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# **We Shall Not Be Moved**

**A Policy Agenda to Achieve the National Imperative  
of Racial Equity and Diversity in Higher Education**

**September 2024**

# About the Policy Agenda

**We Shall Not be Moved<sup>1</sup>: A Policy Agenda to Achieve the National Imperative of Racial Equity and Diversity in Higher Education** was developed collaboratively over several months by members of the Higher Education Civil Rights Coalition. The Coalition, which is composed of civil rights and education organizations convened by The Leadership Conference Education Fund and The Leadership Conference on Civil and Human Rights, sought to identify policy recommendations to achieve the national imperative of racial equity in higher education in response to the U.S. Supreme Court’s decision to upend more than four decades of precedent and weaken equal opportunity in college admissions. Individual coauthors are identified by the logos on this page.

The Coalition continues to engage and educate diverse stakeholders and policymakers in pursuit of a higher education system that offers meaningful equal opportunity and success for all of the nation’s students, especially those who have been traditionally underrepresented due to historic and unfair barriers to opportunities. The policy recommendations that follow are informed by the knowledge, experience, and perspectives of the Higher Education Civil Rights Coalition.

The author and publisher are solely responsible for the accuracy of statements and interpretations contained in this publication.



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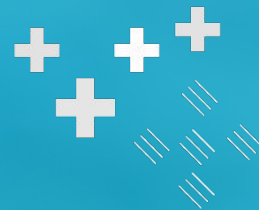
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# Introduction

**Our country thrives when we benefit from the talents and potential of students from all backgrounds and build respect for everyone. Yet our system of higher education has long fallen short of its duty to prepare all students to participate and lead in a robust, multiracial democracy.**

With recent attacks on a vital tool for eliminating unfair barriers to educational opportunity — affirmative action in college admissions — the need for a robust and inclusive agenda has become even more evident. While the U.S. Supreme Court may have taken away one vital path in its June 2023 decision in *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard*, there are many doors that remain open and where more can be done. Our belief in a nation where we bring down barriers to ensure that everyone — regardless of appearance or background — can get ahead demands a path forward. It is with this clarity of purpose and sense of urgency that we offer the included recommendations.

The opportunity to learn with and alongside students whose life experiences and perspectives are both similar to and different from their own is fundamental to higher education. The benefits of higher education are both societal and personal, as college-educated individuals are healthier, vote at higher rates, and are more likely to be employed with greater earnings.<sup>2</sup> Racial equity in higher education is essential to shaping the nation's future workforce, with nearly 72 percent of jobs projected to require a postsecondary degree or credential by 2031.<sup>3</sup> Our hope is that decades from now, we will

celebrate the creative approaches of advocates and policymakers working together to build a higher education system that offers equitable opportunities for all students — including those who are Black, Latine,<sup>4</sup> Asian American, Native Hawaiian and Pacific Islander, Native American,<sup>5</sup> and white.

Beginning in the 1970s, affirmative action<sup>6</sup> programs helped to dismantle legalized discrimination in higher education, leading to greater enrollment of students of color. For more than four decades, affirmative action and race-conscious admissions programs helped shape college campuses into more diverse and integrated learning communities. From the very beginning, these programs faced attacks, such as the one resulting in the U.S. Supreme Court's decision in *Regents of the University of California v. Bakke* in 1978. Although this decision did not eliminate the consideration of race in college admissions, it did reject the use of affirmative action to remedy societal discrimination, prohibited racial quotas, and insisted that if race was used as a factor, it must be considered as one of many.<sup>7</sup> In the more than 40 years between the *Bakke* decision and the decision in *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard*, the U.S. Supreme Court validated affirmative action policies four times. In 2003, the U.S. Supreme Court found in *Grutter v. Bollinger* that the Constitution supports the “use of race in admissions decisions to further a compelling interest in obtaining the educational benefits that flow from a diverse student body,” and the Court continued to uphold race-based affirmative action in *Fisher v. University of Texas* (2013) and *Fisher v. University of Texas at Austin* (2016).<sup>8</sup>



On June 29, 2023, after changes to the ideological makeup of the U.S. Supreme Court, the Court broke with decades of precedent and ruled that race-conscious admissions policies at Harvard University and the University of North Carolina (UNC) were inconsistent with the law.<sup>9</sup> While this decision was devastating, the U.S. Supreme Court did not take away students' freedom to fully express themselves in their college applications and share their talents, experiences, and contributions to the university community — and how race affects their lives. The U.S. Supreme Court's ruling also did not find that diversity was no longer a compelling state interest or that the pursuit of racial justice and diversity were inconsistent with the law.

Given all that we know about the benefits to individuals and to the nation as a whole that come from racial equity and diversity, as well as an unwavering commitment to our core values of equal opportunity, fairness, and inclusion, we must continue to invest in programs that eliminate discriminatory barriers and achieve the benefits of diversity through lawful means. Although the U.S. Supreme Court did limit a vital and irreplaceable tool for achieving the national imperative of racial equity and diversity, it did not prohibit the policies described in this document. While we disagree with the U.S. Supreme Court's misguided break from precedent and its backwards interpretation of civil rights laws, in this document we offer recommendations that are fully consistent with the new restrictions the U.S. Supreme Court has put in place. It is both possible and necessary to change policies at the federal, state, and institutional level to remove race-based barriers to opportunities in higher education and ensure a fair chance at success for all students.

While the U.S. Supreme Court has effectively closed the door on race-conscious admissions, it has kept other tactics fully open, such as recruitment and financial policy approaches. The civil rights community has always supported policies that did not explicitly consider race, while recognizing their limitations in achieving full equality. When affirmative action in education, employment, and contracting was eliminated in California in 1996, Black and Latino student enrollment at the University of California (UC) system declined.<sup>11</sup> A similar story has followed whenever affirmative action was eliminated. However, this future is not inevitable, and we must work together to keep open the doors of opportunity. Although opponents of racial

**“Nothing in this opinion should be construed as prohibiting universities from considering an applicant’s discussion of how race affected his or her life, be it through discrimination, inspiration, or otherwise.”<sup>10</sup>**

**—Chief Justice John G. Roberts, Jr.**



progress worked hard to end race-conscious admissions and shut students of color out from higher education, those who believe in fairness, equality, and opportunity must work even harder.

The promise and power of this nation will always lie in its ability to ensure that people of all races, backgrounds, and origins have the opportunity to pursue their dreams and goals. This policy agenda represents the civil rights community's ongoing work to achieve racial equity, diversity, and educational opportunity for all.

**We will continue in this fight together.  
We Shall Not Be Moved.**

The policy recommendations identified in **We Shall Not Be Moved: A Policy Agenda to Achieve the National Imperative of Racial Equity and Diversity in Higher Education** serve as an actionable tool for federal, state, and institutional advocates and policymakers. There is no one policy or approach that will be sufficient to overcome years of unequal educational opportunity. The breadth and depth of this agenda is designed to offer many starting places and paths forward depending on the context of the reader. In offering so many different ideas, we seek to demonstrate how much can be done in spite of recent wins by the opponents of racial progress. Equity and diversity are both possible and necessary. We look forward to working with all allies wherever we find them to move this work forward and create the future we all deserve.

**The policy recommendations are organized into the following issue areas:**

- Recruitment
- Admissions
- Finance
- Campus Climate
- Campus Support Programs
- Partnerships and P-12 Education Systems

In addition, throughout this agenda, we discuss current data collection and reporting practices and uplift the need to ensure that all students are reflected throughout postsecondary data on admissions, campus climate, completion, and student outcomes.

**Protecting and Preserving Diversity, Equity, Inclusion, and Accessibility (DEIA)**

Many well-intentioned diversity, equity, inclusion, and accessibility (DEIA) policies are under attack in the courts and in the court of public opinion. Critics suggest that DEIA programs and policies run afoul of federal laws, including the Equal Protection Clause of the 14th Amendment. While DEIA programs and race-conscious policies generally vary in their terms and scope, most DEIA programs and services, as well as the recommendations offered in this document, are lawful under federal statutory and constitutional laws.

Some of the recommendations are also required by federal law, such as data collection and reporting. They are also important tools to improve climates and to bring people across difference races and backgrounds together. Some state legislatures, governors, and university boards of trustees, among others, have enacted anti-DEIA policies through state or local laws, regulations, executive orders, and similar measures. Such policies frequently vary in their terms, scope, enforcement, and consequences. These anti-DEIA policies are often confusing and misunderstood, causing many lawful, laudable programs, positions, and services to become restricted or even canceled. Readers are encouraged to consult with their attorneys for legal advice to understand the rights and obligations of students, faculty, administrators, and greater society.

The policy recommendations in this document are offered as suggestions of ways to continue in the pursuit of racial equity and diversity. All policy decisions must be considered in their specific context and with their intended impact in mind. The specifics of legislation, implementation, and litigation will always be relevant. We are determined to move forward together and will always review and evaluate individual proposals in their specific contexts.





