

Texas High School Counselors' Response to the Financial Aid Application Graduation Requirement





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Background

Requiring financial aid application completion for high school graduation is currently trending in education policy as a way to increase college enrollment and completion. In 2019, under House Bill 3 (HB 3), Texas became the second state to pass legislation requiring students to complete and submit a financial aid application for high school graduation. The HB 3 graduation requirement is part of Texas's broader efforts to increase the number of students who complete college and reduce students' college debt. State policies, such as the Texas HB 3, have the potential to greatly increase students' college access and persistence by improving their knowledge of the financial aid application process, their receipt of financial assistance, and their ability to pay for college (Aud et al., 2013; Bettinger et al., 2012; Chen et al., 2020; McKinney & Novak, 2015). By the end of the state legislative sessions in 2023, 12 states had established some form of universal Free Application for Federal Student Aid (FAFSA) policy.¹

Starting with the 2021–22 school year, the HB 3 financial aid application graduation requirement mandated students enrolled in Grade 12 in Texas public high schools to complete and submit a FAFSA or Texas Application for State Financial Aid (TASFA) application or sign an opt-out form.² ³ Although the financial aid application requirement is targeted at students, implementation of this requirement also necessitates system-level improvements at the school, district, and state levels. Specifically, implementing the HB 3 policy involves the development and coordination of resources and support from Texas public schools and school districts, the Texas Education Agency (TEA), the Texas Higher Education Coordinating Board (THECB), and regional education service centers (ESCs). In addition, district and school staff play important roles in ensuring that students meet the HB 3 financial aid graduation application requirement prior to graduation.

Project Overview

The American Institutes for Research® (AIR®) was awarded an Institute of Education Sciences (IES) research grant to examine implementation of the Texas graduation requirement and how implementation is related to student outcomes. To broadly understand how high schools and counselors are implementing the policy, the research team administered an online survey to address the following research questions:

- 1. How is the HB 3 financial aid application graduation requirement being implemented in high schools and school districts across Texas with regard to:
 - a. informing students and parents about the HB 3 financial aid application graduation requirement?
 - b. using and developing resources, including the toolkits developed by TEA to help students and parents complete financial aid applications?

https://www.ncan.org/news/648074/Four-More-States-Adopt-Universal-FAFSA-Total-Climbs-to-12.htm

The TASFA collects information to help determine eligibility for state (or institutional) financial aid programs administered by institutions of higher education in the state of Texas. Students classified as Texas residents who are not eligible to apply for federal financial aid, including undocumented students, using the FAFSA are encouraged to complete the TASFA. http://www.collegeforalltexans.com/index.cfm?objectid=699A998A-E7F3-1DCC-3F460F26136EEA05

³ A parent must sign an opt-out form or a student can sign the form if the student is 18 years of age or older. A school counselor can authorize the student to decline to complete the financial aid application and sign the opt-out form on behalf of the student for good cause, as determined by the school counselor.

- c. developing partnerships with nonprofit organizations or other service providers to assist parents and students with financial aid application completion?
- d. providing training to school staff regarding the HB 3 financial aid application graduation requirement?
- 2. How are counselors responding to the HB 3 financial aid application graduation requirement with regard to:
 - a. the training, time, support, and resources they have received to assist students and parents with financial aid application completion?
 - b. developing resources to support students and parents to complete financial aid applications?
 - c. talking to students and parents about financial aid application completion or the opt-out option?

The 15-item survey was administered via a unique hyperlink within an email sent to the district superintendent and directly to the counselor from May through December 2023 (see Appendix A for more information on the data and methods, and Appendix B for the counselor survey).

Findings

The following summarizes what we learned from Texas counselors as they implemented the second year (2022–23) of the financial aid application graduation requirement.⁴

Counselor Training on the Financial Aid Application Graduation Requirement

On the survey, counselors were asked to list any and all sources from whom they received training to help implement the financial aid application graduation requirement. As Exhibit 1 displays, 37% of counselors indicated receiving no training. Other counselors reported receiving training from regional ESCs (24%) and internal training from district- or school-level staff (22%). Counselors also reported using Texas OnCourse (21%), a free online resource that supports educators with college and career planning.

In addition, in an open-ended question, counselors were asked to describe other types of information or training that would help them implement the financial aid application graduation requirement. Thirty-four percent of the 213 counselors who responded to the question reported **needing more information and resources on FAFSA/TASFA**, including step-by-step

Exhibit 1. Training That Counselors Reported Receiving to Implement the Financial Aid Application Graduation Requirement



Note. N = 767. Counselors may select more than one response.

