergraduate. Graduate students were given $700 if they were full-time and $600 if they were half-time. In the spring of 2021, students who could not receive federal support were given institutional emergency aid. In the words of a staff member, "We told students, even if you don't have a FAFSA on file, we're giving you money because we love you."

In a very small number of instances, colleges reduced common forms of administrative burden by outsourcing emergency aid implementation to a third-party vendor, Edquity. That technology-assisted platform, which the lead author of this paper helped develop, strives to reduce application and compliance costs several ways. First, students apply on an app that uses student-centered design principles to assess need quickly and efficiently. Second, decisions are automated using a proprietary algorithm that triages applications, orders them according to level of need, and breaks ties using randomization. This approach is recommended over a "first-come, first-served" model, according to a New England Journal of Medicine

article published during the pandemic: "In the face of time pressure and limited information, random selection is preferable to trying to make finer-grained prognostic judgments within a group of roughly similar patients" (Emanuel et al. 2020, 2053). Ranking and randomizing when the supply of funds is inadequate to serve all similarly prioritized people would seem more equitable. Third, Edquity requires minimal verification; only a student ID must be provided—no receipts or other proof of need is required. Using the Edquity app, most students can apply for and receive aid within 48 hours, 7 days a week.

Does Edquity's approach effectively reduce administrative burden and improve student outcomes? There is anecdotal evidence to suggest that it does, though perhaps inconsistently (Douglas-Gabriel 2021; Mulhere 2021). An evaluation of its use during the pandemic at Compton College concluded that delivering $250 in emergency aid using the app appeared to double the odds that Compton students completed a degree or certificate by the end of summer 2020 (Anderson 2021).

Conclusions and Recommendations

Despite the barriers to emergency aid students faced, federal reporting indicates that more than eight million students received emergency aid from the CARES Act (Madoo and Bennett 2021). Providing support at that scale appears important and useful. For example, students believed the extra CARES funds helped them stay on track, as:

- 69 percent said emergency aid increased their chances of graduating;

- 82 percent said emergency aid increased their personal well-being;

- 76 percent said emergency aid made them feel that their college cared about them;

- 70 percent said emergency aid made them feel that their college understood them;

- 68 percent said emergency aid made them feel that their college respected them; and

- 64 percent said emergency aid increased the chances they would support their college as alumni (Goldrick-Rab et al. 2021c).

In surveys, students shared stories. One said, *"Emergency aid helped me avoid eviction and allowed me to purchase food."* Another reported, *"It helped with internet and utilities for school. It allowed me to not have to work overtime after being sick."*

The need for emergency aid is likely to continue, as students face financial shortfalls due to health, education, economic, and environmental crises. A college administrator we interviewed put it best, "I don't think emergency aid will be going away. Students will continue to have these problems." The federally funded emergency aid offered by the CARES Act was a watershed moment in American higher education financing. It was the first time that most colleges and universities had to move so quickly to meet the needs of millions of students in crisis—and they had the support of taxpayers to do it. Congress subsequently provided tens of billions of dollars in additional support for emergency aid through the Coronavirus Response and Relief Supplemental Appropriations Act in December 2020 as well as the American Rescue Plan in March 2021. Unfortunately, dollars are not all that is needed. When faced with an emergency, individuals need to access support quickly with minimal administrative burden.

To its credit, in spring 2021 the ED recognized administrative burden briefly in the Federal Register when discussing pandemic higher education emergency aid, noting:

> The broader definition of "student" adopted in these final regulations ensures those affected by COVID-19 expenses may access funding and continue their education and simplifies the administrative burden on institutions. The ED estimates that applying for the funds will cost students $22.4 million and administering the funds will cost institutions approximately $1.2 million (Eligibility to Receive Emergency Financial Aid Grants to Students Under the Higher Education Emergency Relief Programs, 2021).

Information on the computations underlying those calculations was not provided. The ED only indicated that this $23.6 million was an assessment of paperwork burden (Eligibility to Receive Emergency Financial Aid Grants to Students Under the Higher Education Emergency Relief Programs, 2021).