# Recruitment

# RECRUITMENT

1. Prioritize diversity, equity, inclusion, and accessibility in mission statements and set aspirational goals to address the enrollment of students from historically underrepresented communities. 11

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2. Conduct recruitment equity audits to explore how recruitment funds are used and the racial impact of decisions in the recruitment process. 13

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To achieve equal opportunity in higher education, institutions must take action at every stage to ensure that students feel welcome to apply and are set up to thrive on campus. The *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision does not limit higher education’s ability to expand their applicant pools by actively recruiting students of color through efforts ranging from parental engagement to increasing the diversity of faculty and staff. The responsibility to recruit and build an inclusive campus climate is shared among leadership and policymakers at all levels. Congress and state legislatures hold a significant role in ensuring that colleges and universities across the country provide academic, social, and economic opportunities for a diverse community of students. College presidents, deans, provosts, chancellors, and faculty at all levels shape campus cultures that are conducive to the development and long-term success of students. Federal, state, and institutional leaders at all levels should continue to establish policies and practices that demonstrate a commitment to racial equity in higher education.

#### Here’s what the federal government can do:

- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of best practices to eliminate unfair barriers to opportunity and prioritize diversity, equity, inclusion, and accessibility (DEIA) in their mission statements.

#### Here’s what state government can do:

- State higher education coordinating agencies<sup>12</sup> should establish an aspirational goal that state systems of higher education reflect the diversity of their state population, including socioeconomic, racial, and ethnic diversity.

#### Here’s what institutional leaders can do:

- Higher education institutions should set aspirational recruitment and enrollment goals and metrics mirroring the state’s socioeconomic, racial, and ethnic demographics among 18- to 24-year-olds.
- Higher education institutions should have a publicly available mission statement on diversity, equity, inclusion, and accessibility that addresses the enrollment of students from historically underrepresented communities.

**01** Prioritize diversity, equity, inclusion, and accessibility in mission statements and set aspirational goals to address the enrollment of students from historically underrepresented communities.



All students benefit when higher education institutions prioritize addressing discrimination and ensuring diversity, equity, inclusion, and accessibility in their mission and when they strengthen these efforts by setting aspirational enrollment goals for historically underrepresented students.<sup>13</sup> For example, the University of California — which offers one admissions deadline, direct admissions, and holistic review practices — has factored into their mission the need to:

→ Increase the percentage of undergraduates from underrepresented groups admitted to and/or enrolled.

→ Increase the percentage of first-generation undergraduate students admitted to and/or enrolled.

→ Increase the percentage of graduate students from underrepresented groups admitted to and/or enrolled.

→ Increase the percentage of faculty members, and tenured faculty, from underrepresented groups.

→ Increase the percentage of staff members at campuses, labs, and health locations from underrepresented groups.<sup>14</sup>

**California's decision to ban affirmative action undercut the fundamental principles of racial equity in higher education and limited institutional abilities to build campuses that reflect the diversity of the state. Since 1998, the enrollment of Black and Hispanic students at the University of California (UC) system has decreased by about 800 students per year.<sup>15</sup> Following the ban, the UC system has assessed, reevaluated,**

**and coupled policies, such as offering a single application deadline and adopting holistic reviews for all applicants. Despite these efforts, the UC system remains less diverse than before the decision. California's story shows both the harms of eliminating affirmative action and the need for a comprehensive agenda and engagement from all stakeholders to continue progress.**

# 02

## Conduct recruitment equity audits to explore how recruitment funds are used and the racial impact of decisions in the recruitment process.

### Here's what the federal government can do:

- The U.S. Department of Education should collect and share best practices on recruitment equity audits and assessing the racial impact of decisions in the recruitment process.

### Here's what state government can do:

- State legislatures should require institutions to conduct recruitment equity audits, evaluate how recruitment funds are used, and assess the racial impact of decisions in the recruitment process.

### Here's what institutional leaders can do:

- Higher education institutions should conduct recruitment equity audits, evaluate how recruitment funds are used, and assess the racial impact of decisions in the recruitment process.
- Higher education institutions should share their findings from recruitment equity audits in an easily accessible and publicly available manner.

Equity audits serve as a tool to identify and address inequities in the recruitment process. Recruitment equity audits should be adopted at higher education institutions to better address disparities in student opportunities and outcomes. Recruitment equity audits should include:

- Percentage of institutional funding that goes to recruiting from predominantly white communities and high schools compared to communities and high schools where the students are predominantly students of color.
- How relationships between high school counselors and admissions officers are developed and whether more needs to be done to build relationships with high schools with a larger share of students of color.
- Whether the institution provides funds to students with lower incomes to participate in campus visits.
- Participation in college fairs and information sessions in communities and high schools with a large share of students of color.
- Investigating all recruitment processes and assessing their racial impact.
- A comparison of in-state and out-of-state recruitment resources.



# 03

## Prioritize the recruitment and enrollment of community college transfer students.

### Here’s what the federal government can do:

- The U.S. Department of Education should regularly collect, conduct, and disseminate data on transfer partnerships between two- and four-year higher education institutions.
- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of best practices on transfer and community college partnerships.

### Here’s what state government can do:

- Governors and state legislatures should set goals and metrics to increase the enrollment of community college transfer students at four-year higher education institutions.

### Here’s what institutional leaders can do:

- Four-year higher education institutions should partner with community college systems to strengthen their transfer agreements, including stronger course alignment.
- In an easily accessible and publicly available manner, higher education institutions should share their articulation agreements that have been established with other two- and four-year institutions.
- Higher education institutions should facilitate the transfer process by providing advising to transfer students.

Black and Latino students represent:

**41%** OF STUDENTS ENROLLED at two-year community colleges.<sup>16</sup>

Higher education institutions, both public and private, should remove barriers for transfer students, such as credit loss, by partnering with community college systems and building stronger transfer agreements.

There are nearly 9 million students enrolled in community colleges, making up 41 percent of undergraduate students nationwide.<sup>17</sup> In 2023, the U.S. Department of Education released data on transfer rates and student success between two- and four-year colleges and universities, showing that most transfer students enrolled in public colleges and universities. Less than 1 percent of private four-year institutions had enrolled at least 30 transfer students.<sup>18</sup>

According to the 2022-2023 Common Data Set,<sup>19</sup> transfer students of admitted applicants represented just

**3%** AT PRINCETON UNIVERSITY<sup>20</sup>

**1%** AT YALE UNIVERSITY<sup>21</sup>

**<1%** AT HARVARD UNIVERSITY<sup>22</sup>

For nearly three decades, Princeton University did not accept a single transfer student and only began to accept transfer students after 2018.<sup>23</sup>



## 04 Prioritize the recruitment and enrollment of in-state students.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate data on the share of in-state students by institution type (private, public, and community college).

### Here's what state government can do:

- Governors and state legislatures should set in-state student enrollment goals at all four-year institutions, mirroring the state's racial and ethnic demographics among 18- to 24-year-olds.
- State legislatures should adequately fund higher education institutions and discourage recruitment of out-of-state students for the purposes of increased revenue.
- States should provide more funding to higher education institutions that enroll high proportions of in-state students.

### Here's what institutional leaders can do:

- All higher education institutions should set goals and metrics to recruit and increase the enrollment of in-state students.

Policymakers should break the cycle of higher education institutions relying on out-of-state funding and equitably fund institutions enrolling high proportions of in-state students.

Out-of-state students usually pay two to three times more than in-state students to attend an institution of higher education. For this reason, many colleges and universities, including private and public institutions, recruit large numbers of out-of-state students from wealthier high schools to generate revenue.<sup>24</sup> Although the majority of first-year classes at state flagship systems are in-state students, the share of in-state students attending flagships has declined since 2002.<sup>25</sup> Research suggests that nearly every state flagship university increased its share of out-of-state students from 2002 to 2018.<sup>26</sup>

## Prioritize recruitment at Title I public high schools.

## 05

### Here's what institutional leaders can do:

- Higher education institutions should establish, expand, and prioritize targeted outreach in communities with high proportions of students with lower incomes.
- Higher education institutions should host college fairs and prioritize recruiting at Title I public high schools.

Title I of the Elementary and Secondary Education Act (ESEA) provides supplemental federal funding to schools and districts with high concentrations of students with lower incomes, which may often lack the resources to meet the needs of the students they serve. Targeted recruitment at Title I schools is a valuable way for colleges and universities to get the word out to lower income students about their course offerings and to help

overcome barriers to higher education related to lower college knowledge in higher poverty communities. Too often, colleges and universities limit their recruiting to disproportionately white and wealthy schools. In one study, for example, colleges and universities visited high schools where the average family income in the neighborhood exceeded \$100,000, and they did not visit nearby high schools where the average family income was \$60,000 to \$70,000.<sup>27</sup>

# 06

## Create partnerships between higher education institutions and high schools to provide high-quality mentorship and recruitment pipelines.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on the effectiveness of high school mentorship programs and their impact on the college enrollment of students of color, first-generation students, and students with lower incomes.
- The U.S. Department of Education should ensure that higher education institutions and public high schools have access to and an understanding of best practices to create mentorship programs that increase college enrollment for students of color, first-generation students, and students with lower incomes.
- Congress should provide funding to support partnerships between institutions of higher education and high schools to support college-going for underrepresented students.

### Here's what state government can do:

- State legislatures should provide funding for mentorship partnerships.

### Here's what institutional leaders can do:

- Higher education institutions should partner with public high schools to create mentorship programs that support underrepresented students and provide a recruitment pipeline.
- Higher education institutions should allow college students to earn academic credits for their volunteer mentorship.
- Higher education institutions should also support campus organizations that provide service-learning opportunities or can facilitate regular meetings with mentees and mentors.
- Higher education institutions should facilitate the use of work study funds to support students who serve as mentors.

