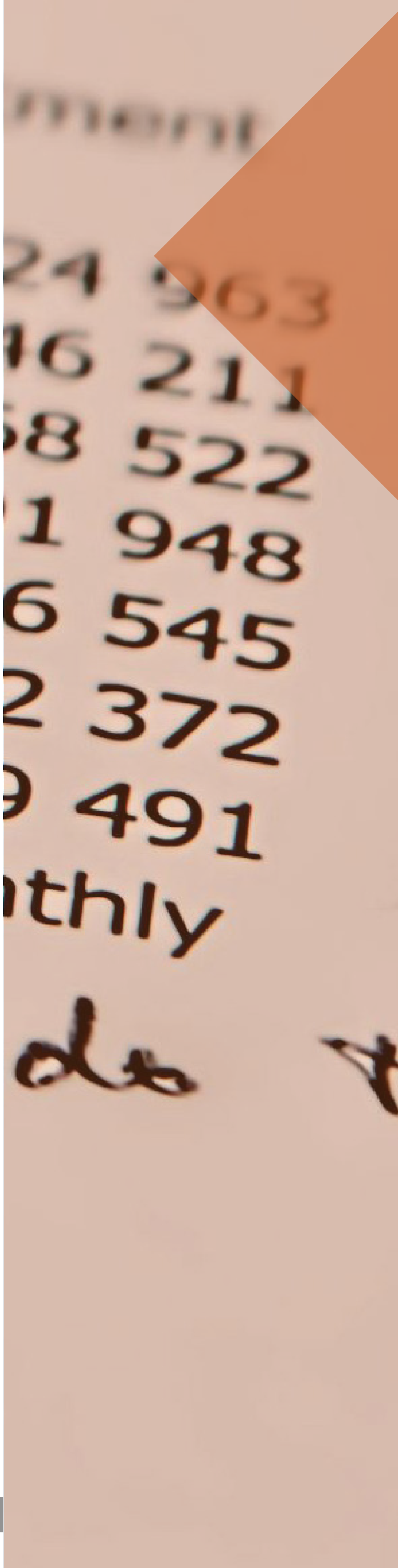
COLLEGE COSTS UNCOVERED:

An Examination of the Accuracy of College Cost of Attendance Budgets and Implications for Student Success

October 2024

JBAY
JOHN BURTON Advocates *for* Youth



ACKNOWLEDGMENTS

Authored by Maegan Mattock, Debbie Raucher, and Laura Szabo-Kubitz, this report is intended to be a resource for institutions of higher education across California—and nationally—to ensure cost of attendance (COA) budgets accurately capture what students must pay to attend and succeed in college. The authors would like to thank the representatives of the California public higher education systems, colleges, and universities, and the California Student Aid Commission, who shared valuable insights about how COA budgets are constructed and adjusted, and their impact on college student affordability and success. We would also like to thank Dr. Robert Kelchen, professor and head of the Department of Educational Leadership and Policy Studies at the University of Tennessee, Knoxville, who studies COA and took the time to review this report and provide feedback. The authors are grateful to the Angell Foundation, College Futures Foundation, and Kresge Foundation for their generous support of this research. The perspectives presented in this report represent those of the authors and do not necessarily reflect the views or opinions of the contributors and reviewers.

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EXECUTIVE SUMMARY

COA BUDGETS ARE CRITICAL TO STUDENT SUCCESS BECAUSE THEY DETERMINE THE MAXIMUM AMOUNT OF FINANCIAL AID STUDENTS CAN RECEIVE

College Costs Uncovered seeks to illuminate the role that higher education institutions' cost of attendance (COA) budgets play in determining whether students have access to the financial aid they need to succeed and the steps that institutions and California can take to ensure COA budgets most accurately reflect students' expenses. COA budgets are critical to student success because they determine the maximum amount of financial aid students can receive, and while COA categories are set by the federal Higher Education Act, institutions have flexibility in how they determine the expected cost for each.

If the COA budget does not accurately reflect a student's expenses, the amount of aid they are eligible to receive will be less than their actual expenses—requiring that they cover the difference through savings, support from family and friends, work, private borrowing, reducing their enrollment in classes, or even dropping out entirely. This is problematic for all students and especially for low-income students who may not have the same access to intergenerational wealth as their wealthier peers. Additionally, it inordinately impacts special populations like students with experience in foster care and student parents who often face additional costs that are not reflected in their COA. These students may have access to more financial aid and therefore are more likely to have reached their COA limit and be forced to turn away available financial aid.

Regardless of how systems or higher education institutions set COA budgets, the federal government has granted financial aid administrators the authority to use professional judgment to make COA adjustments for individual students on a documented, case-by-case basis. Under the recently enacted FAFSA Simplification Act, all institutions are now required to take steps to promote professional judgment and are no longer allowed to deny all requests of a specific type or set deadlines by which students must submit requests.

To date, there is limited academic research on COA. However, the research that does exist highlights the complexity and challenges of developing accurate COA budgets. In particular, the research notes the widespread lack of clarity around how COA is calculated, exploring the absence of transparency and consistency in data sources and processes used to develop these calculations across institutions. While researchers agree more consistency, accuracy, and oversight is needed, there is little agreement on what a more accurate process would look like.

To assess the accuracy of the COA budgets used by the 134 public colleges and universities in California that make their COA budgets available online, JBAY developed a methodology using publicly available data sources to estimate actual non-tuition costs for students living off-campus independently, including variations by location, that were then compared to publicly posted COA budgets. To better understand how both COA budgets are determined and how COA adjustments are handled, the report authors interviewed financial aid administrators and foster youth program staff from eight public colleges and universities across the state and the three California public higher education systems. Foster youth program staff were included given the disproportionate impact of COA limitations on these students.

The analysis identified the following:

- Over half of colleges use COA budgets that are lower than estimated regional costs, with some underestimating by more than $10,000.
- There is no universal methodology for calculating non-tuition costs, leading to large inconsistencies across institutions including those located in the same geographic area.
- Colleges do not typically make information about how COA figures are calculated accessible, and some colleges rely on a net price calculator tool rather than post COA budgets.
- At almost one-third of colleges, COA budgets have not kept pace with inflation.
- Getting information about whether COA adjustments are allowed and the process for requesting such adjustments is difficult, and many institutions are likely out of compliance with recently enacted federal changes.
- There is a wide variation in financial aid administrators' attitudes about COA budgets and willingness to think creatively about COA adjustments.

To ensure students have access to the financial aid they need to be successful college students, the report makes the following recommendations.

Colleges should:

- Be transparent about expenses included in COA budgets and utilize multiple sources to calculate them, erring toward higher numbers where there is variation.
- Broadly define the allowable bases for making COA adjustments.
- Clearly advertise their policy for making COA adjustments on their website and in financial aid award letters.
- Confirm all COA policies and practices comply with statutory requirements (particularly in light of recent federal changes).

California should:

- Ensure that all college and university systems establish a consistent and clear methodology to develop campus COA budgets that reflect the needs of student populations.
- Create a requirement to support students' access to COA adjustments by requiring that institutions (1) prominently display information about COA adjustments in transparent and understandable language on key web pages and in financial aid award letters; (2) specify the types of adjustments that must, at a minimum, be considered; and (3) require that institutions accept a documented conversation between a student and financial aid administrator about the student's need for a COA adjustment as sufficient documentation when obtaining written documentation is challenging or not feasible.
- Adequately fund financial aid office administration to have the staff and capacity to construct accurate COA budgets, as well as make COA adjustments in a timely manner for students who request them.

The report also uplifts promising practices at CSU, Dominguez Hills, which has established a Financial Aid and Affordability Task Force, and **Glendale Community College**, which actively encourages students facing a variety of special circumstances to apply for a COA adjustment.

Cost of attendance is an issue that historically has gone largely unexamined both in California and nationally. It is an issue, however, that is increasingly being raised by practitioners and California's public segments as an impediment to students' access to critically needed financial aid. Adopting the recommendations detailed in this report will enable California to move one step closer to ensuring that all students have an equitable opportunity to afford and successfully obtain their desired credential, and realize their life goals and aspirations.

INTRODUCTION

Without question, college is unaffordable for many students particularly for those with the least resources. Crucial work is being done to strengthen need-based financial aid to ensure all Californians can afford to earn a higher education credential without excessive work hours or debt. A less understood issue is higher education institutions' differing approaches to setting cost of attendance (COA) budgets, which impact how much financial aid students can receive. Too little is known about how COA budgets compare to what students actually pay, and what steps institutions and California can take to ensure COA budgets most accurately reflect students' expenses.

THIS REPORT SEEKS TO ILLUMINATE THE ROLE THAT COA PLAYS IN DETERMINING WHETHER STUDENTS HAVE ACCESS TO THE FINANCIAL AID THEY NEED, AND WHAT CAN BE DONE TO IMPROVE HOW COLLEGES AND UNIVERSITIES APPROACH THIS ISSUE.

This report seeks to illuminate the role that COA plays in determining whether students have access to the financial aid they need, and what can be done to improve how colleges and universities approach this issue. Through reviews of college financial aid webpages, analysis of COA budgets and publicly available data, and interviews with financial aid administrators and foster youth program coordinators, this report uplifts some of the challenges that this research revealed, including wide variation in how COA budgets are set and the extent to which they are adjusted when they do not reflect students' true costs.

What is cost of attendance (COA) and how is it determined?

The COA is an institution of higher education's determination of what a student has to pay to attend that college in a given year and includes both tuition and non-tuition expenses. The federal government requires that institutions create COA budgets for specific circumstances, including attendance status (e.g., full time, part time) and housing arrangement (e.g., living on campus, living with family, and living off-campus independently). The federal government also specifies the types of costs that must be included in the COA, which include tuition and fees; books, course materials, supplies, and equipment; transportation; food and housing (or living expenses); and miscellaneous personal expenses. Additional categories are also allowable for certain students, including a dependent care allowance for students who are parents, and costs related to a disability.[1] While these categories are set by the federal Higher Education Act, institutions have flexibility in how they determine the expected cost for each.