⁴ Because the response rate of the survey was less than 85%, a nonresponse rate bias analysis was conducted and weights were applied to all response rates. See Appendix A for more details.

guides for parents, handouts for parents, Spanish language resources, FAQ documents, training modules, and presentation slides. In terms of other supports, counselors reported needing more and better verification and tracking tools as well as regular updates as changes to deadlines, processes, and requirements come in and when successful strategies are identified.

Twenty-six percent of counselors responding to the open-ended questions reported **needing more comprehensive training on FAFSA and TASFA**, not just overviews (26%). This included how to walk families through getting the FSA ID and completing an application as well as how to troubleshoot common problems, such as helping students who have an error when creating their account or assisting students with extenuating family circumstances.

Communication and Providing Support to Students and Families

Counselors were asked how they **inform students and families** about the financial aid application graduation requirement. More than 80% of counselors reported holding parent meetings (Exhibit 2). Counselors also reported using email (71%), social media (59%), and the district webpage (48%) to inform students and families about the graduation requirement. Twenty-seven percent of counselors indicated that they used other ways than those listed in the exhibit to inform students and families about the graduation requirement. These other ways included senior meetings, classroom presentations, school assemblies, and emails and letters sent directly to parents.

Counselors were asked how their school currently supports students with **completing** the FAFSA and/or TASFA. More than 85% of counselors reported encouraging and reminding students and families to complete the FAFSA/TASFA, and meeting with students and parents individually (84%) (Exhibit 3). In addition, 74% of counselors reported monitoring FAFSA/TASFA completions through a data dashboard and holding weekend or evening sessions for families to receive assistance with submitting the FAFSA/TASFA (73%).

I would like to see created documents/videos to help students and families complete the FAFSA. I would like to receive training on the completion of the FAFSA and how families with no income or [who] do not want to report income complete the requirement. We use the opt-out form at this time. I would like to see [the] information/process for students that are not US residents. I assume they cannot access federal funds.

- Counselor

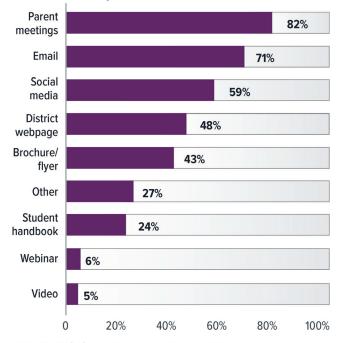


I need training in TASFA and would like formal training on FAFSA. I have learned on trial and error. To effectively implement the financial aid application graduation requirement, I would benefit from comprehensive training and information in areas such as financial aid programs and eligibility, application procedures, income and asset assessment, dependency status determination, need analysis and expected family contribution, special circumstances, financial aid policies and updates, communication and outreach, data security and privacy, and resource and support networks.

Counselor



Exhibit 2. Types of Communication That Counselors Reported Using to Inform Students and Parents About the Financial Aid Application Graduation Requirement



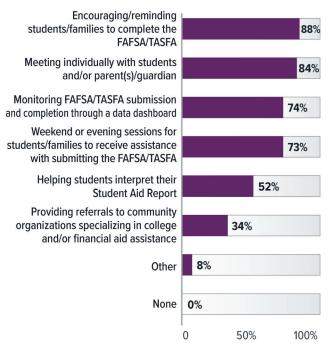
Note. N = 758. Counselors may select more than one response.

The survey also asked counselors about any external organizations their school partnered with to provide resources and support to help students and families complete a FAFSA or TASFA. More than half of counselors (52%) reported partnering with their local college or university (Exhibit 4). Seventeen percent of counselors reported partnering with TRIO/Upward Bound, a federally funded program that assists lowincome and individuals with disabilities in progressing from middle school through college. Seventeen percent of counselors also reported partnering with other external organizations, including community-based organizations, such as CaféCollege, LEARN Inc., inspirED or GO Centers, and foundations; Workforce Solution partners within the Texas Workforce Commission; city chambers of commerce; and online platforms, such as Going Merry.

As defined in the Texas Administrative Code, to graduate from public high school, students must complete either a FAFSA or TASFA, or sign a financial aid application **opt-out form**. A parent must sign an opt-out form or a student can sign the form if the student is 18 years of age or older. A school counselor can authorize the student to decline to complete the financial aid application and sign the opt-out form on behalf of the student for good cause, as determined by the school counselor.