Higher education institutions should support the pursuits of underrepresented high school students by developing mentorship programs that encourage enrollment into higher education. Research suggests that when first-generation students had access to multiple mentors and spent more time with them, it increased their likelihood of enrolling in college.<sup>28</sup> College students and college-educated adults can serve as peer mentors, offering guidance on their pathway to and preparation for college.







# 07

**Invest in programs that support students of color, first-generation students, and students with lower incomes and their knowledge of and access to higher education.**

### Here's what the federal government can do:

- Congress should increase investments in programs that support first-generation students and students with lower incomes to prepare for and enroll in college, such as Federal TRIO and GEAR UP programs.

### Here's what state government can do:

- State legislatures should fund state programs and provide matching funds for federal programs that support college access for marginalized students.

### Here's what institutional leaders can do:

- Higher education institutions should have dedicated staff and student support services for students of color, first-generation students, students with lower incomes, and students with disabilities.

The Federal TRIO Programs include eight programs targeted towards supporting

first-generation students, students with lower incomes, and students with disabilities in progressing from middle schools to postbaccalaureate programs. The programs include Educational Opportunity Centers, Ronald E. McNair Postbaccalaureate Achievement Scholarships, Student Support Services, Talent Search, Training Program for Federal TRIO Program Staff, Upward Bound, Upward Bound Math-Science, and Veterans Upward Bound.<sup>29</sup> Recipients of TRIO-supported services are more likely to persist through and complete college than students who do not receive these support services.<sup>30</sup> More than 800,000 students with lower incomes, first-generation students, and students with disabilities benefit from these TRIO-supported services annually, including tutoring, career advising, counseling, mentoring, and financial guidance.<sup>31</sup>

The federal Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) is one of the largest programs dedicated to the college and career readiness of students from lower income communities across the country. GEAR UP serves more than 571,236 students at more than 2,792 secondary schools. Yet, only a fraction of GEAR UP eligible students, or 1 in 5 applicants, are funded to participate in the program. GEAR UP can also provide college scholarships to students with lower incomes.<sup>32</sup> Given the impact of TRIO, GEAR UP, and similar programs, increased investments are needed.



# 08

## Expand access to application fee waivers for students of color, first-generation students, and students with lower incomes.

### Here's what state government can do:

- State legislatures should require higher education institutions to expand access to application fee waivers, particularly for students of color, first-generation students, and students with lower incomes.

### Here's what institutional leaders can do:

- Higher education institutions should expand access to application fee waivers for students of color, first-generation students, and students with lower incomes.

Policymakers should expand access to application fee waivers for students of color, first-generation students, and students with lower incomes.

The cost of college begins long before enrollment, with expenses adding up such as application fees, taking standardized tests, and submitting those test scores to higher education institutions. While the average college application fee is about \$45, 64 institutions of higher education, including several highly selective institutions, have application fees of over \$75.<sup>33</sup> These application costs disproportionately impact students with fewer financial resources. For high school seniors who apply to seven or more schools, their average cost in application fees will be between \$132-\$308.<sup>34</sup>

### Some current eligibility criteria for college application fee waivers include:

- Eligibility for free or reduced-price lunch
- Annual family income within guidelines set by the USDA Food and Nutrition Service
- Enrollment in federal, state, or local student aid programs for families with lower incomes
- Receiving public assistance
- Living in federally subsidized public housing or a foster home, or experiencing homelessness
- Being a ward of the state or an orphan

Despite these eligibility criteria, the cost of application fees continues to be a barrier for students who may not meet these requirements.

## Prioritize parental engagement in recruitment programs dedicated to students of color, first-generation students, and students with lower incomes.

# 09

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on effective strategies for engaging parents in recruitment programs for students of color, first-generation students, and students with lower incomes.



### Here's what state government can do:

- State legislatures should fund culturally informed recruitment programs targeted at increasing applications from students of color, first-generation students, and students with lower incomes in state higher education institutions.

### Here's what institutional leaders can do:

- Higher education institutions should develop culturally informed parent orientation programs for prospective students of color, first-generation students, and students with lower incomes, as well as prioritizing language accessibility.
- Higher education institutions should have dedicated staffing to serve as family liaisons or coaches to address the questions or concerns that families of first-generation students, students of color, and students with lower incomes may have.

Higher education institutions should recognize, establish, and prioritize the systems of support, orientation, and ongoing coaching that students of color, first-generation students, and students with lower incomes — and their families — may need as they progress through their academic careers.

**First-generation students are often central figures in their families, providing financial and social support, caregiving for siblings, and help with language barriers. First-generation students represent**

**54% OF UNDERGRADUATE COLLEGE STUDENTS,<sup>35</sup>**

**and the median income of their families is \$49,000 less than that of continuing-generation students.<sup>36,37</sup>**

**Support the recruitment and college completion of rural students of color and rural students with lower incomes.**

**10**

### Here's what the federal government can do:

- Congress should increase federal funding for Rural Serving Institutions (RSIs) to support the enrollment and completion of students from rural communities.
- Congress should expand broadband access in education deserts<sup>38</sup> and establish subsidies to offset internet costs for households with lower incomes.

### Here's what state government can do:

- State legislatures should establish targeted recruitment and attainment goals for students with lower incomes from rural areas.
- State legislatures should increase state aid to RSIs.
- State legislatures should establish a matching grant for programs that support the recruitment and completion of students from rural communities.
- Higher education coordinating agencies should offer technical assistance and guidance to higher education institutions on applying for state and federal aid that supports the recruitment and college completion of rural students.

### Here's what institutional leaders can do:

- Higher education institutions should provide virtual campus visits or fly-in programs, providing prospective students with travel vouchers to schools they may not have the financial resources to visit.
- Higher education institutions should offer financial support for students with lower incomes from rural areas to access textbooks, emergency aid, and resources that meet their needs.
- Higher education institutions should develop partnerships with secondary schools in rural areas and send recruitment ambassadors to their schools.

Federal, state, and institutional policymakers and leaders should provide greater support for the recruitment and college completion of rural students, particularly students of color.

Rural communities in the United States are rich in diversity, with people of color representing between 20 to 25 percent of all rural populations.<sup>39</sup> In southern states, many rural counties are largely Black, and in the rural Southwest a significant share of rural residents are Latino.<sup>40</sup> Many Native American students are nearly entirely educated in rural areas.<sup>41</sup> State legislatures should establish and create goals for the recruitment and attainment of rural students of color and rural students with lower incomes. Higher education institutions can also prioritize the recruitment of rural students by providing virtual campus visits and provide travel vouchers to fly in for visits.



**Provide opportunities for students of color, first-generation students, and students with lower income to support the recruitment, admissions, and persistence of prospective students.**

**11**

### Here's what institutional leaders can do:

- Higher education institutions should recruit students of color, first-generation students, and students with lower incomes to serve as tour guides, resident advisors, and admissions staff. Students should be compensated appropriately for their work.

All students can benefit when they feel understood and reflected across the campus community where they live and learn. Higher education institutions have the opportunity to provide first-generation students with a stronger sense of belonging by ensuring that their admissions offices and housing facilities are diverse and staffed with students they can connect with.

# 12

## Establish recruitment and retention initiatives that address racial and ethnic diversity among university faculty and staff.<sup>42</sup>

### Here's what the federal government can do:

- Congress should request a U.S. Government Accountability Office (GAO) report to study the effectiveness of recruitment and retention strategies dedicated to diversifying campus faculty and staff.
- The U.S. Department of Education should collect, conduct, and disseminate research on best practices on the hiring and retention of underrepresented faculty and staff at private and public higher education institutions.
- The Department of Education and Equal Employment Opportunity Commission should implement the recommendations of GAO's March 2024 study on employment discrimination in higher education.

### Here's what state government can do:

- State legislatures should set aspirational benchmarks to reflect the state's demographics in postsecondary faculty and staff.
- State legislatures should fund strategies for the recruitment and retention of diverse faculty and staff.
- State legislatures should require higher education institutions to establish diversity statements in their hiring practices for faculty and staff.

- Higher education coordinating agencies and board of trustees should set aspirational goals for faculty and staff diversity across state systems of higher education.
- Higher education coordinating agencies should facilitate the sharing of best practices across colleges and universities.
- State higher education coordinating agencies should make information about faculty and staff diversity publicly available for prospective students.

### Here's what institutional leaders can do:

- Higher education institutions should build and strengthen their recruitment initiatives to diversify university faculty and staff.
- Higher education institutions should create more tenure track positions and pathways to tenure track positions, such as postdoctoral fellowships.
- Higher education institutions should revise their policies and norms to achieve pay equity.
- Higher education institutions should ensure that faculty are compensated and supported for their service work.

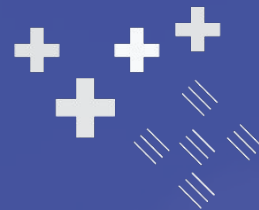
Students deserve to see themselves reflected through a diverse learning environment and to be prepared to thrive in an interconnected world. Higher education institutions should ensure that their institutional policies recruit, support, and retain underrepresented faculty.