There are many other types of burdens at risk in the program—most notably psychological burden. The evidence that psychological costs inhibited access to emergency aid during the pandemic stands in contrast with other evidence that these challenges rank relatively low on the list of barriers students confront in gaining access to support for their basic needs. The Hope Center's annual survey has shown that learning costs are the primary challenge students face—they do not know about programs or how to access them and thus do not apply (Goldrick-Rab et al. 2020; The Hope Center for College, Community, and Justice 2021). Interventions to address learning costs, including nudging, are effective

and increase students' odds of obtaining support (Goldrick-Rab et al. 2021a; Goldrick-Rab et al. 2021b). In contrast, interventions to address psychological costs appear to do little (Goldrick-Rab et al. 2021a). Although, it seems that federal pandemic emergency aid was better advertised than typical basic needs support, perhaps enough so to minimize the impacts of those barriers. Instead, psychological costs were more problematic. Eight in ten students who experienced basic needs insecurity but did not apply for emergency aid experienced a psychological cost. Feeling that other students needed the aid more, or simply feeling that they did not need emergency aid at all, were the most common psychological burdens students faced. This suggests that colleges and the government must do more to normalize receiving support, particularly during emergencies when many are suffering, and students may believe that others have more dire need. There is some evidence that two-year colleges and minority-serving institutions may have made strides toward creating such a culture; two-year students, along with Black and Latinx students, were less likely than their four-year and White peers to feel that they were undeserving of aid. Eliminating the requirement that students seek out support—and simply auto-awarding aid—would also decrease psychological burden on students.

There is much more administrative burden at work in federal pandemic emergency aid, but it may be especially difficult to alleviate as problems continue to emerge. Administrative burden is often imposed based on the belief that without it there would be widespread cheating in a program. The Pell Grant program has a very low rate of such problems (Goldrick-Rab 2016b) but in late 2021, new challenges arose. Fake student bots began registering in classes through California Community Colleges, the second largest higher education system in the nation (Burke 2021; Shalby 2021). Some managed to access both the federal and state financial aid systems, drawing down a great deal of support, including emergency aid. Thomas Peele, Ashley A. Smith, and Larry Gordon (2021) reported on breaches which represented a loss of hundreds of thousands of dollars to fake students or bots seeking financial aid from California's community colleges. In addition, there was the potential for much more money given that the system's 115 traditional colleges, enrolling about 1.8 million students, are in the midst of distributing

more than $1.6 billion in federal COVID relief aid. This fraud creates additional challenges for advocates of simplifying applications and reducing verification processes.

Nevertheless, emergency aid programs must advance. To prevent a pandemic funding cliff, which could be particularly harmful to students as it appears it will arrive as states cut appropriations to higher education, Congress should pass legislation (e.g., the Emergency Grant Aid for College Students Act) to make emergency aid a permanent feature of federal higher education financing.[5] It is equally important that Congress provide annual financial assistance to higher education institutions to build and maintain emergency aid programs that are agile, equitable, and impactful. The ED should issue guidance explicitly aimed at minimizing administrative burden in the programs. For example, the ED could reduce application costs by forbidding the use of the FAFSA to determine access to emergency aid and permitting the receipt of aid by students who: a) cannot file a FAFSA, b) are in dual-enrollment or non-credit programs, c) are undocumented, and d) are no longer enrolled.

The ED could also offer technical assistance to help institutions implement equitable application and allotment procedures and to decrease distribution time. Waivers for Federal student aid requirements would ease procurement processes necessary for emergency aid partnerships. Also, they might create incentives for colleges and universities to measure how long each step of the emergency aid process is taking and work to reduce that time.

Continuing to improve the implementation of emergency aid programs while also working to sustain them with federal support is critical to both recovering from the pandemic and improving degree completion going forward. Foundations of the traditional financial aid system may not be the best starting point for this work, and institutions need systems and processes to combat administrative burdens and be effective in the future.

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TABLE 1. DISTRIBUTION OF BASIC NEEDS INSECURITY AND FEDERAL PANDEMIC EMERGENCY AID BEHAVIOR, BY SECTOR AND RACE

	Overall				Two-Year Colleges				Four-Year Colleges			
		By Race/Ethnicity				By Race/Ethnicity				By Race/Ethnicity		
	All Students	White	Black	Latinx	All Students	White	Black	Latinx	All Students	White	Black	Latinx
Number of students	2,231,053	922,823	220,170	516,632	1,315,527	455,951	117,038	400,672	915,526	466,871	103,133	115,960
	%	%	%	%	%	%	%	%	%	%	%	%
Basic Needs Insecurity												
Experiencing any basic needs insecurity	57	52	69	63	60	54	72	63	53	49	65	59
Food insecurity	34	28	46	39	37	33	49	40	29	24	42	36
Housing insecurity	47	42	58	53	50	45	63	55	42	39	53	47
Homelessness	14	14	18	12	13	14	18	12	15	14	18	14
Emergency aid behavior, among those experiencing basic needs insecurity												
Did not apply and did not receive	14	19	13	12	12	16	12	11	17	22	14	15
Applied but did not receive	4	3	5	4	4	3	5	4	3	3	5	2
Did not apply but received	3	4	4	2	2	3	3	1	4	5	5	5
Applied and received	17	17	22	17	15	15	18	17	20	19	27	18
Emergency aid behavior, among those not experiencing basic needs insecurity												
Did not apply and did not receive	22	29	22	18	20	28	20	18	25	31	23	21
Applied but did not receive	2	2	2	2	2	1	2	3	2	2	3	1
Did not apply but received	3	4	5	3	3	3	4	2	5	4	6	6
Applied and received	9	8	15	11	8	7	11	10	11	10	18	14

Source | 2020 #RealCollege Survey. Author's calculations.