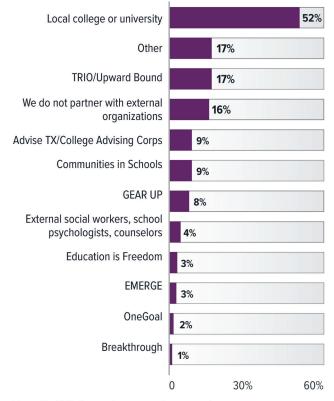
On the survey, we asked counselors about circumstances that have necessitated their signing an opt-out form on behalf of a student. Almost half of counselors (48%) reported signing an opt-out form because the student was not attending college (Exhibit 5). Counselors also reported signing an opt-out form because the student had not been able to obtain information from parents required to file a FAFSA (40%) or because parents simply refused to sign the opt-out form (33%). The top reasons cited by counselors for why a parent refused to sign the opt-out form include parents' fear of sharing their information,

Exhibit 3. Ways That Counselors Reported Supporting Students With Completing the FAFSA/TASFA



Note. N = 758. Counselors may select more than one response.

Exhibit 4. External Organizations That Counselors Partner With to Support Students and Parents With Completing a FAFSA/TASFA



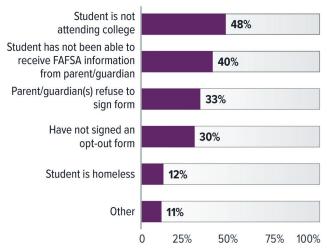
Note. N = 758. Counselors may select more than one response.

especially families with undocumented status; parents having misinformation about filling out an application and use of that information; and parents believing their income is too high to receive any aid.

Counselor Responsibilities

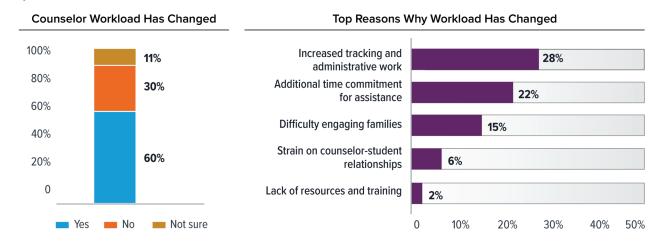
Counselors play a key role in tracking and helping students complete graduation requirements. On the survey, we asked counselors if their **workload had changed** due to this graduation requirement and if they felt they have adequate time to address parents' and students' needs in meeting this requirement. Sixty percent of counselors reported that their workload had changed, while 11% reported that they were not sure (Exhibit 6).

Exhibit 5. Circumstances That Have Necessitated the Counselor Signing an Opt-Out Form



Note. N = 758. Counselors may select more than one response.

Exhibit 6. Counselors' Perceptions of Whether Their Workload Had Changed Due to the Graduation Requirement



Note. *N* = 755. Of those who reported *Yes, their workload had changed*, 428 counselors provided additional detail about how their workload had changed. Responses could be coded into multiple categories.

Of the 428 counselors who reported how their workload had changed, the following top themes emerged:

- Increased tracking and administrative work (28%). Counselors have experienced an increase in administrative tasks due to the requirement to track and monitor FAFSA, TASFA, or opt-out form completions, adding significant time to their workload.
- Additional time commitment for assistance (22%). Counselors reported that the requirement had substantially increased the time they spend providing individual assistance to students and parents, often outside of regular school hours.

• **Difficulty engaging families (15%).** Counselors faced challenges engaging families in the financial aid process, with many students and parents showing reluctance or resistance to involvement. This reluctance

from families required additional follow-up and persuasion efforts by the counselor.

- Strain on counselor-student relationships (6%).
 Counselors reported that the requirement has strained the relationships they have with students and parents, who view the financial aid process as invasive and unnecessary.
- Lack of resources and training (2%). Counselors expressed a lack of resources and training to effectively support the financial aid application process, highlighting the need for more support from the district or external organizations.

Parents act as [if] it is my obligation to complete their FAFSA and do not provide the information needed to make an account and enter all information.

- Counselor



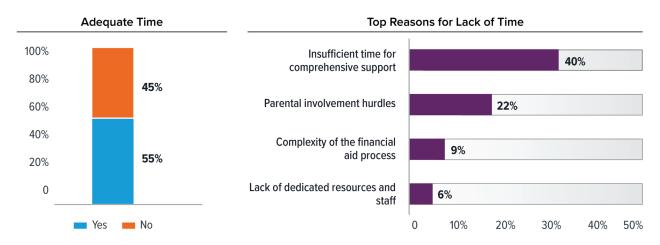
We have over 600 seniors and it's a lot of time out of my regular and already extensive workload. Many students have to be helped individually and we are not and should not have to be experts in the FAFSA process.

- Counselor



Although counselors' workloads changed due to the requirement, 55% of counselors reported that they felt they had adequate time to address parents' and students' needs regarding the requirement (Exhibit 7).