A community of diverse faculty and staff in higher education reflects the broader tapestry of society and supports the learning of all students in higher education. Faculty and staff who are of different racial and ethnic backgrounds, and those who identify as LGBTQIA+, bring a wealth of strengths, perspectives, and experiences that enrich college campuses. Many students of color consider faculty of color as mentors and role models, often looking to them for guidance and support. Moreover, faculty diversity and a sense of belonging are key contributors to student success and positively support the overall graduation rate of students of color.<sup>43</sup>

Despite these benefits, people of color are underrepresented in faculty and staff positions in postsecondary education. Of faculty and staff in higher education, only

- 12% ARE ASIAN AMERICAN**
- 6% ARE BLACK**
- 6% ARE LATINO**
- <0.5% ARE NATIVE AMERICAN<sup>44</sup>**





# Admissions

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Although the U.S. Supreme Court’s decision in *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* rejected the use of affirmative action in postsecondary admissions, higher education institutions across the country cannot ignore how race impacts students’ lives — including their access to college. Education is a fundamentally transformative experience that can offer millions of people in the United States the opportunity for social and economic mobility. Despite their talents, skills, and self-determination, many students of color, especially those from families with lower incomes, will confront significant barriers spanning through P-12 systems to the college admissions process. Research shows that students from the top 1 percent of household incomes are 77 times more likely to be admitted to and attend an Ivy League school than students from households earning less than \$30,000 a year.<sup>45</sup> Higher education institutions should continue to prioritize educational opportunity for all through a combination of admissions policies that value the talent and skills of students, including how race has shaped their educational experiences. Regardless of where students lived and learned, or their racial and ethnic background, all students deserve an equitable opportunity to enroll in and graduate from higher education.

High-quality, disaggregated data by race, ethnicity, sex (including sexual orientation, gender identity, sex characteristics, and pregnancy),<sup>46</sup> national origin, and disability<sup>47</sup> are necessary to guide policies that address opportunity barriers in higher education

admissions and enhance campus communities. Policymakers must work to ensure that all students are represented and reflected throughout their data collection and reporting practices.

## What admissions data does the U.S. Department of Education collect?

Every December, the [Integrated Postsecondary Education Data System](#) (IPEDS) collects basic information about the undergraduate selection process for entering first-time, degree/certificate-seeking students from the Fall term. Currently, IPEDS publishes the following data on the admissions process for each institution, *none of which* are disaggregated by race, ethnicity, or socioeconomic status:

- the number of applications
- the number of admissions
- the number of enrollments
- the SAT and ACT scores of enrolled students
- whether a higher education institution considers legacy status

## Changes in IPEDS data collection and reporting:

In addition to the already existing survey, in December 2025, the U.S. Department of Education plans to:<sup>48</sup>

- Collect data on applications and admissions disaggregated by race and ethnicity.
- Collect data on applications, admissions, and enrollment for early decision and early action.

# 13

## Provide a single application deadline, eliminating early decision and early action.

### Here's what the federal government can do:

- As an interim measure, the U.S. Department of Education should collect, conduct, and disseminate disaggregated data on early decision and early action admissions.

### Here's what state government can do:

- State legislatures should require higher education institutions to end the use of early decision and early action and adopt a single decision deadline in their admissions process.

### Here's what institutional leaders can do:

- Higher education institutions should end the use of early decision and early action plans and adopt a single decision deadline.
- Higher education accreditors should encourage higher education institutions to end the use of early decision and early action and adopt a single decision deadline.

Federal, state, and institutional policymakers should lift the barrier of early decisions and action programs by precluding their usage and adopting a single decision deadline so all admitted applicants can make decisions with a full understanding of their financial aid options and so that students with greater access to early college knowledge aren't given priority.

Early decision programs allow students to apply to colleges or universities in the Fall and receive an admission decision by December of the year before they enter college (months before the regular deadline). However, by applying through early decision, students commit to attending the institution if accepted. Students who apply through regular decision make no such commitment and have greater opportunities to compare financial aid offers across higher education institutions. This practice of varied application deadlines and privilege for earlier decisions exacerbates inequities in the admissions process because it requires a commitment from applicants before they have full knowledge of their financial aid options.

Early admissions programs, particularly early decision, may give an unfair advantage to applicants from families with more access to college counseling and financial resources who do not need to consider financial aid awards in their decisions. Not only are early decision and early action primarily used by students with more wealth and resources, the decision to apply early is also influenced by social and cultural capital. In 2019, 48 percent of private high schools reported having at least one counselor dedicated solely to providing college counseling, compared to only 29 percent of public schools.<sup>49</sup> This disparate access to counseling results in inequitable early college knowledge.

The accumulation of social and financial barriers experienced by historically underrepresented students may deter them from considering early decision. In the Fall of 2021, applicants from wealthier ZIP codes were twice as likely to apply through early

decision compared to all other applicants, and the percentage of students enrolled via early decision has continued to increase in recent years.<sup>50</sup> Early decision applicants have an admissions advantage over those applying through regular decision — especially at highly selective institutions like Brown University and Duke University, where the likelihood of admission through early decision exceeded four times that of regular decision applicants.<sup>51</sup>

Through early action, applicants receive an admissions decision early and can consider the offer, but they do not have to commit upon receipt. They can continue to apply to other colleges through regular admissions. Although this practice does not present the same problem in comparing financial aid offers as in early decision, it still creates a benefit for students who have access to greater college counseling. In 2021, Harvard University received 26,560 more regular decision applications than early action applications. However, the institution admitted almost as many applicants from early action (938) as from regular decision (1,118).<sup>52</sup> In 2022, 608 colleges and universities offered early decisions and/or early action (although only 206 received applications through these alternative deadlines).<sup>53</sup>

**Applicants from wealthier ZIP codes are twice as likely to apply through early decision compared to all other applicants.<sup>54</sup>**



## **Who collects and reports data on early decision?**

Disaggregated data are essential for identifying and addressing barriers that may be part of the admissions and enrollment process. Policymakers should gain a better understanding of how students are served by their institutions and ensure that underrepresented students are reflected in data collection and reporting. However, the U.S. Department of Education does not yet collect specific data on early decision admissions and will only begin to do so in December 2025. The available data on early decision admissions come from the Common Data Set Initiative, a collaboration of U.S. News & World Report, Peterson's, and the College Board. While the Common Data Set serves as a valuable resource, it relies on a private collaboration that lacks the oversight to ensure universities accurately complete their surveys. This issue was highlighted by discrepancies from Columbia University, which was found to have misrepresented data to the Common Data Set.<sup>55</sup> In addition, several universities and colleges offering early decision, including New York University, University of Chicago, and Boston College have often refrained from reporting the number of applications and students admitted through early decision.

# 14

## End legacy preferences in the admissions process that perpetuate historical racial inequity.

### Here's what state government can do:

- State legislatures should require higher education institutions to end the practice of legacy preferences in their admissions process.

### Here's what institutional leaders can do:

- Higher education institutions should end the practice of legacy preferences in their admissions process.
- The Common Application and individual institutional applications should refrain from asking applicants where their parents, siblings, and other family members attended college.

Legacy preferences<sup>56</sup> in the admissions process often contribute to the wealth, class, and racial inequities that higher education institutions seek to address.

Colleges and universities that use legacy preferences allow students to indicate if a relative previously attended the institution, conferring a positive benefit to those students in the consideration of their applications. These preferences are unrelated to the merits of an individual application and privilege those students who benefit from generational privilege and systemic racism. These policies benefit students whose families had the resources to attend college and were legally permitted to attend because of their race. Legacy status reinforces a cycle of inequity

within the admissions process by benefiting students with more financial resources and social capital at the expense of opportunities for historically underrepresented students. As evidence of the ways that this policy reinforces generational privileges, at many highly ranked universities and colleges the number of enrolled students whose relatives attended that institution is greater than the total number of enrolled Black students.<sup>57</sup> According to the National Center for Education Statistics, in the Fall of 2022, 30 percent of selective higher education institutions, or 579 institutions, considered legacy status in their admissions process.<sup>58</sup> Notably, a study of a dozen highly selective, private colleges found that legacy admissions are a driving mechanism for higher admissions rates among the richest of applicants.<sup>59</sup>

Institutions of higher education are already responding to the deep inequities perpetuated by legal preferences by eliminating reliance on them in admission practices. Since 2015, more than 100 colleges and universities have stopped providing legacy preferences. In 2021, Colorado became the first state to end the use of legacy preferences for all public institutions, and in 2024 Virginia and Maryland became the second<sup>60</sup> and third<sup>61</sup> states, respectively, to end the practice. Since the U.S. Supreme Court's ruling on affirmative action in 2023, Virginia Tech became the second public institution and the fourth overall to eliminate the use of legacy preferences in their admissions practices, joining the University of Minnesota-Twin Cities and two private liberal arts colleges, Occidental College and Wesleyan University.<sup>62</sup> The University of Georgia and Texas A&M systems also eliminated legacy preferences shortly after the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard*





decision.<sup>63</sup> More states can follow suit by eliminating legacy preferences, leading higher education institutions to create more equitable admissions processes. Legislative action is also important to remove barriers to accessing postsecondary education.

Higher education institutions that lift this barrier in the admissions process have the opportunity to promote greater racial equity and build stronger, socioeconomically diverse campuses. Many institutions, such as the University of North Carolina at Chapel-Hill,<sup>64</sup> excluded Black and other students of color by law and practice for many years and today maintain legacy policies that directly disadvantage the descendants of students who were barred from entry.