Notes | Estimates weighted to represent students enrolled in credit-bearing courses in Fall 2019.

TABLE 2. TYPES OF ADMINISTRATIVE BURDEN AMONG STUDENTS EXPERIENCING BASIC NEEDS INSECURITY WHO APPLIED OR RECEIVED FEDERAL PANDEMIC EMERGENCY AID, BY TYPE AND STUDENT BEHAVIOR

	Student Behavior			
			Received Aid	
Types of Administrative Burden	Did Not Apply For Aid	Applied For Aid	Did Not Apply	Applied
Number of students	211,784	260,317	34,081	199,562
	%	%	%	%
Any learning costs	79	80	82	79
I do not think I am eligible	74	73	74	72
I do not know how to apply	43	50	48	49
I do not know they existed or were available	40	49	47	48
Compliance costs				
I had difficulty completing the application	11	16	9	15
Any psychological costs	82	72	80	73
Other people need those programs more than I do	73	65	72	66
I do not need these programs	56	36	48	37
I am embarrassed to apply	21	25	23	25
People like me do not use programs like that	20	16	19	16
Applying for emergency aid was at least moderately stressful	3	30	3	24

Source | 2020 #RealCollege Survey. Author's calculations

Notes | Estimates weighted to represent students enrolled in credit-bearing courses in Fall 2019.

TABLE 3. CHARACTERISTICS OF STUDENTS EXPERIENCING BASIC NEEDS INSECURITY WHO APPLIED OR DID NOT APPLY FOR FEDERAL PANDEMIC EMERGENCY AID, BY STUDENT BEHAVIOR

	Student Behavior			
	Did Not Apply For Aid	Applied For Aid	Received Aid	
			Did Not Apply	Applied
Selected Student Characteristics				
Number of students	211,784	260,317	34,081	199,562
	%	%	%	%
Gender identity				
Female	63	67	71	67
Male	35	32	26	32
Non-binary/Third gender	3	2	3	2
Prefer to self-describe	1	1	1	1
Prefer not to answer	1	1	1	1
Racial or ethnic background				
White	58	44	58	46
Hispanic or Latinx	25	33	23	32
Black	14	20	21	19
Other Asian or Asian-American	6	5	5	5
Southeast Asian	3	3	3	3
American Indian or Alaskan Native	2	2	3	2
Indigenous	2	2	2	2
Pacific Islander or Native Hawaiian	2	2	1	2
Middle Eastern, North African, Arab, or Arab American	1	2	1	2
Other	2	2	1	2
Prefer not to answer	2	1	1	1
Parenting student	20	26	23	25
Pell Grant recipient	43	65	67	68

Source | 2020 #RealCollege Survey. Author's calculations.

Notes | Estimates weighted to represent students enrolled in credit-bearing courses in Fall 2019.

TABLE 4. PSYCHOLOGICAL COSTS FACTING STUDENTS EXPERIENCING BASIC NEEDS INSECURITY WHI DID NOT APPLY FOR FEDERAL PANDEMIC EMERGENCY AID, BY TYPE, SECTOR, AND RACE/ETHNICITY

Types of Administrative Burden	Overall				Two-Year Colleges				Four-Year Colleges			
		By Race/Ethnicity				By Race/Ethnicity				By Race/Ethnicity		
	All Students	White	Black	Latinx	All Students	White	Black	Latinx	All Students	White	Black	Latinx
	%	%	%	%	%	%	%	%	%	%	%	%
Any learning costs	79	80	80	80	77	76	75	78	82	84	84	87
I do not think I am eligible	74	76	74	72	71	72	70	68	78	80	78	80
I do not know how to apply	43	42	46	45	40	36	42	44	45	46	51	48
I do not know they existed or were available	40	37	47	43	39	35	47	40	40	39	48	48
Compliance costs												
I had difficulty completing the application	11	8	12	13	12	8	13	16	9	9	11	8

Source | 2020 #RealCollege Survey. Author's calculations.
Notes | Estimates weighted to represent students enrolled in credit-bearing courses in Fall 2019.