Exhibit 7. Counselors' Perceptions of Whether They Have Adequate Time to Support Students and Parents With Completing a FAFSA, TASFA, or Opt-Out Form



Note. N = 750. Of those who reported *No, they do not have adequate time*, 294 counselors provided additional detail about their lack of time. Responses could be coded into multiple categories.

Of the 294 counselors who reported reasons they did not have adequate time, the following top themes emerged:

• Insufficient time for comprehensive support (40%). Counselors overwhelmingly reported that there is not enough time to provide the comprehensive support needed for families to complete FAFSA, TASFA, or opt-out forms. The added responsibility of tracking completions further stretched their limited time.

- Parental involvement hurdles (22%). Counselors reported significant hurdles in involving parents in the
 - financial aid process, citing challenges such as parents' reluctance to share information, busy schedules, and limited availability for school meetings.
- Complexity of the financial aid process (9%).
 Counselors reported that the complexity of the financial aid process required them to spend considerable time with families, which was not always feasible given their extensive duties and large caseloads.
- Lack of dedicated resources and staff (6%).
 Counselors reported that they do not have the support they need to effectively assist all families.

I now have to track status of FAFSA completions, and track down students that have not completed it, sometimes have to sit down with individual students and go through the process with them to make sure it is completed.

Counselor



We need the local college & universities to attend not only on Regional night but also campus-initiated evenings and be available for daytime group activities, and student/parent-initiated consults.

- Counselor



Perceptions of the Financial Aid Application Graduation Requirement

As a first step in obtaining the financial assistance that many students need to enroll and persist in college, completing a financial aid application for graduation was intended to improve college enrollment and persistence in Texas. On the survey, counselors were asked how likely they felt the graduation requirement met its goal of increasing the number of students who enroll in college (Exhibit 8). About an equal percentage of counselors either thought the graduation requirement somewhat likely or very likely met its goal (35%), or somewhat unlikely or very unlikely met its goal (35%). Another 30% of counselors were neutral.

Counselors also were asked about whether they had received feedback from students or parents about the financial aid application graduation requirement (Exhibit 9). Similar percentages of counselors reported receiving no feedback from students (27%) or parents (28%). Of those who had received feedback, more counselors reported receiving positive feedback from students (61%) than parents (50%) and receiving more negative feedback from parents (50%) than students (39%).

Exhibit 8. Counselor Perceptions of Whether the Financial Aid Application Graduation Requirement Met Its Goal of Increasing the Number of Students Who Enroll in College

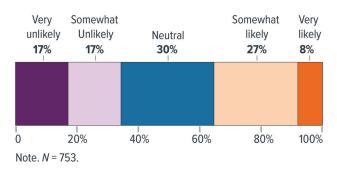
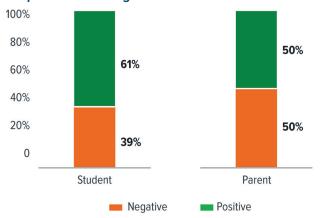


Exhibit 9. Types of Feedback That Counselors Reported Receiving From Students and Parents



Note. N = 552 counselors received feedback from students, and 200 received no feedback. N = 537 counselors received feedback from parents, and 214 received no feedback.

Additional Feedback for Policymakers, District Administrators, and State Education Officials

Finally, the survey asked counselors to share anything else that policymakers, district administrators, and state education officials should know about how the financial aid application graduation requirement is going. More than 300 counselors shared their perspectives; the following summarizes what they wanted policymakers, district administrators, and state education officials to know:

- The graduation requirement places a significant burden on high schools and counselors. Many counselors voiced concerns regarding the increased workload, the challenges and time commitment of tracking FAFSA/TASFA completion, and the difficulty in enforcing this requirement with students and families. More resources, training, communication, improved technology, and support for both school staff and families are needed.
- Parental involvement in the graduation requirement is a challenge. Counselors highlighted the difficulty of getting parents to participate in the financial aid application process, pointing out that parental reluctance often stems from privacy concerns or lack of necessary information or documents. Counselors noted that parents and students often view the requirement as an invasion of privacy or a forced disclosure of personal financial information, which leads to discomfort and opposition from parents to the requirement and prevents students from completing their applications.
- Counselors recognize the potential benefits of filling out a financial aid form but, do not think it should be a graduation requirement. Some counselors recognize potential benefits and express support for the requirement as it provides an opportunity to discuss with the student how to pay for college and encourage completion of the steps needed for a successful transition to college. However, counselors believe the

financial aid application should be encouraged, not required. Families view financial aid as a personal decision, and counselors are uncomfortable forcing parents to comply. Also, there is some skepticism that the requirement actually increased college enrollment. Some counselors believe it may have deterred some students who are overwhelmed or frustrated by the process.