**As evidence of the ways that this policy reinforces generational privileges, at many highly ranked universities and colleges the number of enrolled students whose relatives attended that institution is greater than the total number of enrolled Black students.<sup>65</sup>**

## Take immediate steps to reduce the harm of legacy considerations.

# 15

### Here's what the federal government can do:

- Congress should create conditions on institutional aid for higher education institutions to discourage the continued use of legacy preferences in their admissions process.
- Congress should incentivize an end to legacy preferences by lowering the endowment tax on higher education institutions that have eliminated the practice and imposing an additional tax on institutions that continue to offer it.
- The U.S. Department of Education should collect, conduct, and disseminate research on the use of legacy preference admissions and financial aid practices.
- The U.S. Department of Education Office for Civil Rights should issue guidance urging the rejection of the consideration of legacy status in admissions given the disparate disadvantage it creates for students of color.



### Here's what state government can do:

- State legislatures should create conditions on state aid related to the end of legacy preferences.
- Higher education coordinating agencies should ensure higher education institutions are redacting legacy status information provided by the Common Application in their admissions process.

### Here's what institutional leaders can do:

- Higher education institutions should redact legacy status information provided by the Common Application in the admissions process.

Recognizing that it may take time to eliminate legacy preference policies and practices, there are intermediate steps that can and should be taken, including ensuring access to data about where and how legacy preferences continue to be used. The Integrated Postsecondary Education Data System (IPEDS), a data collection administered by the U.S. Department of Education, requires colleges to report whether they consider legacy status.<sup>66</sup> These data are also collected and reported by the Common Data Set (CDS), a collaborative effort among the College Board, Peterson's, and U.S. News & World Report.<sup>67</sup> Because the two collections use different definitions, there are data discrepancies that make it hard to evaluate the use of legacy consideration in admissions.<sup>68</sup> The definition of legacy preference for all data collections should reflect whether a higher education institution asks where an applicant's parents went to college or includes that information in an applicant's admissions file.

## Disaggregate data about admissions, retention, graduation, and outcomes in higher education.

# 16

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate disaggregated admissions data by race, ethnicity, sex,<sup>69</sup> national origin, and disability.

### While IPEDS collects important data on the admission and enrollment of students, the U.S. Department of Education and higher education institutions should collect and report the following data:

- Whether an institution of higher education offers early decision and early action.
- The number of early decision and early action applications received and admitted.
- The number of early decision and early action applicants admitted.
- The number of early decision and early action admits enrolled.
- Percentage of admittance from early decision, early action, and regular decision.
- Whether an institution of higher education offers legacy preferences.
- The number of legacy applications received.
- The number of legacy applicants admitted.
- The number of legacy admits enrolled.
- The number of students admitted by high school type (public, private, and homeschool).



- K.** The number of students enrolled by high school type (public, private, and homeschool).
- L.** The number of athletes admitted and enrolled.
- M.** Data for B-D and G-L disaggregated by race, ethnicity, sex, national origin, and disability.<sup>70</sup>
- N.** Enrollment data for D, I, K, and L disaggregated by Pell status.
- O.** Retention data, graduation rates, and outcome measures for students with disabilities.

*For more information and resources to improve the lives of people identified with learning disabilities, visit the [National Center for Learning Disabilities \(NCLD\)](#).*

*For more information on research, training, education, and service to promote the quality of life, health, and well-being of people with disabilities, visit [The Association of University Centers on Disabilities \(AUCD\)](#).*

# 17

## Include disability among the identity categories for which data are disaggregated.

### Here's what the federal government can do:

- The U.S. Department of Education should include disability among identity categories in disaggregated data.

The fight for equal educational opportunity in higher education and disability justice are deeply intertwined.<sup>71</sup> Relative to their white and/or non-disabled counterparts, people of color with disabilities experience compounded discrimination and face significant barriers in education,<sup>72</sup> employment,<sup>73</sup> and health care.<sup>74</sup> The higher education system must better serve current and future students of color with disabilities. Including information about the recruitment, admissions, retention, and completion of students with disabilities will contribute to an understanding of whether there are equal educational opportunities.

## Award financial aid without consideration of a student's legacy status.

# 18

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on financial aid and scholarships that take into consideration a students' legacy status.

### Here's what state government can do:

- State legislatures should require higher education institutions to award financial aid and scholarships without consideration of a student's legacy status.

### Here's what institutional leaders can do:

- Higher education institutions should award financial aid and scholarships without consideration of a student's legacy status.
- Higher education institutions should create scholarships for first-generation students and other students who do not benefit from generational privileges.



Even if colleges and universities were to consider applicants without taking into account their legacy status, advantaging students with relative alumni connections in awarding aid similarly reinforces generational privilege and opportunity.

# 19

## Adopt holistic review practices in the admissions process.

### Here's what the federal government can do:

- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of best practices on holistic review practices.
- The U.S. Department of Education should collect, conduct, and disseminate research about best practices in admissions that promote campus diversity and racial equity.
- The U.S. Department of Education Office for Civil Rights should publish guidance and provide technical assistance to support the use of holistic admissions processes that are free from bias and discrimination.

### Here's what state government can do:

- Higher education coordinating agencies should share best practices for higher education institutions to incorporate holistic reviews in their admissions practices.
- State legislatures should require higher education institutions to provide annual training on holistic review to admissions faculty and staff. State legislatures should provide funding for this purpose.

### Here's what institutional leaders can do:

- Higher education institutions should adopt holistic reviews in their admissions practices, frequently reviewing criteria to eliminate bias and discrimination.
- Higher education institutions should be transparent about their admissions criteria, explaining to prospective students what criteria are considered and in what ways.
- Higher education institutions should ensure that information about their holistic review process is shared in recruitment materials, catalogs, student handbooks, and on publicly available websites.
- Higher education institutions should provide training on holistic reviews on a consistent and annual basis to admissions faculty, staff, and all application reviewers.

Holistic admissions practices are those where multiple sources of evidence of a student's talent, skills, experience, and likelihood of success are taken into account in the admissions process. All students can benefit from holistic admissions reviews through consideration of their background, including their responsibilities, their experiences, their interests, contributions to their communities, and how these factors collectively can enrich the campus community. The U.S. Supreme Court was clear that adopting holistic admissions practices is consistent with the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision — so long as the benefit is given on the basis of “experience as an individual.”



Public and private institutions that adopt holistic review practices can consider applicants more thoughtfully than higher education institutions that are reliant on narrow and flawed metrics, such as access to extracurriculars, personalized letters of recommendation, and SAT and ACT scores. For students from the bottom 20 percent of the income distribution, only about a quarter will take the SAT or ACT, and only about 2.5 percent will score 1300 or higher on the SAT.<sup>75</sup> Research suggests that evaluating a student's application within the context of the opportunities available where they learn and live may offer colleges and universities a chance to review applications more equitably.<sup>76</sup> By following holistic review approaches, admissions officers can build more diverse campuses and reap the benefits of a student body with a range of previous experiences, rather than making decisions based on narrow and flawed data that are well-documented to benefit applicants who have had more access to financial, social, and cultural capital.<sup>77</sup>

Holistic reviews in admissions are mission-driven, and the process reflects integrity and fairness. **Holistic reviews include three characteristics:**

- Mission alignment to advance institutional goals through the admissions process.
- Students' ability to enhance their campus community and the educational experiences of their peers.
- Consideration of academic, nonacademic, and contextual factors that highlight the accomplishments and potential contributions of each applicant through consideration of their background and circumstances.

In such a process, student applications should be considered through an equitable lens on persistence, talent, and ingenuity reflected through leadership in the opportunities available where students' live and learn.

Higher education institutions should also provide training to admissions faculty and staff to ensure their review practices are aligned with the institution's mission of increasing racial equity and diversity. Research suggests that when admissions staff use holistic review practices and are informed with greater background information on applicants, they are more likely to admit students from lower socioeconomic backgrounds.<sup>78</sup> Learning opportunities for staff could include information about: holistic review practices, inequities reflected through standardized test scores, methods to mitigate implicit bias that may influence decision-making, the importance of diversity in higher education, the requirements of civil rights laws, and cultural competence to better serve the expansion of their campus community.



# 20

## Make data about athletics admissions transparent.

### Here's what the federal government can do:

- The U.S. Department of Education should collect and disseminate disaggregated data on athletics admissions preferences.
- The U.S. Department of Education should conduct and disseminate research into the use of athletics recruiting and preferences and their effects on the racial diversity of colleges and universities.

### Here's what state government can do:

- State legislatures and higher education coordinating agencies should require colleges and universities to report athletics recruitment and admissions data in an easily accessible and publicly available manner.

### Here's what institutional leaders can do:

- Higher education institutions should evaluate the degree to which athletics preferences undermine or contribute to campus diversity.

Data from the U.S. Department of Education's Equity in Athletics database show that the majority of all student athletes are white and that the share of white student athletes is even higher for Ivy League and other elite, hyper-selective institutions.<sup>79</sup> A 2003 book found that recruited athletes at academically selective colleges and universities are as much as four times more likely to gain admission than other applicants with similar

academic backgrounds.<sup>80</sup> Thorough review of this practice and its effects is urgently needed.<sup>81</sup> These data suggest that athletics preferences confer a benefit on white students and that more transparent data are needed to inform future decision-making.