TABLE 5. WAIT TIMES EXPERIENCED IN FEDERAL PANDEMIC EMERGENCY AID, BY SECTOR

Stage in Process (in days)	Average Time	25th Percentile	75th Percentile
Overall			
Time from application to decision	5	2	8
Time from decision to notification	3	1	7
Time from notification to distribution	4	2	7
Total time elapsed	13	9	16
Two-Year Colleges			
Time from application to decision	4	1	7
Time from decision to notification	4	1	7
Time from notification to distribution	5	2	8
Total time elapsed	13	8	16
Four-Year Colleges			
Time from application to decision	6	4	8
Time from decision to notification	3	1	5
Time from notification to distribution	4	2	7
Total time elapsed	13	9	17

Source | 2020 #RealCollege Survey. Author's calculations.

Notes | Processes that took less than one day were coded as 0.5 day and more than 7 days as 8 days.

TABLE 6. PSYCHOLOGICAL COSTS FACING STUDENTS EXPERIENCING BASIC NEEDS INSECURITY WHO DID NOT APPLY FOR FEDERAL PANDEMIC EMERGENCY AID, BY TYPE, SECTOR, RACE/ETHNICITY, AND GENDER

Type of Administrative Burden	Overall				Two-Year Colleges				Four-Year Colleges			
	All Students	By Race/Ethnicity			All Students	By Race/Ethnicity			All Students	By Race/Ethnicity		
		White	Black	Latinx		White	Black	Latinx		White	Black	Latinx
Number of students	211,784	113,464	27,797	48,671	109,650	49,398	13,522	34,218	102,134	64,066	14,275	14,454
	%	%	%	%	%	%	%	%	%	%	%	%
Any psychological costs	82	88	69	82	79	85	66	80	85	91	72	86
Other people need those programs more than I do	73	79	61	73	70	75	58	71	76	81	63	79
I do not need these programs	56	66	40	48	50	59	34	44	62	71	46	57
I am embarrassed to apply	21	21	18	23	23	22	21	24	19	20	16	20
People like me do not use programs like that	20	22	14	19	18	18	14	17	22	25	13	23
Applying for emergency aid was at least moderately stressful	3	2	4	4	4	2	4	4	3	2	5	4
Female Students												

Any psychological costs	82	88	70	81	79	84	67	79	85	92	72	86
Other people need those programs more than I do	74	80	61	74	71	75	58	71	77	84	63	80
I do not need these programs	55	64	42	48	48	56	36	43	61	70	47	59
I am embarrassed to apply	20	20	18	21	22	22	20	23	18	19	16	17
People like me do not use programs like that	18	21	13	16	15	16	13	13	21	25	13	22
Applying for emergency aid was at least moderately stressful	3	2	4	4	3	2	3	4	3	2	5	3
Male Students												
Any psychological costs	84	89	66	82	82	86	61	82	87	91	72	83
Other people need those programs more than I do	72	75	61	72	71	76	57	70	73	75	65	77
I do not need these programs	59	70	36	49	53	64	27	48	66	73	45	52
I am embarrassed to apply	24	23	19	25	26	24	23	24	21	22	15	26
People like me do not use programs like that	24	25	14	24	24	23	17	23	25	26	12	26

Applying for emergency aid was at least moderately stressful	4	2	5	5	5	3	6	4	3	2	4	5

Source | 2020 #RealCollege Survey. Author's calculations.

Notes | Measure of stress also includes those who applied to their college's non-federal emergency aid program. Estimates weighted to represent students enrolled in.

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[1] While Congress created HEERF through the CARES Act, it provided tens of billions more through the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 and the American Rescue Plan Act as well, totaling over $30 billion specifically in student emergency aid. See: U.S. Department of Education. (2021, August). CRRSAA: Higher Education Emergency Relief Fund (HEERF II); U.S. Department of Education. (2021, September). ARP: American Rescue Plan (HEERF III).

[2] This amount, referred to as the Higher Education Emergency Relief Fund, is roughly half of the available funds under Sections 18004(a)(1) and 18004(c) of the CARES Act. See: Coronavirus Aid, Relief, and Economic Security Act, Publ. L. No. 116–136. (2020).

[3] Under current law, students were not Title IV eligible if they had not registered for selective service or had a minor drug conviction. Those restrictions were changed in 2021. See: Department of Education, Office of Postsecondary Education. (2021, June 17). Early implementation of the FAFSA Simplification Act's removal of requirements for Title IV eligibility related to selective service registration and drug-related convictions. *Federal Register*.

[4] Our measure of stress refers to both federal and colleges' regular emergency aid programs. It is therefore possible that this difference is due to the typically more complex application used in these regular emergency aid programs compared to those used for the federal program.

[5] See: Congress.gov. (2020, August). S.4465 Emergency Grant Aid for College Students Act.