Colleges publish COA budgets for specified housing arrangements and attendance statuses, but there is little individualization beyond those circumstances. Standardizing the costs for diverse student populations presents a challenge as critical expenses that some students incur such as childcare and healthcare may not be included in budgets developed for the broader student population. Further, costs that are included often do not take geographic variations into account and may present budgets that are not reflective of the actual cost to live in the local community. Finally, students' varying life circumstances may lead to differences in costs that are not reflected in standard budgets. For example, a student who relies on a car to get to school will have different costs than a student who uses public transportation, and a student with dependents will require a larger housing unit than a single student without dependents.

The standardized approach to determining the COA can place an undue burden on students whose actual costs exceed the COA budget. These students must seek out adjustment policies and processes, if they are even aware of them, with no guarantee that their adjustment request will be granted. Without adequate financial aid to pay for both school and living expenses, students may have to consider difficult decisions such as reducing their academic unit load to work (and potentially further reducing their financial aid), taking out private loans that have fewer consumer protections, or even dropping out of school entirely.

THE STANDARDIZED APPROACH TO DETERMINING THE COA CAN PLACE AN UNDUE BURDEN ON STUDENTS WHOSE ACTUAL COSTS EXCEED THE COA BUDGET. THESE STUDENTS MUST SEEK OUT ADJUSTMENT POLICIES AND PROCESSES, IF THEY ARE EVEN AWARE OF THEM, WITH NO GUARANTEE THAT THEIR ADJUSTMENT REQUEST WILL BE GRANTED.

Institutions choose how to set amounts for each COA element utilizing a variety of sources, which may include estimates provided by the California Student Aid Commission (CSAC), federal and proprietary datasets, and student surveys. CSAC, for example, administers its Student Expenses and Resources Survey (SEARS) every few years, which interviews thousands of students at public and private institutions across California about their experiences paying for college.[2] CSAC uses data from these surveys to create Student Expense Budgets (SEBs) for the three living arrangements, which several California institutions— including many community colleges—use in lieu of setting their own budgets.[3]

A scan of institutions' COA budgets found that more than 30 percent use at least one cost element from CSAC's SEB for students living off campus independently and 25 percent use the budget in its entirety. In the years when the SEARS survey is not administered, CSAC updates estimated college costs based on expense-specific changes in the California Consumer Price Index, calculated using population-weighted growth in California metropolitan statistical areas (MSAs).

While SEARS surveys students from across the state and provides colleges with information that may be helpful—especially if they don't have the resources to conduct their own research—the statewide averages used in the SEBs mask regional differences, rendering estimates either higher or lower for students in a given area, depending on local costs of living. They also reflect students' actual rather than needed expenses, and so may not adequately meet students' basic needs. CSAC's 2023 Food and Housing Survey, which does ask students about their needed expenses but is not used to create SEBs, identified two-thirds (66 percent) of California college students as food insecure and over half (53 percent) as housing insecure.[4]

Each public postsecondary system in California takes a different approach to how COA budgets are calculated. The California Community Colleges (CCC) have the least standardization, with no systemwide universal recommended methodology. In 2020, the CCC Chancellor's Office provided colleges with regional data from the SEARS survey, but has not provided it since.[5] The California State University (CSU) Chancellor's Office provides individual campuses with SEARS survey data based on regional costs. Campuses also have the option to use their own figures, such as those identified through campus surveys, but must document how they derived them.[6]

The University of California (UC) system is notable in that it employs its own methodology to determine individual campus COA budgets for undergraduate students. The systemwide Education Financing Model steering committee, which includes administrative representatives, students, and faculty from all UC campuses, oversees the establishment of COA budgets using information from the UC's Cost of Attendance Surveys (COAS), which had a 28 percent response rate in 2023.[7] Its findings, along with administrative data for direct college costs—such as how much campuses charge for on-campus housing and meal plans—inform individual campuses' COA budgets for students living on campus, at home with family, and off campus independently.[8] Since 2017, the UC has conducted this survey biennially, with figures adjusted for inflation in the intervening years.[9] Each year the survey is conducted, it is reevaluated through feedback from student focus groups and a systemwide financial aid committee.

Driven by this feedback, the UC has made several adjustments to its COA determination processes in recent years. For example, the UC now substitutes the USDA moderate meal plan amount for survey respondents who don't have an on-campus meal plan and who report a number below this amount, in an effort to ensure its calculated costs are not too low. The UC adjusted overall non-tuition COA expenses upwards by nine percent between academic years (AY) 2022-23 and 2023-24, and by an additional nine percent for AY 2024-25.

COA Adjustments

Regardless of how systems or institutions of higher education set COA budgets, the federal government has granted financial aid administrators the authority to use professional judgment to make COA adjustments for individual students on a documented, case-by-case basis.[10] For example, if a student's rent is higher than what the institution has estimated, or if they are enrolled in coursework that requires books that cost more than what the college has budgeted, students can submit an appeal to increase the impacted component of their COA.

UNDER THE RECENTLY ENACTED FAFSA SIMPLIFICATION ACT, ALL INSTITUTIONS ARE NOW REQUIRED TO TAKE STEPS TO PROMOTE PROFESSIONAL JUDGMENT, AND ARE NO LONGER ALLOWED TO DENY ALL REQUESTS OF A SPECIFIC TYPE OR SET DEADLINES BY WHICH STUDENTS MUST SUBMIT REQUESTS.

Under the recently enacted FAFSA Simplification Act, all institutions are now required to take steps to promote professional judgment, and are no longer allowed to deny all requests of a specific type or set deadlines by which students must submit requests.[11]

What are the implications of an inaccurate COA?

COA budgets are a critical component of college affordability because they determine the amount of financial aid a student can receive. Students cannot receive any type of financial aid that exceeds their COA, and need-based financial aid is limited to the difference between COA and the recipient's Student Aid Index (SAI), the amount that they and their family are expected to contribute toward their education.[12] For example, if a student's stated COA is $30,000 and their SAI is $8,000, then that student cannot receive total aid that is greater than $30,000 or need-based aid that is greater than $22,000.[13]

> IF THE COA DOES NOT ACCURATELY REFLECT A STUDENT'S EXPENSES, THE AMOUNT OF AID THEY ARE ELIGIBLE TO RECEIVE WILL BE LESS THAN THEIR ACTUAL EXPENSES—REQUIRING THAT THEY COVER THE DIFFERENCE THROUGH SAVINGS, SUPPORT FROM FAMILY AND FRIENDS, WORK, PRIVATE BORROWING, OR REDUCING THEIR ENROLLMENT IN CLASSES.

If the COA does not accurately reflect a student's expenses, the amount of aid they are eligible to receive will be less than their actual expenses—requiring that they cover the difference through savings, support from family and friends, work, private borrowing, or reducing their enrollment in classes. Private lenders, which include credit card and payday loan companies, do not offer all of the consumer protections like fixed interest rates and forgiveness programs that come with federal loans, and can harm students financially. Research has also found that working more than about 15 hours per week can negatively impact academic success.[14] Other research has found that for some student groups, such as foster youth, a direct relationship exists between the number of hours worked and the likelihood of dropping out of school. [15]

This is problematic for all students and especially for low-income students who may not have the same access to intergenerational wealth (e.g., family members who can help them fill the affordability gap) as their wealthier peers. Additionally, it inordinately impacts special populations like students with experience in foster care and student parents who often face additional costs that are not reflected in their COAs. (For more on students that may be particularly impacted, please see the Special Populations section on page 13.)

Inaccurate COA budgets also impact the extent to which policymakers fund need-based financial aid programs. When COA budgets are lower than students' actual expenditures, they artificially deflate students' financial need—both individually and in aggregate. This paints an incomplete picture of the resources students need to afford a higher education degree, which affects higher education attainment rates. The inadequacy of the current availability of financial aid is illustrated by data that show that students from the lowest income backgrounds attending California public colleges and universities have to put up to 50 percent of their family income towards covering college costs after accessing available grant aid.[16] These shares of family income are based on colleges' stated COAs and would be even higher if students' actual costs are greater. Accurately capturing how much students must pay to attend and succeed supports ongoing advocacy efforts for robust need-based financial aid like Cal Grant Reform, which would provide grants to more low-income Californians and account for inflation in non-tuition college costs.[17]

COA numbers that overstate actual costs are typically less problematic, although some point to a risk that overstating the costs could deter students from enrolling or that students may take out unnecessary loans. There is also a risk that setting artificially high COA budgets could impact the distribution of funding from financial aid programs with capped allocations, such as the Middle Class Scholarship program, by increasing the amount of financial need among higher income students. With a fixed amount of available financial aid, this could—depending on program policy—shift limited dollars away from lower income students whose college enrollment and persistence depend on financial support.

Finally, even when accurate COA numbers do not impact how much aid a student receives, it is important that students understand how much it costs to attend an institution, so that they can plan accordingly, and are not blindsided and forced to make choices that impact their academic success or future financial stability.

LITERATURE REVIEW

To date, there is limited academic research on COA. However, the research that does exist highlights the complexity and challenges of developing accurate COA budgets. In particular, the research notes the widespread lack of clarity around how COA is calculated, exploring the absence of transparency and consistency in data sources and processes used to develop these calculations across institutions. Without an understanding of processes, expense details, and sources of data, there is an ongoing challenge to understand which expenses (or lack thereof) may drive inaccuracies between published COA and students' real-life budgets.

TO DATE, THERE IS LIMITED ACADEMIC RESEARCH ON COA. HOWEVER, THE RESEARCH THAT DOES EXIST HIGHLIGHTS THE COMPLEXITY AND CHALLENGES OF DEVELOPING ACCURATE COA BUDGETS.