## Conduct full-scale audit of admissions requirements.

# 21

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on the effects of admissions requirements, such as pre-coursework, on the racial diversity of admitted college students.
- The U.S. Department of Education should provide technical assistance and best practices for conducting full-scale audits of admissions requirements.

### Here's what state government can do:

- State legislatures should require higher education institutions to conduct a full-scale audit of admissions requirements.
- Higher education coordinating agencies should share best practices for conducting full-scale audits of admissions requirements.

### Here's what institutional leaders can do:

- Higher education institutions should conduct a full-scale audit of admissions requirements.

By conducting audits of admission requirements, institutions can ensure that their admissions processes are fair, transparent, and inclusive, allowing for the recognition of diverse talents and capabilities among all applicants.

Colleges and universities should conduct a comprehensive audit of admissions requirements to identify and rectify any instances where admissions criteria, such as pre-coursework, are not truly necessary and are limiting the racial diversity of the admitted students pool. High schools with a large share of Black, Latino, and Native American students are less likely to offer advanced courses.<sup>82</sup> For example, only 38 percent of high schools with predominantly Black or Latino student enrollment offer calculus.<sup>83</sup> Emphasizing advanced pre-coursework in admissions criteria disadvantages students from underrepresented backgrounds and perpetuates inequities in higher education access. For example, an institution might require an applicant to have taken calculus in high school for all majors, even those where previous calculus experience isn't necessary.

### Here's what institutional leaders can do:

- Higher education institutions should adopt test-optional policies in the admissions process.
- Higher education institutions should provide guidance to admissions officers about how voluntarily submitted test score data should be considered so as not to disadvantage those students who decline to share test scores.

In order to avoid trading one faulty measure for another, admissions officers should adopt holistic review practices and take into account multiple measures of academic readiness.

Since the COVID-19 pandemic, more than 1,700 colleges have shifted to adopting test-optional policies, allowing applicants to choose whether to submit SAT/ACT scores.<sup>84</sup> These policies take into consideration opportunity barriers, such as the cost and access associated with test preparation and advanced courses. A study on the University of California higher education system found that about one-third of the variance in students' SAT scores could be explained by race and socioeconomic factors, raising serious questions about its utility as a tool in measuring academic readiness.<sup>85</sup> The inclusion of SAT/ACT should be made optional to increase equity in the admissions process. The adoption of test-optional policies has resulted in a 10 to 12 percent increase in Black, Latino, and Native American students matriculated.<sup>86</sup>

# 22

## Adopt test-optional policies in admissions criteria.

### Here's what state government can do:

- State legislatures should require institutions to make testing criteria, such as the SAT/ACT, optional in their admissions process.





## 23 Provide transparency on how test scores are used in the admissions and financial aid process.<sup>87</sup>

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on test scores and their effect on the admissions and financial aid process.

### Here's what state government can do:

- State legislatures should require higher education institutions to provide transparency on how test scores are used in their admissions and financial aid process.
- State legislatures should require higher education institutions to collect and report data about the impact of test scores in admissions decisions.
- Higher education coordinating agencies should support data collection and reporting on the impact of test scores in admissions decisions.

### Here's what institutional leaders can do:

- Higher education institutions that continue to use test scores as required or optional admissions criteria should evaluate and assess how test scores are used in admissions decisions, including whether and how they contribute to racial equity or racial disparities.

- Higher education institutions should make information about how test scores are considered in holistic reviews available to prospective applicants.
- Higher education institutions should publicly share information on how and whether test scores are considered in financial aid opportunities.

Institutions of higher education that continue to use test scores as required or optional admissions criteria should provide transparency on how test scores are used in their admissions and financial aid processes. It is important that higher education institutions that have adopted test-optional policies monitor whether students who choose to include SAT/ACT test scores have an unfair advantage in the admissions process, thus undermining the intent of making the scores optional. This requires institutions to collect data, evaluate, and publicly report the relationship between test-taking, acceptance, and enrollment, as well as providing guidance to admissions staff about how scores (or the lack thereof) are to be considered. Reports should also include whether there are data trends on the likelihood of admittance related to whether or not a student chooses to submit their scores, disaggregated by race, ethnicity, gender, disability, and Pell participation. State legislatures that adopt test-optional policies should also require institutions to collect and report this data on a publicly available website.



# 24

## Contextualize application information to enable comparisons on unequal educational opportunity.

### Here's what the federal government can do:

- The U.S. Department of Education should make information available about unequal educational opportunity through tools such as the Civil Rights Data Collection and NCES surveys.
- The U.S. Department of Education Office for Civil Rights should provide guidance on how to lawfully consider unequal educational opportunity in the context of admissions decisions.

### Here's what institutional leaders can do:

- Higher education institutions should provide admissions officers with information about unequal educational opportunity to contribute to holistic reviews of student application.

Public and private institutions can enhance their admissions process by identifying tools that facilitate holistic review to better understand the context of an applicant's experiences.

Admission officers should build upon their ability to collect and meaningfully evaluate data that offer greater insights into their applicant pool. Admissions officers and enrollment managers can consider adopting tools that support holistic reviews within the context of the opportunities available to students where they live.<sup>88</sup> Information about

the barriers to success a student is likely to have confronted enables admissions officers to understand accomplishments in a different way. For students coming from communities with low graduation rates, limited access to STEM courses and advanced coursework, or few public libraries, this information could show the extraordinariness of an AP math score or their job at the local library.

## Consider barriers to participation in extracurricular activities.

# 25

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on barriers to participation in extracurriculars faced by historically underrepresented communities and students.
- Congress should provide funding to support out of school time enrichment for students in high poverty schools.

### Here's what state government can do:

- State legislatures should increase funding for students with lower incomes to access extended learning and extracurricular activities.

### Here's what institutional leaders can do:

- Public and private institutions should audit their admissions criteria to include consideration of barriers to participation in extracurricular activities.

While participation in extracurricular activities can demonstrate a student's leadership skills, intellectual curiosity, and other attributes that would be valuable to a student body, these opportunities are not equitably available to all students — and the way they are considered in an application process may disadvantage students from marginalized backgrounds who possess the same talents. For example, a study of two North Carolina high schools found that the higher the number of eligible students qualifying for free or reduced lunch, the less access students had to extracurriculars such as academic honor societies, service opportunities, and sports activities.<sup>89</sup> Even when opportunities are available, students from lower income households may need to work after school instead of participating in enrichment activities, unpaid internships, or volunteer work. Around 20.3 percent of teenagers between the ages of 16 and 19 were employed in 2022, an increase of 2.7 percent since 2020.<sup>90</sup> Public and private institutions should take into consideration barriers to participation in extracurriculars experienced by historically underrepresented students, such as financial resources and after-school employment.

# 26

**Limit the maximum number of extracurriculars and letters of recommendation reviewed and listed in college applications.**

#### **Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research about the ways that students spend time outside of school hours and how those experiences lead to readiness for or create barriers to higher education.

#### **Here's what institutional leaders can do:**

- Higher education institutions should limit the maximum number of extracurricular activities and letters of recommendation that they will review in the admissions process.

Public and private higher education institutions should reduce the number of extracurriculars and letters of recommendations they will review in the admissions process in light of differences in the availability of extracurricular opportunities and barriers to college advising.<sup>91</sup>

While extracurricular activities and letters of recommendation can contribute to a holistic understanding of a student's unique talents and gifts, allowing students to include unlimited examples creates a disadvantage for students with fewer options and inadequate access to college advising and extracurriculars.

Considering these barriers, reducing the number of extracurriculars reviewed in the admissions process may offer greater equity in admissions for students who often are excluded from being able to participate in such activities. A review of 5.9 million Common App applications, shared with more than 800 institutions, found that white applicants reported an average of 63 percent more athletic, academic, and art activities than Black applicants. This study also found that continuing-generation applicants reported participation in 71 percent more activities than first-generation applicants.<sup>92</sup> In addition, students at schools without guidance counselors who have received professional development in college and career advising may be limited in their access to strong letters of recommendation. Nearly a third of high school counselors have also reported that they did not receive any training in graduate school about the college admissions process, and an additional 32 percent believe the training they did receive was inadequate.<sup>93</sup>



# 27

## Consider the value of after-school employment in the admissions process.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research about how after-school employment leads to readiness for or creates barriers to higher education.

### Here's what institutional leaders can do:

- Higher education institutions should audit their admissions criteria to include consideration of an applicants' participation in after-school employment. Higher education institutions should provide professional development learning opportunities to their admissions staff and faculty for this purpose.
- Institutions should make explicit the value of pre-college employment to college readiness and encourage students to share how they benefited from those experiences.

Students who participate in after-school employment likely develop many skills that contribute to their success in higher education, including responsibility, leadership, attention to detail, and the ability to work collaboratively. Admissions staff and faculty should take into account the benefits accrued to students through these experiences when making their decisions. In addition, admissions offices should refrain from prioritizing employment that may reflect socioeconomic biases, such as internships secured through social capital, over minimum-wage labor.

# 28

## Consider the value of caregiving in the admissions process.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research about the ways that caregiving for a sibling, parent, or other relative can lead to readiness for or create barriers to higher education for students.
- The U.S. Department of Education should share updated best practices to support the academic success of pregnant and parenting students and protect pregnant and parenting students from discrimination in high school.
- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of Title IX guidance on protections for pregnant and parenting students.