Findings from the survey of Texas public high school counselors underscore the extensive impact the financial aid application graduation requirement has on counselor workloads and support to students and families. The graduation requirement will require more streamlined processes, enhanced resources, more frequent communication, and deeper support if the policy is going to meet Texas's broader efforts to increase the number of students who complete college and reduce student college debt. One counselor provided a comprehensive summary of what policymakers, district administrators, and state education officials should know about the financial aid application graduation requirement:

Policymakers, district administration, and state education officials should be aware of the importance of providing comprehensive student support and guidance throughout the financial aid application process. Adequate resources, such as workshops, one-on-one counseling, and accessible information, should be available to assist students in navigating the complexities of financial aid. Addressing equity considerations is crucial to ensure that all students, regardless of socioeconomic background, have equal access to financial aid resources. Efforts should be made to remove barriers, improve outreach, and provide additional support for students with limited financial literacy. Collaboration between educational institutions, financial aid offices, school counselors, and community organizations is vital for the successful implementation of the financial aid application graduation requirement. Strong partnerships can streamline processes, leverage resources, and ensure a cohesive approach to supporting students' financial aid endeavors. Regular tracking and evaluation of the requirement's effectiveness, including monitoring application completion rates and assessing long-term impacts on college affordability and enrollment, will provide valuable insights for policy adjustments and targeted support measures.

Counselor



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Appendix A. Data and Methods

This appendix describes the study's data sources, sample, and analysis methods.

Data Sources

The study used survey data collected May through December 2023. The 15-item survey was developed by the research team and administered online to 1,703 high schools in Texas. Administration of the survey occurred in two ways. Instructions and a unique link were first distributed to the email addresses of the school district superintendent on file in the most recent AskTED database. The instructions requested that the superintendent forward the survey link to the lead counselor of each of their high schools. Given the lack of responses received after survey distribution through district superintendents, the AIR survey team compiled counselor contact information from high school websites and sent instructions and a unique link directly to the lead counselor at the high school. A drawing for a \$25 Amazon gift card was provided to 10 respondents each week. After 2 months, a \$25 Amazon gift card was provided to all respondents.

Survey Participants

All 1,703 high schools in Texas were invited to respond to the survey. Schools invited to participate in the survey included all regular instructional schools classified as either high school or elementary/secondary schools, with an accountability rating of A, B, C, or Not Rated: Senate Bill 1365.⁵ The lead counselor in each high school was requested to fill out the survey. A total of 767 counselors responded to the survey, for a response rate of 45%.

Of the counselors who responded to the survey, more than 70% were experienced counselors, having 4 or more years of experience as a high school counselor (Exhibit A1). Thirty-eight percent of survey respondents were the only counselor in the high school, and 21% of respondents were one of six or more counselors in the high school.

Exhibit A1. Background Characteristics of Counselors Responding to the Survey

Survey Question	Respondents			
	Number	Percentage		
Years as a high school counselor?				
0-3	219	29%		
4–6	169	22%		
7–9	108	14%		
10 or more	266	35%		

⁵ For the Senate Bill 1365 rating, schools with a domain or overall score less than 70 were rated with this label.

Exhibit A1. (Continued)

Survey Question	Respondents		
	Number	Percentage	
How many counselors in your school, including yourself?			
1	286	38%	
2–3	209	28%	
4–5	101	13%	
6 or more	160	21%	
Primary role as counselor?			
Lead counselor	313	41%	
Guidance/academic counselor	214	28%	
College and career counselor/advisor	158	21%	
Other	81	11%	

Methods

When survey response rates are less than 85%, IES recommends a nonresponse bias analysis to compare the observed frequency distribution of background variables with its population distribution to establish whether the sample of survey respondents is representative of the target population on each background variable.⁶

Survey Nonresponse

Using high school data from the Texas Education Agency (TEA) and National Center for Education Statistics, we examined six characteristics of high schools: location of the high school district as designated by TEA, student enrollment, overall school accountability rating, whether the high school received a postsecondary readiness distinction, percentage of high school students that were economically disadvantaged, and percentages of high school students that were African American and Hispanic. We then calculated the mean difference between the original sample and response sample for each characteristic. We divided each mean difference by the respective standard deviation for the original sample (Exhibit A2). The standards recommend that nonresponse weighting be applied to analyses to account for any differences greater than 0.05 standard deviations.