Within this critique, it's noted that accurate COA budgets require access to diverse data sources and significant time to develop these budgets—resources that not all campuses have.[18] COA budgets tend to be developed by individual campus financial aid offices, often using average costs, annual percentage increases, and student survey data.[19] These data sources represent broad arrays of expenses and populations, and can easily result in student budgets that may differ substantially from actual costs of living. In limited

studies, researchers found that nearly half of colleges nationwide (including two- and four- year public and private institutions) have published COA budgets that deviate at least 20 percent from the area cost of living.[20]

NEARLY HALF OF COLLEGES NATIONWIDE (INCLUDING TWO- AND FOUR- YEAR PUBLIC AND PRIVATE INSTITUTIONS) HAVE PUBLISHED COA BUDGETS THAT DEVIATE AT LEAST 20 PERCENT FROM THE AREA COST OF LIVING.

While these deviations included both overestimating and underestimating, over a third of colleges nationwide underestimated COA expenses by more than $3,000.[21] Public four-year colleges and universities are more likely to overestimate than underestimate COA compared to regional cost of living. In addition, cost of living allowances for colleges with higher numbers of Pell Grant recipients had more variation (both over- and under-estimating) compared to actual costs and larger colleges had less variation. One analysis suggested that campuses serving lower income students may have fewer resources (including staff time) to calculate student budgets, resulting in more inaccuracies in COA figures.[22] The research also highlights that individualized campus processes and lack of transparency in data sources result in substantial differences in COA among campuses in the same geographic area.[23] One study found variation that exceeded $15,000 between two campuses within just a half mile of each other.[24]

The limited research demonstrates that COA figures are likely to be inaccurate when compared to the overall cost of living in the community surrounding a given college, and that these inaccuracies result from an overall lack of consistency and transparency in COA calculations. This can put students in a bind, requiring them to cover unexpected gaps in expenses, incur more loan debt than needed, or make difficult decisions about continuing their education.

The COA depends on multiple factors including the data used to calculate expenses, area cost of living, campus political motivations, and the type of educational institution.[25] However, the research demonstrates that little is known about how colleges calculate these figures, making it challenging to determine which costs and processes are influencing the variations. While researchers agree more consistency, accuracy, and oversight is needed, there is little agreement on what a more accurate process would look like.

SPECIAL POPULATIONS

While COA budgets affect every student, there are student populations with unique needs and circumstances that are more significantly impacted by inaccurate COA figures.

As California has moved toward expanding the amount of financial aid available, in particular to certain populations such as foster youth, student parents, and students experiencing homelessness, more students are finding that they are reaching their COA limit and are forced to turn away available financial aid while still struggling to make ends meet.

Students with Experience in Foster Care

Students who have been involved in the foster care system face many barriers to success in postsecondary education, with just 10 percent of these students achieving a two- or four- year degree by the age of 23 compared to 36 percent of all students.[26] Many students with experience in foster care cite concerns with paying for college and the need to work as major barriers to enrolling and succeeding in higher education.[27] These concerns are not unwarranted: More than half of students with experience in foster care (more than the general student population) live in more expensive off-campus housing arrangements and without family support to fall back on.[28] In California, full-time students with experience in foster care have an average unmet need of $15,200 compared to $8,100 for students who do not have foster care experience.[29] Students with foster care experience are often shouldering this unmet need on their own, and consequently are twice as likely as other students to experience homelessness.[30]

In recognition of foster youths' additional expenses and greater financial need, policymakers have funded college financial aid programs to support them, such as the federal Chafee Grant, the supplemental Cal Grant access award for living expenses, and expanded awards under the Middle Class Scholarship and Student Success Completion Grant programs.[31] Together with other grants and scholarships, these resources may cover some colleges' published costs of attendance. However, when colleges underestimate what it actually costs to attend, or a student has costs that are not accounted for in the COA, foster youth may be forced to decline available aid, leaving them to cover their remaining expenses by working, borrowing, or attending part time. Faced with financial need that is not officially captured, many foster youth choose to work full time and drop out of school or reduce their enrollment significantly, exacerbating equity gaps in college enrollment and completion. This is particularly unfortunate given that financial aid may be available to cover these expenses that foster youth cannot avail themselves of due to COA limitations.

Students with Dependents

Despite tending to earn higher GPAs than their non-parenting peers, students who are parents are less likely to complete college than students without children, and higher expenses and financial need are two major factors.[32] Students who are parents, many of whom are low-income, face a number of expenses that are often not reflected in college COA budgets, including childcare, family healthcare, child education costs, and vehicle related expenses. Day-to-day expenses like food, housing, and utilities are also greater for students with families.[33] These expenses add up substantially; one analysis found that California students with dependents need an average of $7,600 more per child in childcare and food costs; and, nationally, student parents face average unaccounted costs of $10,900 compared to published COA figures.[34,35]

To help cover these expenses, in addition to financial aid programs available to all low-income students, California student parents can receive up to $6,000 from the Cal Grant for Students With Dependent Children, but only if they have remaining financial need. Like other special populations with additional needs and expenses, they may not be able to access available financial aid if they have already received funding to cover their set COA. A bill recently signed into law by Governor Newsom, AB 2458, will soon require public higher education systems to provide colleges with policy guidance that is based on specified data sources to develop COA budgets that reflect student parents' actual costs, which should help ensure they are able to access all of the financial aid for which they're eligible.[36] Additionally, given the demands of parenthood and education, many student parents choose to attend college part time, reducing their access to available financial aid—despite incurring some costs that remain the same regardless of enrollment status—and increasing the length of time (and cost) to finish their degree. In fact, 83 percent of California student parents enroll part time or for part of the year compared to 63 percent of their non-parenting peers.[39]

Students Experiencing Housing Instability

In a state as expensive as California, it's no surprise that many students struggle with finding affordable housing. In a recent CSAC survey, 65 percent of community college students, 52 percent of CSU students, and 27 percent of UC students reported being housing insecure.[38] The overwhelming stress of housing insecurity can cause students not to meet satisfactory academic progress standards or reduce their enrollment status in order to work, jeopardizing the financial aid that supports living expenses.[38]

In 2019-20, California funded rapid rehousing (RRH) programs across all three public higher education systems to assist students in securing stable housing.[40] RRH programs offer case management, move-in assistance, and rental subsidies, helping students to stabilize their living arrangement so they can focus on their academics. Some colleges count these significant rental subsidies towards a student's financial aid package, making it more likely that these students will reach their financial aid limit and have to decline additional aid that exceeds the COA. If the COA is set too low, these vulnerable students may be declining thousands of dollars in financial aid that would support their ongoing basic needs and prevent future housing insecurity, impacting both their and the state's economic prosperity.

METHODOLOGY

In order to assess the accuracy of the COA budgets used by public colleges and universities in California, JBAY developed a methodology using publicly available data sources to estimate actual non-tuition costs, including variations by location, that were then compared to publicly posted COA budgets. The cost comparisons were limited to the living arrangement of students living off-campus independently given that on-campus housing and food costs are more straightforward and there is minimal information on what students living with family must pay.

Non-tuition COA budgets for off-campus students attending California Community College (CCC), California State University (CSU), and University of California (UC) campuses were identified for AY 2023-24 through a review of campus websites. In total, 134 campuses were included in the comparison: 103 CCCs, 22 CSUs, and nine UCs. Twelve community colleges were excluded from comparisons because COA figures were not available or incomplete on campus websites, and CSU Maritime, UC Law San Francisco (formerly UC Hastings), and UC San Francisco were excluded due to their specialized academic programming.

For comparisons of average COA budgets across regions and higher education systems, this report calculated weighted averages using fall 2023 enrollment data from the California Community Colleges Chancellor's Office Data Mart, California State University Chancellor's Office Data Dashboards, and the University of California Office of the President Information Center.[41]

Author-derived expenses for comparison with published costs of attendance were determined using publicly available data sources that reflect California regional spending patterns and costs, including expenses reported by the U.S. Bureau of Labor Statistics Consumer Expenditure Survey and rents published by the U.S. Department of Housing and Urban Development. Expenses obtained from the 2021/2022 Consumer Expenditure Survey, including food, utilities, transportation (car expenses), and personal expenses, as well as county internet expenses obtained from 2020 Broadband Now, were adjusted using the annual 2023 California Consumer Price Index. Comparison budgets represent nine months of student expenses and assume a housing arrangement where rent for a two-bedroom apartment and utilities are split between two students. Transportation was assumed to be the median of public transportation expenses and the costs associated with driving a car to campus. A complete list of the data sources used, including rationale for methodological choices made, is included in the Appendix.

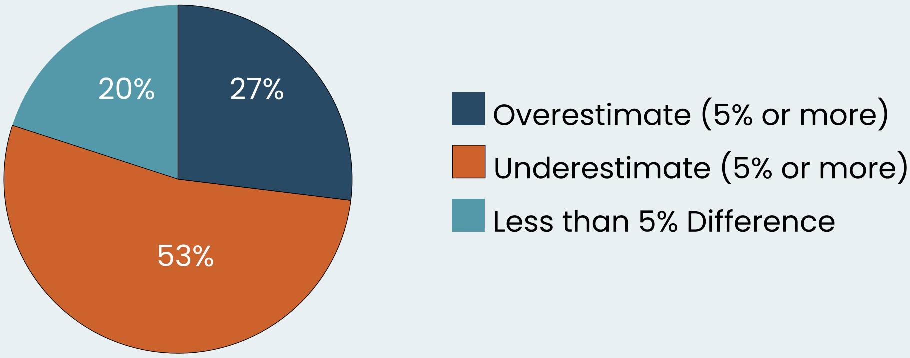
In order to better understand how both COA budgets are determined and how COA adjustments are handled, the report authors interviewed financial aid administrators and foster youth program staff from eight public colleges and universities across the state and the three California public higher education systems. Foster youth program staff were included given the disproportionate impact of COA limitations on these students (see Special Populations section on page 13.)