### Here's what institutional leaders can do:

- Higher education institutions should audit their admissions criteria to include consideration of caregiving responsibilities. Higher education institutions should provide professional development learning opportunities to their admissions staff and faculty for this purpose.
- Higher education institutions should ensure that information about Title IX protections and campus support services for pregnant and parenting students are shared in recruitment materials, catalogs, student handbooks, and on public websites.





- Institutions should encourage students to share information in their applications about caregiving responsibilities they have had and how those experiences contributed to their readiness for higher education.

Students with significant responsibility to care for a sibling, parent, child, or other relative are also demonstrating vital skills that will help them to be successful and will contribute to the overall college experience. According to the National Center for Education Statistics, nearly one-fifth of all college students are parents.<sup>94</sup> Women of color are more likely than other college students to be parents, with 47 percent of Black women, 39.4 percent of Native American women, and 31.6 percent of Latinas identifying as student parents.<sup>95</sup> Weighing the significance of activities such as caregiving responsibilities of parenting students and students from multi-generational households may have the opportunity to create more equitable admissions for today's students.

*Students must have the power to make their own decisions about reproduction, including matters associated with contraceptive use, pregnancy, and childbearing. For more information and resources, visit the [National Women's Law Center](#).*

# 29

## Make admissions decisions need-preferring.

### Here's what the federal government can do:

- Congress should pass legislation that would award grants to higher education institutions that make admissions decisions need-preferring.

### Here's what state government can do:

- State legislatures should provide funding to higher education institutions that make admissions decisions need-preferring.

### Here's what institutional leaders can do:

- Higher education institutions should make admissions decisions need-preferring.
- Higher education institutions should ask students for information about their household income, making clear that financial need is considered a "plus-factor" in admissions.
- Higher education institutions should ensure that information about need-preferring admissions is shared in recruitment materials, catalogs, student handbooks, and on publicly available websites.

Instead of "need-blind,"<sup>96</sup> where admissions decisions are made without considering a student's likelihood of relying on financial aid, or "need-aware," where a student's ability to pay tuition without financial aid is considered a "plus factor," "need-preferring" admissions recognizes the benefits of a socioeconomically diverse campus and considers financial need to be a "plus factor." In addition to preferring applicants with financial need, institutions should also structure financial aid processes to meet the full need of all admitted students. In order to engage in "need-preferring" admissions, institutions should ask for household financial information from applicants.



# 30

## Remove from consideration evidence of “demonstrated interest.”

### Here’s what institutional leaders can do:

- Higher education institutions should remove from their admissions process the practice of “demonstrated interest.”

### As an interim measure:

- Higher education institutions should define allowable “demonstrated interest” criteria and refrain from including criteria that not all students can access due to financial barriers such as campus tours, summer programs, etc.
- Higher education institutions should provide transparency about “demonstrated interest” criteria in their admissions process.
- Higher education institutions should ensure that information about their “demonstrated interest” criteria is shared in recruitment materials, catalogs, student handbooks, and on publicly available admissions websites.

Instead of relying on opaque criteria that are unrelated to college readiness, institutions should base admissions decisions on transparent measures and criteria that all students understand and have access to.

Since 2003, the number of selective institutions that perceive “demonstrated interest” as a considerably or moderately important factor in their admissions criteria has increased by 7 percent.<sup>97</sup> “Demonstrated

interest” factors are those that an institution perceives as indicating an applicant’s individual enthusiasm for attending a particular institution, such as attending a campus tour, contacting a regional admissions officer, or opening advertising emails from the institution. Reliance on such criteria contributes to the opaque process of college admissions that rely on specialized knowledge of the process.<sup>98</sup> Some institutions currently reward applicants who show “demonstrated interest” by increasing the applicant’s likelihood of acceptance. In a study at a medium-sized private higher education institution, it was found that “demonstrated interest” offered a 20 percent higher chance of admittance.<sup>99</sup> Considering barriers in access to college counseling faced by historically underrepresented students, many may not be aware of the weight that “demonstrated interest” carries in the admissions process, especially at highly selective institutions.

## Study admissions and enrollment policies and practices To identify barriers and elevate strategies to achieve equity and diversity in the student body.

# 31

### Here’s what the federal government can do:

- Congress should fund research on policies and practices that contribute to or hinder equitable college admissions and enrollment.
- The U.S. Department of Education should report research findings on policies and practices that contribute to or hinder equitable college admissions and enrollment.



- The U.S. Department of Education should offer recommendations regarding existing or future legislation on policies and practices that contribute to or hinder equitable college admissions and enrollment.
- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of best practices to advance diversity and inclusion in higher education.

#### Here's what institutional leaders can do:

- Higher education institutions and associations should conduct and disseminate research about admissions criteria, policies, and practices to evaluate bias, inform indicators of future success, and facilitate diverse student bodies across multiple lines of student characteristics.
- Higher education institutions should review research about admissions and enrollment policies and practices and apply those strategies with evidence of increasing diversity and equity.

The federal government should fund and study strategies that address wealth and racial disparities in admissions, enrollment, and college completion in order to build stronger policies to achieve racial equity in higher education. The U.S. Department of Education should provide Congress with recommendations to address inequities that exist within the higher education system, particularly those experienced by students of color, first-generation students, and historically underrepresented students. The U.S. Department of Education released related information in 2023 on strategies to advance diversity and inclusion in higher education.<sup>100</sup>

Colleges and universities themselves, and their associations, should contribute to the body of knowledge about admissions and enrollment to ensure equity and diversity.

**Provide pathways to admissions and completion, regardless of the immigration status of students or their parents or guardians.<sup>101</sup>**

**32**

#### Here's what the federal government can do:

- Congress should ensure that school districts and federal, state, and local governments preserve and protect the rights of K-12 students established under *Plyler v. Doe*.<sup>102</sup>
- Congress should pass permanent protections with a pathway to citizenship for immigrant youth, including Deferred Action for Childhood Arrivals (DACA) recipients, DACA-eligible individuals, and undocumented youth who may not be eligible for DACA.
- The U.S. Department of Education should investigate complaints of discrimination based on immigration status in college admissions.
- The U.S. Department of Education should share best practices to provide pathways to higher education, regardless of immigration status with higher education institutions.
- Congress should ensure federal student aid is accessible to students who meet residency requirements that aren't tied to immigration status.



### Here's what state government can do:

- State legislatures should ensure that higher education institutions use and disclose personal information about students', parents', and family members' immigration statuses only for the purposes of administering educational or financial aid programs or assisting students.
- Higher education coordinating agencies should ensure that higher education institutions are providing pathways to admission, regardless of immigration status or immigration status of parents and guardians.
- State legislatures and higher education coordinating agencies should make determinations about in-state eligibility without regard to immigration status.

### Here's what institutional leaders can do:

- Higher education institutions should ensure that students, their parents, and guardians have access to and an understanding of best practices in the admissions process, regardless of their immigration status or their primary language.
- Higher education institutions should ensure that personal information about students', parents', and family members' immigration status is used and disclosed only for the purpose of administering educational or financial aid programs, or otherwise assisting students.
- Higher education institutions should establish protocols and measures to protect immigrant students on campus and refrain from disclosing personal information about students to Immigration and Customs Enforcement (ICE) and Border Patrol.

- Higher education institutions should provide free and confidential legal immigration support for students on campus.

Students should not be denied access to higher education at public or private institutions on the basis of their immigration status or that of their parents and guardians. This includes discrimination by states, boards of governors, state departments of education, public and private institutions, admissions officers, and other higher education officials who shape college admissions and in-state residency decisions. Approximately 98,000 undocumented students graduate from high schools in the United States every year.<sup>103</sup> Federal, state, and institutional policymakers should ensure that all students have a pathway to admissions in higher education, regardless of immigration status.

**Support formerly incarcerated and justice-impacted students in admissions through college completion.**

**33**

### Here's what the federal government can do:

- The U.S. Department of Education should share best practices for higher education institutions to remove criminal history questions from their admissions process.
- The U.S. Department of Education should collect, conduct, and disseminate research on the percentage of applicants denied admissions based on reported criminal history, whether as a child or adult.

- The U.S. Department of Education should ensure that higher education institutions and departments of corrections have access to and an understanding of best practices to support justice-impacted students.

#### **Here's what state government can do:**

- State legislatures should require higher education institutions to remove criminal history questions from their admissions process.
- States legislatures should provide justice-impacted individuals access to state financial aid programs.
- State legislatures should provide funding to higher education institutions to develop an academic support program to serve formerly incarcerated students and justice impacted students.

#### **Here's what institutional leaders can do:**

- Higher education institutions should remove criminal history questions in their admissions process.
- Higher education institutions and departments of corrections should ensure that justice-impacted students have access to support services that help them apply for financial aid and understand the admissions and enrollment process.
- Higher education institutions should provide technology and internet access for justice-impacted students who are incarcerated.

- Higher education institutions should ensure that justice-impacted students have access to campus support services such as wellness, housing, and food security programs.
- Higher education institutions should build advisory boards dedicated to support for justice-impacted students.

It is critical for policymakers to invest in higher education pathways for formerly incarcerated and justice-impacted individuals. Many justice-impacted people are first-generation students, parents, students with disabilities, students of color, and/or students with lower incomes.<sup>104</sup> In 2020, the Common Application, used by more than 900 colleges, removed questions about criminal history.<sup>105</sup> All higher education institutions, including those who do not use the Common Application, should remove questions about criminal history from their admissions process.