⁶ NCEE Guidance for REL Study Proposals, Reports, and Other Products (2020)

Exhibit A2. Comparison of High Schools Invited to Participate in the Counselor Survey and the Response Sample, Unweighted

Characteristic		Sample 1,703)	Unwei Response (n = 1	Difference in <i>SD</i> Units	
	Mean	SD	Mean	SD	
District Locale Designation					
Charter School District	.09	.29	.06	.24	.10*
Independent Town	.05	.21	.05	.21	.00
Major Suburban	.16	.37	.14	.35	.05
Major Urban	.11	.32	.10	.30	.05
Nonmetropolitan Fast Growing	.02	.15	.02	.14	.01
Nonmetropolitan Stable	.11	.31	.13	.34	07*
Other Central City	.08	.27	.07	.25	.05
Other Central City Suburban	.13	.34	.14	.34	03
Rural	.25	.43	.30	.46	11*
High School Size (Student Enrollment)					
2,000 or more	.19	.39	.18	.39	.02
900 to 1,999	.19	.39	.17	.37	.05
600 to 899	.11	.31	.11	.31	.01
300 to 599	.23	.42	.23	.42	.00
Fewer than 300	.28	.45	.31	.46	07*
High School Accountability Rating					
A	.30	.46	.27	.44	.05
В	.52	.50	.55	.50	06*
С	.15	.36	.14	.35	.02
Not Rated: Senate Bill 1365	.04	.19	.04	.19	01
Postsecondary Readiness Distinction					
Earned	.64	.48	.66	.47	05
Not earned	.36	.48	.34	.47	.05
Student Demographics					
Percentage economically disadvantaged	57.7	23.6	56.5	22.8	.05
Percentage African American	9.7	13.2	9.1	12.6	.05
Percentage Hispanic	49.3	28.5	46.7	28.3	.09*

Note. * Indicates nonresponse weighting should be applied as difference is greater than 0.05 standard deviations.

Calculation of Nonresponse Weights for the Counselor Survey Sample

To account for the differences between the original sample and the response sample, we calculated nonresponse weights using a logistic regression model that included a binary indicator of whether a school was in the response sample as the dependent variable (coded as "1" if the school was in the response sample and "0" if the school was not). The response sample included schools that responded to Item 4 on the survey (see Appendix B). The model included the six independent variables for which the difference between the original sample and the response sample was greater than 0.05 standard deviations (i.e., schools in charter districts, schools in nonmetropolitan stable areas, schools in rural districts, schools with an overall accountability rating of B, schools with fewer than 300 students enrolled, and the percentage of Hispanic students enrolled). Using the results from the logistic regression, the study team calculated the predicted probability of accessing the survey for each school in the original sample. Next, we multiplied the inverse of the predicted probability for each school by the unit response rate to calculate the weight. Exhibit A3 presents the means and standard deviations for each of the key variables for the original sample alongside the weighted means and standard deviations for the analytic sample. Once the weights were applied, there were no differences between the original sample and response sample on key characteristics that were greater than 0.05 standard deviations.

Exhibit A3. Comparison of High Schools Invited to Participate in the Counselor Survey and the Response Sample, Weighted

Characteristic	_	Sample 1,703)	Weig Response (n = 7	Sample	Difference in <i>SD</i> Units
	Mean	SD	Mean	SD	
District Locale Designation					
Charter School District	.09	.29	.09	.29	.00
Independent Town	.05	.21	.05	.22	02
Major Suburban	.16	.37	.15	.36	.02
Major Urban	.11	.32	.11	.31	.02
Nonmetropolitan Fast Growing	.02	.15	.02	.14	.01
Nonmetropolitan Stable	.11	.31	.11	.31	.00
Other Central City	.08	.27	.08	.26	.02
Other Central City Suburban	.13	.34	.14	.35	04
Rural	.25	.43	.25	.43	.00
High School Size (Student Enrollment)					
2,000 or more	.19	.39	.20	.40	01
900 to 1,999	.19	.39	.18	.38	.02
600 to 899	.11	.31	.12	.32	01
300 to 599	.23	.42	.23	.42	.00
Fewer than 300	.28	.45	.28	.45	.00

Exhibit A3. (Continued)

Characteristic		Sample ,703)	Weig Response (n = 7	Sample	Difference in <i>SD</i> Units
	Mean	SD	Mean	SD	
High School Accountability Rating					
А	.30	.46	.28	.45	.03
В	.52	.50	.53	.50	01
С	.15	.36	.15	.36	01
Not Rated: Senate Bill 1365	.04	.19	.04	.20	02
Postsecondary Readiness Distinction					
Earned	.64	.48	.66	.47	04
Not earned	.36	.48	.34	.47	.04
Student Demographics					
Percentage economically disadvantaged	57.7	23.6	57.2	23.3	.02
Percentage African American	9.7	13.2	9.4	12.7	.02
Percentage Hispanic	49.3	28.5	48.5	28.6	.03

Note. Differences in standard deviation units indicate no differences in the original sample and response sample after weighting was applied.