FINDINGS

1 Over half of colleges use COA budgets that are lower than estimated regional costs.

Comparing non-tuition COA amounts published by colleges with the methodology used in this report to estimate real costs revealed substantial inconsistencies. Across all public higher education systems in California, only eight institutions used COA amounts that were within $500 of this report's estimates and one in five colleges differed by 20 percent or more. More than half of California colleges and universities underestimated their COA budget by five percent or more, with some underestimating by more than $10,000. The median difference among those colleges that underestimated COA was about $4,090. Twenty-seven percent of institutions overestimated COA by at least five percent with a median difference of about $3,360 and 20 percent of colleges came within five percent of this analysis's COA estimates (Figure 1).

Figure 1
Comparison of Published COA to Report Methodology Across All Institutions



While underestimation occurred across all three systems (Figures 2-4), this trend was more pronounced among the CSU and UC systems, where 77 percent and 100 percent of campuses, respectively, underestimated costs by at least five percent. The difference between published COA budgets and this report's estimates among colleges that underestimated was greatest for the UC system, with an average enrollment-weighted difference of about $9,550 compared to $5,220 for CSUs that underestimated college costs. This is likely driven in part by the spending patterns of younger students who tend to report lower expenses; at UC, 84 percent of students are no older than age 21 compared to 57 percent at CSU and 50 percent at CCC.[42] The CCCs underestimated costs at 44 percent of colleges, with an enrollment-weighted average difference of about $4,210 (Figure 5).

FIgure 2
Comparison of Published COA to Report Methodology Across California Community Colleges

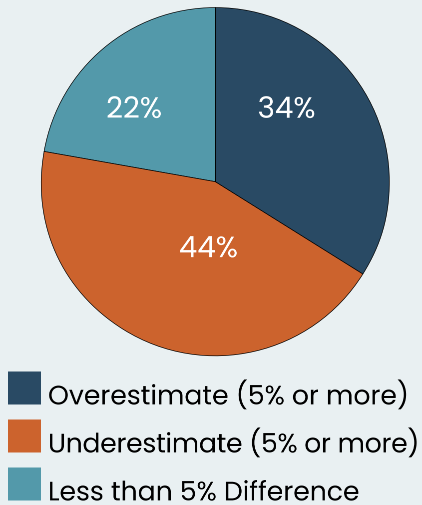


FIgure 3
Comparison of Published COA to Report Methodology Across Califronia State Universities

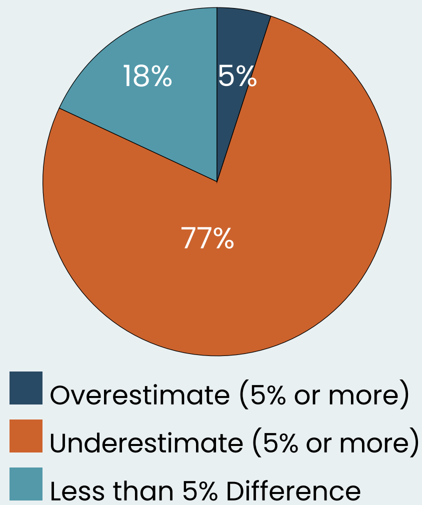
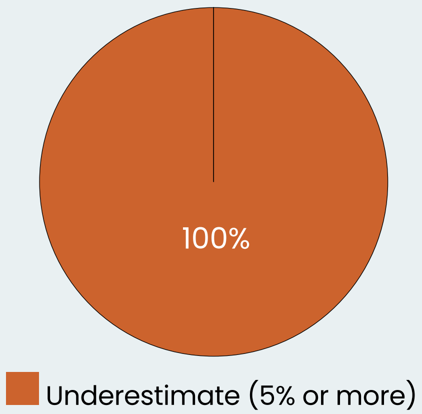


FIgure 4
Comparison of Published COA to Report Methodology Across University of California



Charts represent comparisons between AY 2023-24 COA published on campus websites and COA estimated by report methodology. Overestimating and underestimating are defined as having a published COA that is at least five percent different (greater or less) than the COA determined by report methodology. COAs with differences under five percent were assumed to be equal to report methodology.

Figure 5
Average Enrollment-Weighted Differences in COA for Colleges that Underestimated Costs, by Higher Education System

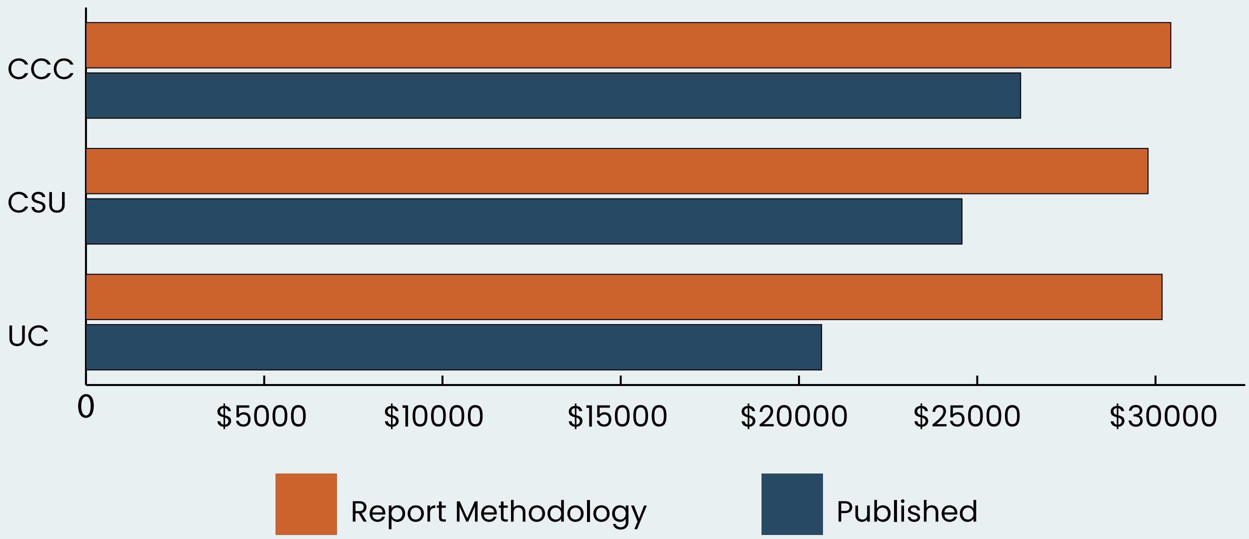


Chart illustrates average differences between colleges' published COA budgets and this report's calculated AY 2023-24 COA budgets for colleges statewide that underestimated student expenses, by public higher education system. System averages are weighted by their respective colleges' fall 2023 enrollment.

Colleges in the San Francisco Bay Area, the Central Coast, Los Angeles, and Orange and San Diego counties—where living costs are known to be high—tended to underestimate costs. Across all colleges in these regions, the enrollment-weighted average differences between COAs calculated by this report's methodology and colleges' published COAs were more than $3,000. Colleges in the Inland Empire and Northern California tended to underestimate COA, but by a much smaller amount, likely due to lower costs of living. In the Central Valley colleges tended to slightly overestimate costs, with enrollment-weighted average differences between published COAs and those produced by this report's methodology about $1,000. Statewide, the average difference between COAs calculated by this report's methodology and colleges' COAs was about $1,530 (Figure 6).[43]

Figure 6

Average Enrollment-Weighted Differences in COA, by Geographic Region

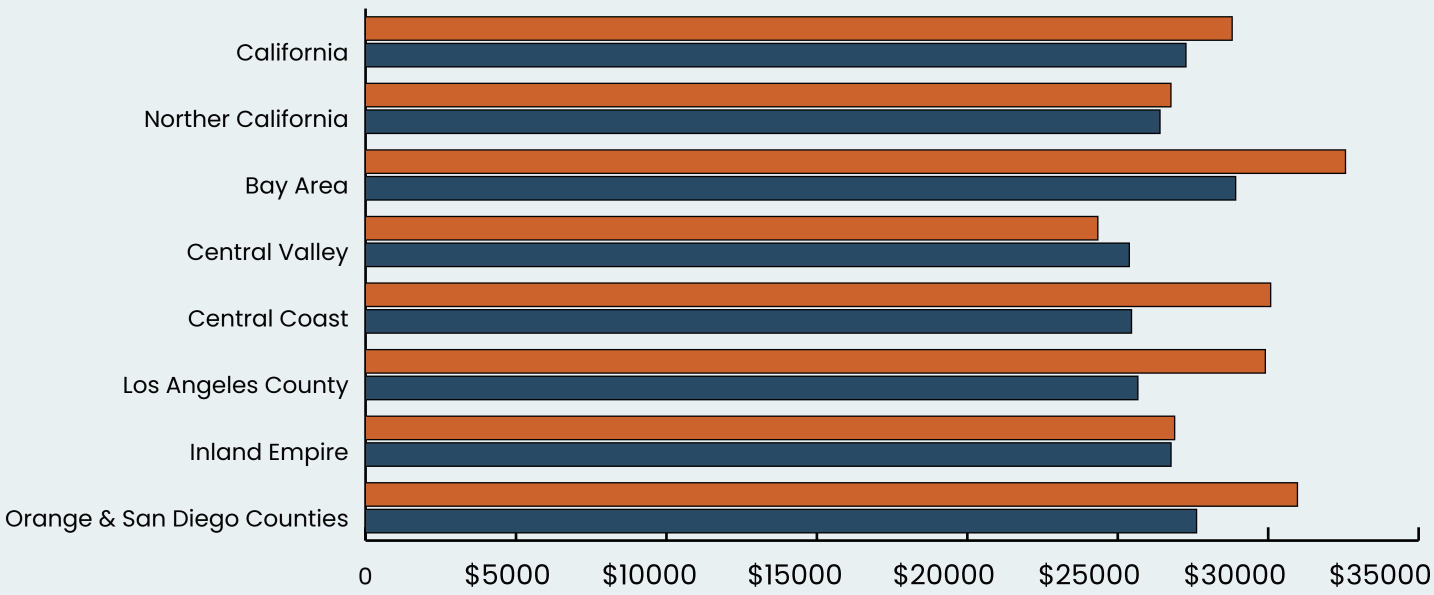


Chart illustrates average differences between colleges' published COA budgets and this report's calculated AY 2023-24 COA budgets, by geographic region and inclusive of all three public higher education systems. Averages are weighted by colleges' fall 2023 enrollment.

Among colleges that overestimated costs, the minimum difference between published COA and this report's methodology was $1,400, and for colleges that underestimated, the minimum difference was around $1,560. The maximum overestimate was about $9,280, and the maximum underestimate was notably greater at $14,950 (Figure 7).

Figure 7

Range in Absolute Dollar Amount Differences Between Published COAs and COAs Determined by Report Methodology (All Systems Combined, Statewide)

	Minimum Difference	Maximum Difference	Median Difference
Among All Colleges	$50	$14,950	$3,350
Among Colleges That Overestimated COA	$1,400	$9,280	$3,360
Among Colleges That Underestimated COA	$1,560	$14,950	$4,100

Table illustrates the range of absolute differences between AY 2023-24 COAs published on campus websites and the COAs estimated by report methodology. Overestimating and underestimating are defined as having a published COA that is at least five percent different (greater or less) than the COA determined by report methodology. Figures have been rounded to the nearest $10. Differences are inclusive of all three public higher education systems across all California regions.

One-quarter of campuses with publicly available COA budgets relied solely on CSAC's Student Expense Budget (SEB) for living off campus—which is developed from annually adjusted SEARS survey data—for the non-tuition elements of their COA budgets, with some campuses appearing to use CSAC budget data that were several years out of date. An additional 34 percent used at least one element from a CSAC SEB.[44]

While the CSAC-derived budgets are helpful starting points for colleges, they do not appear to accurately reflect regional costs. By averaging costs across California, the SEB may be higher or lower than actual costs in a given region as illustrated in Figure 8, which compares SEB cost categories with enrollment-weighted average regional costs derived from author calculations.

The comparisons in Figure 8 demonstrate a wide range of differences depending on the region. For the high-cost San Francisco Bay Area, use of the SEB underestimated average regional costs by about $6,000. In the Central Valley, where cost of living is lower, use of the SEB overestimated student expenses by more than $2,200. Statewide, use of the SEB underestimates student expenses by about $2,800. It is worth noting that the AY 2024-25 SEB for students living independently off campus has been adjusted to address previous figures that had gotten out of step with inflation, jumping to $30,078 from $26,561 for non-tuition college costs, a 13 percent increase.[45]

Figure 8

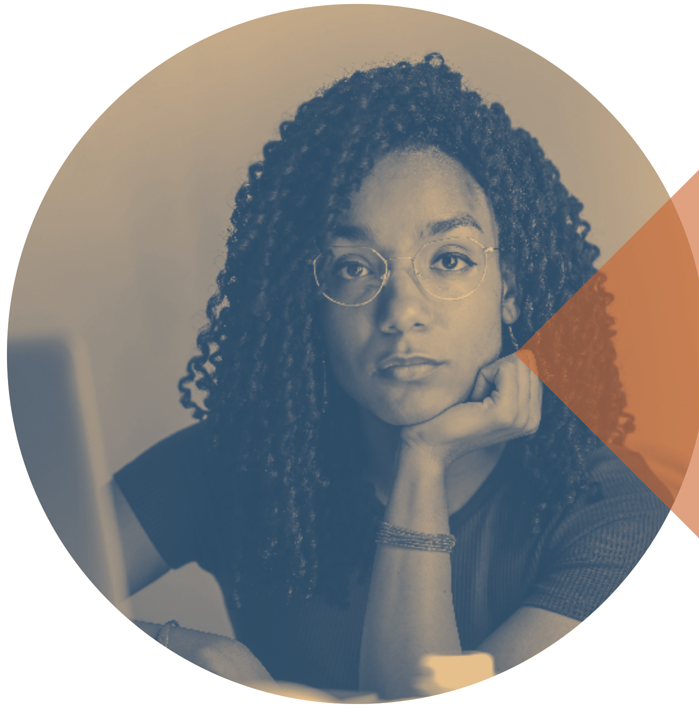
AY 2023-24 CSAC Off-Campus Student Expense Budget Compared to Average Enrollment-Weighted Regional Non-Tuition COA

	Food & Housing	Books & Supplies	Transpor-tation	Personal/ Misc.	Total	Difference From Student Expense Budget
AY 2023-24 CSAC Student Expense Budget	**$19,431**	**$938**	**$1,764**	**$4,428**	**$26,561**	**N/A**
California	$22,145	$1,400	$2,574	$3,289	$29,408	**-$2,847**
Northern California	$19,488	$1,391	$2,600	$3,289	$26,768	**-$207**
San Francisco Bay Area	$25,186	$1,412	$2,677	$3,289	$32,564	**–$6,003**
Central Valley	$17,203	$1,416	$2,432	$3,289	$24,340	**$2,221**
Central Coast	$22,918	$1,387	$2,484	$3,289	$30,078	**-$3,517**
Los Angeles County	$22,626	$1,394	$2,593	$3,289	$29,902	**-$3,341**
Inland Empire	$19,714	$1,420	$2,468	$3,289	$26,891	**-$330**
Orange & San Diego Counties	$23,690	$1,393	$2,596	$3,289	$30,968	**-$4,407**

Table represents average COA expenses by region, as estimated by this report's methodology. Averages are weighted by colleges' fall 2023 enrollment data.

While the SEB can be a resource for colleges that do not have the capacity to create their own COA budgets, reliance on them may leave many students, particularly the most vulnerable and least resourced, confined to budgets that may not meet their basic needs. In fact, data from CSAC's Food and Housing Survey, a supplement to its SEARS survey, found that 66 percent of students applying for financial aid in AY 2022-23 were food insecure and 53 percent were housing insecure, up from 39 and 36 percent, respectively, in AY 2018-19.[46]

2 There is no universal methodology for calculating non-tuition costs, leading to large inconsistencies across institutions.



While some very broad direction is given through the National Association of Student Financial Aid Administrators (NASFAA), the task of calculating COA is largely left to the individual institutions, with the exception in California of the UC system, which utilizes a standardized methodology for all campuses. Institutional financial aid offices choose which expenses are included in their COA components and which data sources they utilize to calculate those expenses. For example, while one institution may include utilities and a rental deposit in housing expenses, another may budget only for rent itself. Depending on what factors are taken into consideration, the resulting COA budget can present an inaccurate picture of what a student may actually need to pay to attend that particular institution.

Interviews with financial aid administrators reinforced the variation in how colleges calculate COA components. While some colleges use CSAC's annual Student Expense Budgets to set their COA, one financial aid administrator shared that his college uses them as a floor, and also utilizes other sources to augment categories that require region-specific information. For example, his office uses data from RentCafe.com to calculate average rent in the area surrounding his college, an approach echoed by other campuses including one CSU that uses Apartments.com to gather 60 local listings, discard 15 of the lowest and highest figures, and take the average of the remaining 45 rental costs. Another CSU, which serves a smaller community and has the capacity to do so, contacts individual apartment complexes in its immediate area to get a sense of what students are actually paying for one- and two-bedroom apartments, and bases housing costs on that information.

Variations are also highlighted by the inconsistencies across colleges located within the same geographic area, where costs like housing, food, and transportation should be comparable. In order to create intra-regional comparisons, the report's authors grouped public higher education institutions into 46 regions throughout California. In 10 of these regions, the difference between non-tuition COA expenses for local colleges differed by more than $5,000. In two of these regions, the difference was more than $10,000.

Comparison of Published AY 2023-24 Non-Tuition Off-Campus COA Budgets Within Similar Geographic Areas[47]

$8,062 maximum difference in COA

Berkeley City College	$31,416
California State, East Bay University	$29,231
UC Berkeley	$23,354

$17,162 maximum difference in COA

Monterey Peninsula College	$38,828
California State University, Monterey Bay	$28,718
UC Santa Cruz	$21,666

$14,424 maximum difference in COA

Riverside City College	$35,124
California State University, San Bernardino	$24,116
UC Riverside	$20,700

> WITHOUT KNOWING THE DETAILS OF HOW CAMPUS COA BUDGETS ARE CONSTRUCTED, MANY STUDENTS COULD FACE UNEXPECTED EXPENSES THROUGHOUT THE SCHOOL YEAR WITHOUT THE MEANS TO COVER THEM AND WITHOUT THE INFORMATION TO DETERMINE IF ASKING FOR AN ADJUSTMENT IS WARRANTED.

3 Colleges do not typically make information about how COA figures are calculated accessible.

A review of campus websites found a notable lack of transparency regarding how student budgets are calculated. In almost all cases, colleges publish COA budgets for broad categories like "transportation" and "personal expenses" without detailing the exact expenses and assumptions used to build these budgets. Some colleges rely on a net price calculator tool rather than post COA budgets. These calculators not only make COA information more challenging for students and families to obtain, but further obscure expenses by lumping transportation, personal expenses, and miscellaneous items together in one "other expenses" line. The lack of transparency means that students are left in the dark as to whether, for example, budgeted transportation assumes the cost of driving a car to campus or using the local bus service. Similarly, it is largely unknown if off-campus housing costs allow for renting a single occupancy studio or are based on a different configuration such as a shared two-bedroom apartment. Without knowing the details of how campus COA budgets are constructed, many students could face unexpected expenses throughout the school year without the means to cover them and without the information to determine if asking for an adjustment is warranted.