Analysis

The research team used descriptive statistics to examine the weighted numbers and percentages of counselors who responded to each survey question. In addition, for the open-ended responses, we used the chat and completion playground within AIR's localized version of Azure OpenAI Studio, a service that uses generative artificial intelligence (AI) models to craft summarizations, content, and classification to summarize themes and identify illustrative quotes.

Appendix B. 2023–24 Counselor Survey

Texas Financial Aid Application Graduation Requirement—Spring 2023 Counselor Survey

140 1 111		
Why am I receiving this surve	ev invitation?	

Beginning with the 2021–22 school year, Grade 12 students in Texas have been required to complete a financial aid application (e.g., FAFSA or TASFA) or an opt-out form to graduate from high school. To understand how this financial aid application requirement is being implemented, the American Institutes for Research (AIR) is conducting a study to explore how the graduation requirement affects students' postsecondary trajectories. The study will examine student experiences with the application process and principals' and counselors' implementation of the requirement with students and families.

The purpose of this counselor survey is to find out how districts and high schools across Texas are promoting and implementing the new high school graduation requirement. The survey includes both multiple-choice items and short, open-ended questions. The survey will take approximately 10–15 minutes to complete. Please read the questions carefully and review all the response choices before making your selections.

Why	should I	particip	ate?						

We asked your principal to forward this survey to the college and career or lead counselor to complete. The survey asks for information about how the new graduation requirement is being communicated and implemented in your district. Your participation is voluntary, but your input will play an important role in knowing how the new graduation requirement is being rolled out across Texas. Your survey responses also help the Texas Education Agency (TEA) and the Texas Legislature better understand how the financial aid application graduation requirement has affected high school students and families.

Are my responses confidential? _____

Yes. Your responses are confidential to the extent permitted by law. No individuals or districts will be identified by name in the reporting of study findings, and only aggregate results will be shared. It also is important to note that AIR is not evaluating you or your district; rather, we are trying to ascertain how the new graduation requirement is being communicated and implemented in districts across Texas. Survey results from counselors will be aggregated in all reports, and all responses submitted will be anonymous. If any of the open-ended comments are used in future reporting, all identifying information (such as names of schools, districts, or individuals) will be omitted.

What are the risks and benefits of completing the survey?____

Responses to the survey are anonymous, so there are no inherent risks to completing the survey. Participation in the survey is voluntary, and refusal to participate will result in no negative consequences or loss of benefits to which the respondent is otherwise entitled. Respondents also may discontinue participation at any time without negative consequences or loss of benefits to which the participant is otherwise entitled.

W	ho	can l	I contact fo	r auestions	or support in	completina	the survey?

If you encounter technical or substantive issues with survey content during completion, or if you have concerns about this study, please direct your questions by phone or email to the principal investigator, Lynn Mellor, at (512) 391-6614 or lmellor@air.org. If you have concerns or questions about your rights as a research participant, contact AIR's Institutional Review Board (IRB), which is responsible for the protection of project participants, at IRB@air.org, toll free at 1-800-634-0797, or c/o IRB, American Institutes for Research, 1400 Crystal Drive, 10th floor, Arlington, VA 22202-3289.

By clicking on the "NEXT" button below and taking the survey, you consent to the use of your responses and comments anonymously in survey reports prepared by AIR.

Statement of Consent

If you agree to participate in the survey, click on the "NEXT" button below.

Part 1: Background and Training

1.	How many years have you been a high school counselor?
	O a. 0-3
	O b. 4–6
	O c. 7–9
	O d. 10 or more
2.	How many counselors are there in your school, including yourself?
	[Dropdown menu with 1 through 9 and 10 or more as options]
3.	Please indicate your primary role as counselor:
	a. Lead counselor
	b. Guidance/academic counselor (e.g., generalist)
	c. College and career counselor/advisor
	d. Dual enrollment specialist
	e. Testing coordination specialist
	f. Mental health counselor
	g. Other: (please specify)
4.	From whom did you receive training to help you implement the financial aid application graduation requirement? (Select all that apply.)
	a. Did not receive training
	b. Regional Education Service Center
	c. Local community college or university
	O d. Texas OnCourse
	e. Internal training from district-level or school-level staff
	Other: (please specify)
5.	Please describe other types of information or training you would like to receive that would help you implement the financial aid application graduation requirement.
	[Open unlimited text box]