4 At almost one-third of colleges, COA budgets have not kept pace with inflation.

An analysis of COA amounts over five years, extracted from federal Integrated Postsecondary Education Data System (IPEDS) data, was compared to expected cost increases based on the California Consumer Price Index (CCPI) to look at the extent to which public colleges and universities increased their COA budgets to account for inflation between AY 2017-18 and AY 2022-23, during which period California prices overall grew by 22 percent.[48] The analysis revealed that, for non-tuition costs overall, just under one-third of colleges' published expenses did not align with increasing costs.[49]

Percentage Change Between AY 2017-18 and AY 2022-23	Living Expenses (Food & Housing)	Books and Supplies	Other Expenses*	Total Non-Tuition Costs
Covers at least CCPI	88%	9%	37%	70%
Does not cover CCPI	12%	91%	63%	30%

**The U.S. Department of Education's Integrated Postsecondary Data System's "Other Expenses" category combines transportation and miscellaneous personal expenses.*

The analysis also found that the extent to which the different public segments adjusted their costs varied. Overall, the median growth in total in-state non-tuition college costs was 20 percent at the UC, 26 percent at the CSU, and 28 percent at the CCC.

When examining individual COA components across all public segments, change in price varied considerably. For example, as illustrated in the chart below, the change in the cost-of-living expenses ranged from a low of zero percent to a high of 172 percent, with a median of 34 percent; the California Consumer Price Index shows an increase of 22 percent between AY 2017-18 and AY 2022-23.

Percentage Change Between AY 2017-18 and AY 2022-23	Living Expenses	Books and Supplies	Other Expenses*	Total Non-Tuition Costs
CCPI	22%			
Minimum	0%	-53%	-18%	-3%
Maximum	172%	65%	111%	103%
Median	34%	-38%	15%	24%

**The U.S. Department of Education's Integrated Postsecondary Data System's "Other Expenses" category combines transportation and miscellaneous personal expenses.*

When examining changes in COA budget categories for individual segments, living expenses (e.g., housing and food) grew by a median 23 percent at UC, 29 percent at CSU, and 34 percent at CCC; other expenses, which include transportation and personal expenses, increased by a median 11 percent at UC, 46 percent at CSU, and 15 percent at CCC.

Books and supplies *declined* by a median of 38 percent at CSU and CCC but grew by five percent at UC. Given the greater reliance by the CSU and CCC systems on the CSAC Student Expense Budgets, the decline in budget amounts for books is not surprising. According to CSAC, students in AY 2021–22 reported spending about 19 percent less on textbooks and other educational supplies than in prior years.[50] The survey analysis theorizes that these costs may have decreased due to greater conscientiousness among faculty and students, more utilization of online and rental textbook options, and initiatives sponsored by California and the segments encouraging the adoption and use of Open Educational Resources (OER). It is also possible that students are forgoing the purchase of needed books and materials because of a lack of funds, artificially deflating the cost. In fact, 28 percent of survey respondents somewhat or strongly disagreed with the statement "I have enough resources to cover Books and Supplies."[51] While national trends

do point to an overall decrease in the cost of textbooks, the $938 included in the student expense budget is lower than national estimates, which for AY 2023-24 were $1,470 for students at public two-year colleges and $1,250 for those at public four-year universities.[52]

It is important to note that these calculations of changes in costs over time do not account for whether AY 2017-18 costs accurately reflected what students paid or whether institutions took that into account when adjusting prices annually (e.g., if a COA component had been too high in AY 2017-18 an institution may have adjusted it downwards in subsequent years, or a cost that was discovered to be too low may have been "right-sized"). Nonetheless, it is notable that the change in COA element amounts varied considerably across California's public colleges and universities, and at several institutions they did not keep pace with inflation.

5 Getting information about whether COA adjustments are allowed and the process for requesting such adjustments is difficult, and many institutions are likely out of compliance with recently enacted federal changes.

Research for this report included a website scan in spring 2024 of the COA budgets for California's approximately 150 public colleges and universities and the extent to which each provided information about COA adjustments. Information about COA adjustment policies was not located for nearly two-thirds of the institutions, and the accessibility and quality of the information provided for the remaining institutions varied.

Some schools linked directly to an appeals form from their COA web page whereas others simply referred to its availability in a footnote. Allowable expenses also varied, with some institutions providing a lengthy list of qualifying categories (e.g., rent, internet, car payments, and childcare, among others) while others were limited (e.g., the cost of a computer). Information about and encouragement to utilize COA adjustment appeals also varied, with at least one college including punitive and discouraging language on its request form that warned students, "If you purposely give false or misleading information on this worksheet, you may be fined, sentenced to jail, or both."

Given the lack of information on campus websites, it was impossible to assess the degree to which institutions accept requests for COA adjustments and even harder to assess whether such requests are typically approved. To the extent that information was available, the analysis found that institutions vary in the extent to which they promote and accept COA adjustments, and the processes students must go through to request one. While some are flexible and clearly communicate the steps students must take to file an appeal, others are restrictive—or may not even allow an appeal at all.

THE FAFSA SIMPLIFICATION ACT REQUIRES INSTITUTIONS TO SUPPORT STUDENTS' ACCESS TO COA ADJUSTMENTS, INCLUDING INFORMING STUDENTS ABOUT THEIR ABILITY TO REQUEST—AND THE SCHOOL'S PROCESS FOR EVALUATING—PROFESSIONAL JUDGMENT ADJUSTMENTS FOR SPECIAL AND UNUSUAL CIRCUMSTANCES.

The FAFSA Simplification Act requires institutions, beginning in AY 2023-24, to implement several changes that support students' access to COA adjustments. This includes informing students about their ability to request—and the school's process for evaluating—professional judgment adjustments for special and unusual circumstances.[53] Moreover, institutions can no longer issue blanket denials of specific professional judgment requests nor impose deadlines for submitting requests. The approximately two-thirds of colleges where COA adjustment information was not found on the college's website are likely out of compliance with the requirement that this information be publicly available, and it is unclear whether these colleges' policies are otherwise in compliance with the new requirements.

6 There is a wide variation in financial aid administrators' attitudes about COA budgets and willingness to think creatively about COA adjustments.

Financial aid administrators and foster youth program coordinators from California's three public higher education segments were interviewed for this report to provide critical insight into campus financial aid practices and policies and their impact on students who are among those most affected by inaccurate COA budgets. Foster youth program coordinators were included, as these programs consistently report challenges with students who are unable to accept additional aid to cover unaccounted for expenses because the student has hit their COA ceiling and correspondingly their financial aid cap.

Administrators shared similar COA adjustment processes that involve students submitting a form and documentation that supports their need for a budget increase, but exactly what students must provide and the time it takes to process the information can vary. While staff reported that most requests with sufficient documentation are approved, processing times ranged from the same day to several weeks, which can impact students' ability to stay enrolled and/or have their basic needs met. Federal statute now allows financial aid administrators to accept a documented interview with the student requesting the adjustment, which cuts down on time and complexity in verifying students' circumstances, but not all financial aid offices employ this practice.[54]

Attitudes about what COA budgets should cover and whether they adequately reflect students' actual expenses vary, with one financial aid administrator stating, "this a ramen COA and not an every-day-steak COA." In contrast, another shared, "We know unexpected expenses happen and there are things we can do to help." While some students could benefit from budgeting advice, foster youth program coordinators believe students clearly demonstrate financial need and would undoubtedly benefit from increased flexibility in COA budget adjustments. One CSU foster youth program coordinator shared that hitting COA ceilings is a common experience for the students with whom she works—including first-generation Educational Opportunity Program (EOP) participants—that forces them to turn away available scholarships. The coordinator noted that every year the university loses students, impacting its retention rate, because of the region's high cost of living and students' inability to access additional scholarship opportunities due to the COA ceiling. Another foster youth program coordinator shared an example of being severely limited in the amount of financial support they could provide a student facing housing insecurity because the student had reached their COA cap.

Importantly, while the FAFSA Simplification Act prohibits colleges from categorically denying COA adjustment requests, aid administrators differ in the extent to which they are comfortable granting them and their openness to identifying creative solutions.[55] While one aid administrator interviewed for this report shared that she works directly with students to add any additional college-related expenses to their budgets and ensure they are able to receive all of the financial aid for which they are eligible, this is not universally the case.

> FINANCIAL AID OFFICE CULTURE AND WILLINGNESS TO COLLABORATE WITH FOSTER YOUTH PROGRAM COORDINATORS PLAY A KEY ROLE IN FACILITATING UNDER-RESOURCED STUDENTS' ACCESS TO THE FINANCIAL ASSISTANCE THEY NEED TO BE SUCCESSFUL COLLEGE STUDENTS.

COA adjustment approaches notwithstanding, some interviewees did express a willingness to reevaluate their calculations when they receive information indicating their estimates are inaccurate. After processing several COA adjustment requests and conducting research that revealed her institution's COA budget for students living at home was much more spartan than those at other CSU and UC campuses, one financial aid director pivoted from using campus data on a limited number of students to CSAC's more generous statewide student expense budget for dependent students residing at home.[56]

Financial aid office culture and willingness to collaborate with foster youth program coordinators play a key role in facilitating under-resourced students' access to the financial assistance they need to be successful college students. Positive examples exist, however, interviewees noted that the extent to which COA adjustment requests are approved depends on the attitudes of the financial aid office staff. One foster youth program coordinator shared being able to submit COA adjustment requests on behalf of students and obtain approval within one day. At one community college, a strong and long-standing relationship between the financial aid office and foster youth program coordinator means the two are in constant communication, and the foster youth program coordinator can get information about students' financial aid files and what is needed to make an adjustment within minutes. At another CSU, the financial aid director has invited the foster youth program coordinator to join the hiring committee for an associate director of financial aid; and at another CSU, the financial aid director works with campus partners, including a liaison located in the financial aid office, to spread the word to students that they may be able to increase their budgets. The latter also includes information in students' financial aid award letters, and sends students an email at the time of college orientation about the financial aid office's ability to exercise professional judgment and make COA adjustments.