Part 2: Communication and Providing Support to Students and Families

0.			o you inform students/families and parents about the financial aid application graduation
			ement? (Select all that apply for students and families.)
			Brochure/flyer
			Webinar
			District webpage
			Parent meetings
	0		Student handbook
	0		Video
	\bigcirc	•	Social media
	0		Email
	\bigcirc	i.	Other: (please describe)
7.			oes your school currently support students with completing the Free Application for Federal Studen AFSA) and/or Texas Application for State Financial Aid (TASFA)? (Select all that apply.)
	\bigcirc	a.	Meeting individually with students and/or parent(s)/guardian(s)
	0	b.	Weekend or evening sessions for students/families to receive assistance submitting the FAFSA/ TASFA at the school
	\bigcirc	c.	Providing referrals to community organizations specializing in college and/or financial aid assistance
	\bigcirc	d.	Monitoring FAFSA/TASFA submission and completion through a data dashboard
	\bigcirc	e.	Encouraging/reminding students/families to complete the FAFSA/TASFA
	\bigcirc	f.	Helping students interpret their Student Aid Report
	\bigcirc	g.	None
	\bigcirc	h.	Other: (please describe)
8.			external organizations, if any, does your school partner with to provide resources and support to help ts and parent(s)/guardian(s) complete the FAFSA or TASFA? (Select all that apply.)
	\bigcirc	a.	Advise TX/College Advising Corps
	\bigcirc	b.	Communities In Schools
	\bigcirc	c.	EMERGE
	\bigcirc	d.	Education is Freedom
	\bigcirc	e.	OneGoal
	\bigcirc	f.	Breakthrough
	\bigcirc	g.	Local college or university
	\bigcirc	h.	TRIO/Upward Bound
	0	i.	GEAR UP
	\bigcirc	i	External social workers, school psychologists, or counselors

	k. We do not partner with external organizations.	
	I. Other: (please describe)	
9.	at circumstances have necessitated your signing an opt-out form on behalf of a student? (Select t apply.)	: all
	a. Have not signed an opt-out form	
	b. Parent(s)/guardian refused to sign form	
	c. Student has not been able to receive FAFSA information from parent/guardian	
	d. Student is homeless	
	e. Student is not attending college	
	f. Other	
	option b or f is selected, then provide the following prompt:]	
	ease share more about the experiences or circumstances that have led to your signing an opt-out	form.
	pen unlimited text box]	
Part	Counselor Responsibilities	
	Counselor Responsibilities s your workload changed due to the financial aid application graduation requirement?	
	s your workload changed due to the financial aid application graduation requirement?	
	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe)	
10	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No	a
10	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No c. Not sure you feel you have adequate time to address parents' and students' needs regarding completing	a
10	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No c. Not sure you feel you have adequate time to address parents' and students' needs regarding completing FSA, TASFA, or opt-out form?	a
10	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No c. Not sure you feel you have adequate time to address parents' and students' needs regarding completing FSA, TASFA, or opt-out form? a. Yes	a
11.	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No c. Not sure you feel you have adequate time to address parents' and students' needs regarding completing FSA, TASFA, or opt-out form? a. Yes	
11. Part	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No c. Not sure you feel you have adequate time to address parents' and students' needs regarding completing FSA, TASFA, or opt-out form? a. Yes b. No: (please describe)	ent
11. Part	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No c. Not sure you feel you have adequate time to address parents' and students' needs regarding completing FSA, TASFA, or opt-out form? a. Yes b. No: (please describe) Perceptions of the Financial Aid Application Graduation Requirem	ent
11. Part	s your workload changed due to the financial aid application graduation requirement? a. Yes: (please describe) b. No c. Not sure you feel you have adequate time to address parents' and students' needs regarding completing FSA, TASFA, or opt-out form? a. Yes b. No: (please describe) Perceptions of the Financial Aid Application Graduation Requirem erall, what has been the feedback you received from students about completing the FAFSA or TABLE.	ent

13. Ove	eral	I, what has been the feedback you received from parents about completing the FAFSA or TASFA?
	a.	Positive
	b.	Negative
\bigcirc	c.	Have not received feedback
		kely is it that the financial aid application graduation requirement has met its goal of increasing the er of students who enroll in college?
	a.	Very unlikely
	b.	Somewhat unlikely
	c.	Neither unlikely nor likely (i.e., neutral)
	d.	Somewhat likely
	e.	Very likely
		e anything else you think policymakers, district administrators, and state education officials should about how the financial aid application graduation requirement is going?
(Ty	pe	your response in the box.)
[0	per	n unlimited text box]

Thank you for your time.

Your participation in this effort is sincerely appreciated!