STUDENT EXPERIENCES WITH COA

AMANDA'S STORY *Amanda is a single mother of three, a cancer survivor, and a student who experienced foster care, homelessness, and incarceration. Despite these immense challenges, she persisted in pursuing her education and enrolled in a four-year public university in California. Due to the college's COA limits, Amanda often could not access the full amount of scholarships she had earned—funds that could have been life-changing for her and her family.*

One particularly difficult moment came in her final quarter of college. Amanda moved to an off-campus apartment, expecting to receive assistance from a program that would cover most of her rent. Unfortunately, after she had already moved in, her application to the program was denied, leaving her responsible for the full rent with no safety net. The college's foster youth support program stepped in to provide financial assistance, but the COA cap severely limited the amount of support the program could offer. Despite efforts and advocacy—through budget adjustments and reallocating aid—the foster youth support program could only assist with one month's rent.

MARK'S STORY *Mark is a former foster youth who attended a four-year public university in California where he excelled academically, receiving numerous awards and accolades. His achievements were driven by a determined goal: to graduate without incurring any debt. Mark applied for every scholarship opportunity available and his exceptional academic performance and community involvement often earned him these awards. Mark quickly reached his COA limit, which meant that many of the scholarships he rightfully earned had to be returned due to budget limitations.*

Despite receiving the maximum financial aid available to him, Mark still struggled to meet his basic needs. To make ends meet, he had to take on side jobs, often pulling him away from his studies and forcing him to sacrifice academic opportunities. Despite his best efforts to avoid debt, Mark had no choice but to take out loans to stay on track with his demanding academic schedule and responsibilities.

KRYSTLE'S STORY *Krystle is a parent of four children and attended a four-year public university in California. Every year, she would hit her COA ceiling and need to request an adjustment. The process was not transparent and often tedious, requiring considerable emotional energy to initiate, and she would often delay it until additional financial assistance became absolutely necessary. Krystle faced numerous hurdles, including rejected receipts, demands for additional documentation to prove financial need, and even discouragement from an administrator - an issue only resolved by escalating to a supervisor.*

Despite meticulously listing all expenses, including over-the-counter medications and orthodontic treatments for her children, as well as making a case for cost of living adjustments in her high-cost California area, Krystle would only receive a fraction of her requested adjustment. This was particularly frustrating given that she was offered several thousand dollars in additional funding from other resources for child care stipends and housing payment assistance on campus, some of which she had to turn down. To make ends meet, at times she would work as a Certified Nurse Assistant outside of school, often taking on 16-hour shifts to maximize her earnings.

RECOMMENDATIONS: INSTITUTIONAL POLICIES & PRACTICES

1 Colleges should be transparent about expenses included in COA budgets and utilize multiple sources to calculate them, erring toward higher numbers where there is variation.

Providing realistic and transparent cost of attendance budgets is critical to ensuring students have enough financial resources to support their educational and basic needs. More accurate COA budgets also ensure that already-burdened college financial aid office staff are less likely to have to field numerous adjustment requests for routine expenses like housing and transportation.

In order to support more accessible budgets colleges should provide the basis for the amounts included in each category within their COA budgets. If an institution is relying on an external source such as the CSAC Student Expense Budget, this should be noted along with whether any adjustments were applied. Institutions that develop their own regionally customized budgets should specify the assumptions made, for example whether housing costs are for a shared two-bedroom apartment or a single occupancy studio, and should include all relevant utilities, including internet expenses.

Transportation costs present a particular challenge when developing COA budgets. Transportation needs vary by region, campus, and student, and there are significant cost differences between public transportation and commuting by car; according to this report's methodology, the cost of driving a car to campus is, on average, seven times more expensive than using public transportation. Statewide, nearly 63 percent of students report driving as their usual method of commuting to campus and about 16 percent report using public transportation.[57] Given this, colleges should factor the cost of driving a car to campus into estimated transportation expenses. A good rule of thumb is to take the median between public transportation and driving expenses to account for variation in how students commute to campus. However, this also means that colleges should allow for upward adjustments to individual COA budgets for students who solely rely on a car.

Using singular data sources—for example, relying only on statewide SEARS-based Student Expense Budgets—may not allow COA figures to reflect regional costs of living or the nuances of a college's given student population. As such, colleges should review and utilize multiple data sources to calculate expenses and err toward higher costs when there are differences among data sets. In general, expenses like housing, food, and transportation should be similar at colleges within the same geographic region. Colleges should cross reference their COA figures with other higher education institutions in their community, and adjust their figures if their budgets are notably lower than neighboring institutions. When crafting their own COA budgets, colleges should include relevant links to data sources used and direct links to their COA adjustment policy and process. This report's appendix offers suggested data sources for each expense category.

2 Colleges should broadly define the allowable bases for making COA adjustments.

Colleges should establish broad criteria for making adjustments to the Cost of Attendance (COA) and avoid setting rigid restrictions on the acceptable circumstances for these adjustments.[58] Colleges should allow, at a minimum, adjustments to the budgeted cost of any allowable expense, including housing, food, transportation, books and supplies, and personal expenses, to reflect a student's actual cost. For example, adjustments should be made when a student's rent or utilities exceeds the standard allowance. Adjustments should also be made for expenses such as purchasing a computer; medical, dental, or optical expenses; costs incurred by students with disabilities that enable their learning and well-being; and the cost of childcare expenses for students with dependents.

3 Colleges should clearly advertise their policy for making COA adjustments on their website and in financial aid award letters.

As required by the FAFSA Simplification Act, institutions should plainly present their policy for students to request COA adjustments in financial aid award letters as well as highly visible spaces, including on the financial aid web page and any other pages on the college website that mention attendance costs. Language should be accessible, transparent, and encouraging, and should delineate the steps necessary to complete the appeals process. The information provided should also include the contact information for staff who can help students navigate the steps necessary to request an appeal and information about any additional verification that may be requested. Institutional policies should default to relying on documented interviews with students as adequate verification, especially when obtaining written documentation is not feasible or easily procured, as federal rules allow.

4 Colleges should confirm all COA policies and practices are in compliance with statutory requirements (particularly in light of recent federal changes).

The FAFSA Simplification Act required that higher education institutions across the country make changes related to professional judgment starting in AY 2023-24.[59] In addition to notifying students about the availability of COA adjustments and the process for requesting one, it added new examples of adequate documentation of special and unusual circumstances, such as a documented interview between a student and financial aid administrator, as well as examples of special circumstances that can be used to adjust COA that include, but are not limited to, additional family members enrolled in college and students or family members with severe disabilities. When reviewing COA policies to ensure that processes are easy to understand and navigate, institutions should also ensure that they are in compliance with all statutory requirements, including the FAFSA Simplification Act's provision that all higher education institutions develop policies and processes for reviewing professional judgment requests.[60]

RECOMMENDATIONS: STATE POLICIES

1 Create a required minimum methodology.

California should ensure that all college and university systems establish a consistent and clear methodology to develop campus COA budgets that reflect the needs of student populations. This methodology and process should include:

Transparency: Colleges should publish their methodology, including data sources used and assumptions made, alongside COA budgets on college websites. Additionally, COA budgets should clearly outline all expenses that are included within broad expense categories.

Data Due Diligence: Colleges should be required to consult multiple data sources to determine the most accurate costs. Whenever possible, regional data should be used to determine expenses.

Federal guidance requires that colleges include allowances for food and housing, transportation, books and supplies, and miscellaneous personal expenses in COA budgets. Within these broad categories, colleges should be required to include the following specific expenses to improve accuracy regarding students' true costs:

Books and Supplies

- Cost of all supplies required, textbooks, textbook rentals, online access codes, etc.

Food and Housing

- Housing costs for the immediate community where the campus is located.
- Definitions of housing types and arrangements used to determine housing costs. For example: use of two-bedroom apartments with rents split equally between two students or use of single-occupancy studio apartment.
- All relevant utilities (electricity, water, gas, trash service) as well internet service.
- Food expenses that include meals made at home and purchased in the community.

Miscellaneous Personal Expenses

- Cell phone expenses
- Personal care supplies and services
- Purchase of clothing/shoes
- Laundry services
- College-related extracurricular activities

Transportation

Given that many California students commute by car to campus and the regional differences in availability of public transportation, colleges should incorporate the cost of commuting by car into estimated transportation expenses.[61] This report's methodology uses the median between public transportation and driving a car to account for commuting differences across student populations, and recommends allowing for adjustments to COA budgets for students who have higher transportation expenses.

When including expenses related to driving a car to campus, budgets should incorporate the cost of gas, car insurance, ongoing vehicle maintenance, and campus parking fees.

2 Create a requirement to support students' access to COA adjustments.

While recent FAFSA Simplification provisions direct colleges to increase awareness about students' ability to request adjustments, which includes modifying data elements in COA budgets, and require that colleges consider students' requests for them, California can take steps to strengthen these efforts.[62] California should require that:

a. Institutions prominently display information about COA adjustments in transparent and understandable language on key web pages and in financial aid award letters, including:

- How to submit an adjustment request
- The timeline for financial aid office review and response to adjustment requests
- Contact information for staff who can help students navigate the entire adjustment request process

b. Institutional policies specify the types of adjustments that must, at a minimum, be considered. These should include adjusting the budgeted cost of any allowable expense to reflect a student's actual cost; for example, adjustments should be made when a student's rent or utilities exceed the standard allowance or if a student uses a car as their sole form of transportation. Adjustments should also be made for expenses such as purchasing a computer; medical, dental, or optical expenses; costs incurred by students with disabilities that enable their learning and well-being; and the cost of childcare expenses for students with dependents.

c. Colleges accept a documented conversation between a student and financial aid administrator about the student's need for a COA adjustment as sufficient documentation when obtaining written documentation is challenging or not feasible.

3 Adequately fund financial aid office administration.

Financial aid offices must be adequately funded to have the staff and capacity to conduct research and construct accurate COA budgets, as well as make COA adjustments in a timely manner for students who request them. Resources available for financial aid administration vary by campus and segment, and California should ensure sufficient funding is provided so that financial aid administrators can assist students in capturing their true college costs and accessing all of the financial aid for which they are eligible.

SPOTLIGHTS ON CSU, DOMINGUEZ HILLS AND GLENDALE COMMUNITY COLLEGE

CSU, Dominguez Hills (CSUDH) has established a Financial Aid and Affordability Task Force, composed of 14 administrators, faculty, and staff, and 14 students, to improve college affordability—including providing better information about COA to students and families.[63] CSUDH launched the Task Force following increases in tuition and non-tuition costs at the CSUs and simultaneous decreases in available state financial aid. Through listening sessions and student surveys, CSUDH found that the impact of the affordability gap is felt most strongly by students of color and students receiving Pell Grants, and that over 20 percent of their students would turn to credit cards if faced with unexpected expenses, increasing their overall debt.[64]

The Financial Aid and Affordability Task Force has developed seven core approaches to address college affordability and student debt, including two related to cost of attendance. First, the Task Force seeks to "understand the total cost of education," expanding campus conversations about college affordability to include non-tuition expenses in addition to tuition costs. The Task Force also aims to "develop more robust methods for establishing non-tuition costs" to capture these additional costs and explore how additional aid can reduce the total cost of attendance.

Glendale Community College (GCC) is an example of an institution that actively encourages students facing a variety of special circumstances to apply for a COA adjustment. Information is centrally posted on the Financial Aid Office's Resources & Policies webpage, and includes several examples of allowable expenses. These include the cost of rent and utilities that exceeds a student's housing budget; the cost of uninsured medical, dental, or optical expenses that exceeds a student's personal expense allowance; and the cost of childcare for students with dependents.[65]

Notably, GCC's previous financial aid director, whose tenure ended in June 2024, wrote a detailed Financial Aid Policy on Budget Adjustments several years ago when she discovered that financial aid office staff needed to be empowered to use their authority and subject matter expertise to process COA adjustments. The policy grants the college's financial aid administrators the authority to evaluate and approve COA adjustments, and also includes funding guardrails so that if any adjustment requests exceed stated limits, such as more than $1,000 per term for disability-related expenses or healthcare, the advisor must confer with financial aid leadership before making a determination. The financial aid director also noted that it is important that GCC students are clear about their rights to make these requests and the college's responsibility to consider all of them.

CONCLUSION

While COA is a complex issue, best practices exist that can be leveraged to maximize financial aid access for California students with limited resources. The comparisons conducted across institutions revealed a systemic underestimation of real cost, lack of consistency in how COA budgets are calculated, and a lack of transparency both in helping students to understand how COA figures are derived and how adjustments may be requested. Solutions exist, however, and can be implemented both through changes to institutional policies and via action by the state legislature.

Institutions can be more transparent by clearly posting information about how COA budgets are constructed and the circumstances under which adjustments can be requested. Institutions should also examine their methodologies for developing COA budgets, and compare against actual costs in the nearby community—in particular for living expenses such as food and housing—to ensure that these budgets accurately reflect local economic conditions. Institutions should also provide students with easy processes to request adjustments to their COA, and should offer policies that allow for such adjustments for a wide range of circumstances. Finally, in alignment with federal law, institutions should not impose onerous verification requirements when students make adjustment requests, and should rely on a documented interview between a student and financial aid administrator when written verification is not feasible or easily obtainable.

Policymakers can ensure better consistency across the state by ensuring financial aid offices have sufficient funding to carry out their responsibilities, and requiring public colleges and universities to utilize clear and consistent methodologies to develop COA budgets that capture all relevant costs and reflect the needs of their student populations. The state legislature could further require clear communication to students regarding institutional policies and set a common standard for students to request COA adjustments, similar to that which the state adopted in 2023 for Satisfactory Academic Progress appeals.[66]

Cost of attendance is an issue that historically has gone largely unexamined both in California and nationally. It is an issue, however, that is increasingly being raised by practitioners and California's public segments as an impediment to students' access to critically needed financial aid. Adopting the recommendations detailed in this report will enable California to move one step closer to ensuring that all students have an equitable opportunity to afford and successfully obtain their desired credential, and realize their life goals and aspirations.

APPENDIX:

Data Sources Used to Calculate Regionally Adjusted COA Budgets for This Analysis

Housing

The authors reviewed multiple data sources for housing, including HUD Fair Market Rents and rental trends from Zillow and Apartments.com. Median rents from HUD were selected as most likely to reflect accurate housing costs within California counties and because HUD data is easily accessible and transparent in how housing costs are determined.

Food, Utilities, & Personal Expenses

The Consumer Expenditure Survey is administered and reported by the U.S. Bureau of Labor Statistics (BLS) on the spending habits and income of U.S. households, and is one of the only publicly available tools to estimate costs of goods and services in the United States. The authors used data from the California table and expenses representing the second lowest (20th) percentile income to approximate spending by an average student.

Transportation

Given that transportation options vary greatly by student, region, and campus, the authors used the median cost between public transportation expenses and the cost of driving a personal vehicle to estimate transportation costs. The expense of driving to campus includes the cost of an academic year parking permit for each individual campus and BLS Consumer Expenditure Survey data was used to estimate spending for gas, vehicle maintenance, and insurance. The cost of monthly bus passes was sourced from county or metropolitan area transit agencies to estimate public transportation expenses.

Internet Expenses

The Broadband Now database was selected to provide county-level data on internet expenses.

Books & Supplies

The College Board's *Trends in College Pricing* report was utilized to estimate costs for books and supplies. While this report uses national data, it was the only data source found by the report's authors that provided estimates specifically for educational supplies.

COA Component	Data Source and Year	Data Points Included	Region	Adjusted for CPI	Assumptions & Notes
Rent (Included in Food & Housing)	US Department of Housing and Urban Development (2023-2024)	One half of median rent for a two-bedroom apartment.	California County	No	Rental expenses are assumed to be shared equally between two students.
Utilities (Included in Food & Housing)	BLS Consumer Expenditure Survey Data (2021-2022)	One half of expenses for natural gas, electricity, water, and other public services (e.g., trash collection, sewer maintenance, etc.)	California, by income level (2nd Lowest (20th) Percentile)	Yes	Utility expenses are assumed to be shared equally between two students.
Internet (Included in Food & Housing)	Broadband Now (2020)	One half of lowest cost monthly internet expenses.	California County	Yes	Internet expenses are assumed to be shared equally between two students
Food (Included in Food & Housing)	BLS Consumer Expenditure Survey Data (2021-2022)	Total food expenses, including groceries and meals purchased away from home.	California, by income level (2nd Lowest (20th) Percentile)	Yes	Food expenses are assumed to be per student.
Transportation	BLS Consumer Expenditure Survey Data (2021-2022)	Total expenses for gas & motor oil, vehicle insurance, and vehicle maintenance and repairs.	California, by income level (2nd Lowest (20th) Percentile)	Yes	Federal guidance does not allow for transportation expenses to include the cost of purchasing or leasing a vehicle.
Transportation	Campus websites (2024)	Campus parking fees for one academic year (two semesters or three quarters)	By college campus	No	For campuses that had temporarily suspended parking fees or if parking fees were already included in campus fees, parking expenses were assumed to be zero. Two campuses provided parking through daily permits only; parking expenses were calculated for daily parking for all instructional days in an academic year.
Transportation	Local Transit Websites (2024)	Public transportation expenses represent the cost of a monthly (or closest equivalent) bus pass obtained from local transit websites in May 2024. Transit costs reflect the cost of a bus pass for local, adult ridership (with no discounts) for a nine-month academic year.	By California county or metropolitan area	No	For larger metropolitan areas, only the major transit carrier was used to calculate public transit costs.

COA Component	Data Source and Year	Data Points Included	Region	Adjusted for CPI	Assumptions & Notes
Personal Expenses	BLS Consumer Expenditure Survey Data (2021-2022)	Total expenses for laundry and cleaning supplies, college-related extracurricular expenses (fees and admissions), personal care products and services, apparel (clothing and shoes), and cell phone services.	California, by income level (2nd Lowest (20th) Percentile)	Yes	Health insurance costs were not included in personal expenses with the assumption that most students would have health insurance through their parents, MediCal, or their higher education institution. However, students may incur ongoing healthcare costs depending on their circumstances; this report recommends COA adjustments for student healthcare costs.
Books & Supplies	College Board - Trends in College Pricing, page 11 (2023)	Includes the cost of hardcopy textbooks, online textbooks and codes, textbook rentals, and other supplies such as a personal computer.	National: College Board Annual Survey of Colleges data, National Center for Education Statistics, Student Watch and Student Monitor, and data from the federal Integrated Post-secondary Education Data System (IPEDS)	No	While there are indications that spending on textbooks and supplies have decreased, the authors used national estimates that are higher than CSAC's Student Expense Budget figures given that nearly 30% of California students reported not having enough money for books and supplies. [67, 68]

ENDNOTES

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43. Regions represent broad areas of California, inclusive of the following counties. Counties where there are no public colleges/universities or where college data was not available were not included in the analysis:
a. Northern California: Butte, El Dorado, Humboldt, Placer, Plumas, Siskiyou, Sacramento, Shasta, Sonoma, Yolo and Yuba.
b. San Francisco Bay Area: Alameda, Contra Costa, San Mateo, Napa, San Francisco, Santa Clara, Santa Cruz and Solano.
c. Central Valley: Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus and Tuolumne.
d. Central Coast: Monterey, San Luis Obispo, Santa Barbara and Ventura
e. Los Angeles: Los Angeles
f. Inland Empire: Imperial, Riverside and San Bernardino
g. Orange and San Diego: Orange and San Diego.

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