In July 2023, 760,000 students who were incarcerated became eligible for Pell Grants to support their participation in prison education programs (PEPs).<sup>106</sup> However, many states continue to exclude students impacted by the criminal-legal system from accessing financial aid. In 2020, students impacted by the criminal-legal system were considered ineligible for 54 of the 100 largest state aid programs.<sup>107</sup> The U.S. Department of Education released related information in 2023 on strategies to support students impacted by the criminal-legal system.<sup>108</sup>



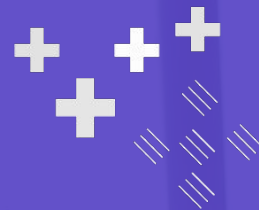
Higher education institutions should support justice-impacted students beyond financial aid and offer opportunities to obtain meaningful higher education, such as academic advising, mental health counseling, or job placement programs. The [Berkley Underground Scholars](#) (BUS) program was started in Spring 2013 by formerly incarcerated and justice-impacted students at UC Berkeley. The program has received state and institutional funding to have a dedicated office space and to hire staff, including transfer coordinators and formerly incarcerated students.



**Black and Latinx people are overrepresented at every stage of the criminal-legal system from racially biased policing practices, including over-surveillance and harsher sentencing outcomes than white individuals for similar conduct. For example, young Black men between 18 and 19 years of age are 12 times more likely to be imprisoned than white men of the same age, and Black women are imprisoned at twice the rate of white women.<sup>109</sup> The overrepresentation of Black people in the criminal-legal system is not explained by racial differences in**

**participation in criminalized behavior, but rather by structural discrimination and racism at the root of the criminal-legal system.<sup>110</sup> For example, while Black and Latinx people use drugs at similar rates as other people,<sup>111</sup> nearly 80 percent of people in federal prison and almost 60 percent of people in state prison for drug offenses are Black or Latinx<sup>112</sup> while making up only 31 percent of the population.<sup>113</sup> There are nearly 2.3 million justice-impacted individuals in jails, prisons, and detention centers across the United States.<sup>114</sup>**

*For more information on community-centered investments and public safety, see [Vision For Justice](#).*



# Finance

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# FINANCE

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**Opportunities in postsecondary education can lead to significant social and economic benefits for individual students, states, and society as a whole. However, students of color face a litany of institutional and societal barriers to accessing and completing a postsecondary education, including affordability.** When public universities face budget cuts, they often reduce spending on student support services, increase tuition, and harm student access and completion rates, especially among Black and Hispanic students.<sup>115</sup> Eliminating barriers to affordability and advancing racial equity in higher education requires intentional and dedicated policy solutions to bridge resource constraints faced by students with lower incomes as well as public institutions that serve higher proportions of traditionally underrepresented students (including community colleges, Historically Black Colleges and Universities (HBCUs), Tribal Colleges and Universities (TCUs), and Minority Serving Institutions (MSIs). Implementing equity centered funding policies can help make college affordable for all.

→ Congress should identify metrics for evaluating whether higher education institutions are adequately and equitably funded by states.

**Here's what state government can do:**

- State legislatures should identify metrics for evaluating whether two- and four-year public colleges and universities are adequately and equitably funded in their states.
- State legislatures should provide adequate and equitable state funding to public colleges and universities, limit state cuts to higher education, and reinvest in their public higher education systems in order to receive additional federal funds.
- State legislatures should establish consistent funding formulas to support public higher education institutions by considering enrollment rates and accounting for inflation.

Higher education serves as a catalyst to build a skilled workforce, drive innovation, and foster economic growth. Robust investment in higher education is essential for a student's individual success and also for the prosperity of their communities. When states sacrifice funding for public higher education institutions, they can disproportionately harm underserved students and their communities. State funding for higher education has not kept up, and over the last decade, 32 states saw a \$1,500 average decline in spending per student — resulting in increased out-of-pocket costs and borrowing for college students.<sup>116</sup> When public universities face funding cuts, they often reduce spending for support services and increase tuition, resulting in

**34 Re-invest in higher education and limit funding cuts.**

**Here's what the federal government can do:**

- Congress should fund institutions of higher education both directly and through federal student aid.
- Congress should structure federal funding for higher education to incentivize increased state investments.



greater barriers to graduation for Black and Latino students.<sup>117</sup> Decreases in state funding have been linked to lower graduation rates at four-year colleges and universities.<sup>118</sup> Congress and state legislatures should reverse funding cuts in higher education and deepen their investments, which will reap gains in economic growth and mobility. In addition to ensuring core funding is maintained or increased, even in times of economic downturn, Congress should provide targeted institutional funding<sup>119</sup> to incentivize and reinforce equitable practices by colleges and universities.

#### Here's what institutional leaders can do:

- Higher education institutions should use federal and state funds on student services that support enrollment and completion, including creating or expanding existing emergency aid programs.
- Higher education institutions should make emergency aid programs abundant, accessible, and free of stress and stigma.

Emergency grant aid provides students with security when they may need it most, such as transportation to attend classes, a safe place to sleep, or access to nutritional meals. A majority of colleges and universities — about 70 percent — across the United States have already considered the benefits of emergency grant aid and offer emergency funds that support students through unexpected costs.<sup>120</sup> In 2022, students spent emergency funding to cover tuition, textbooks, and housing and to pay for expenses that helped them to stay in school such as childcare, transportation, food, and health care.<sup>121</sup>

# 35

## Establish emergency grant aid to provide greater support for students through graduation.

#### Here's what the federal government can do:

- Congress should appropriate funding for basic needs grants for higher education institutions to provide emergency funds to students for housing, food, transportation, and access to health care services.
- The U.S. Department of Education should collect, conduct, and disseminate research on the use of emergency funds for students in higher education and their effectiveness in supporting students through graduation.

#### Here's what state government can do:

- Governors and state legislatures should increase funding for higher education in their annual budgets and appropriations, including to support state attainment goals, operational spending at higher education institutions, tuition assistance and financial aid, and student housing, food, transportation, and health care needs.

## Increase funding for the Office of Federal Student Aid.

# 36

#### Here's what the federal government can do:

- Congress should increase funding for the Office of Federal Student Aid.

Congress should increase funding for the Office of Federal Student Aid (FSA) to better serve all students. To better fulfill its mission, FSA requires increased funding and investments to build stronger systems, provide borrower support, and ensure that their infrastructure can meet the demands of today's students.



The federal government contributes to higher education mostly through financial aid, such as Pell Grants awarded directly to students. This aid is administered by FSA, which also provides information to families about how to apply for aid and assistance throughout the financial aid process. However, the agency's ability to serve college students is in peril due to years of stagnant funding, as most recently shown by the poorly executed rollout of the Free Application for Federal Student Aid (FAFSA), which has complicated the pursuit of college and posed significant barriers to students and their families.<sup>122</sup> Consequently, millions of students and families are struggling to navigate and engage with the higher education system.



## Provide transparent and consistent information about financial aid offers.

# 37

### Here's what state government can do:

- State legislatures should require that all institutions of higher education in their state adopt standard definitions for their financial aid offer letters.

### Here's what institutional leaders can do:

- Higher education institutions should ensure that financial aid offer letters are transparent and include information, such as:
  - ◆ Itemized cost of attendance
  - ◆ Explanation of all types of financial aid, including grants, scholarships, student loans, and student employment
  - ◆ Explanation of the terms and conditions on student loans as well as how much the debt will cost over time
  - ◆ Estimated net price<sup>123</sup>
  - ◆ Whether the financial aid is offered once, on an ongoing basis, or renewable
  - ◆ Next steps for accepting or declining the financial aid offer

Higher education institutions should provide students with transparent and comparable information about their financial aid offers.



Prospective and current college students, as well as their families, deserve support and transparency throughout the financial aid process. In 2022, the U.S. Government Accountability Office released a report with best practices to improve information on college costs and recommended that Congress consider legislation to require institutions of higher education to provide students with standardized information in their financial aid offers. According to the report, 41 percent of colleges do not include a net price in their financial aid offer letter, which may leave students to guess their cost of attendance. Furthermore, 50 percent of colleges are understating their net price.<sup>124</sup>

fallen.<sup>125</sup> Congress should create new federal-state partnerships that equitably invest in publicly funded colleges and better equip states to support public higher education. Federal-state partnerships should prioritize the goals of increasing educational quality, reducing student expenses, lifting barriers to degree attainment, stabilizing state funding through economic downturns, and providing support services and programs to help more students reach graduation.

# 38

## Provide additional federal funding to state institutions of higher education in ways that incentivize additional state investments.

### Here's what the federal government can do:

- Congress should provide federal funding for state institutions of higher education with state match, maintenance of effort (MOE), and supplement not supplant (SNS) requirements.
- Congress should provide stable funding and increased support to states during economic downturns.

A major driver contributing to the rising cost of college and student debt is state disinvestment in higher education. While 77 percent of college students attend public higher education institutions, state support has

## Invest in and support institutions that serve higher proportions of traditionally underrepresented students.

# 39

### Here's what the federal government can do:

- Congress should expand mandatory funding for Historically Black Colleges and Universities (HBCUs), Tribal Colleges and Universities (TCUs), and Minority Serving Institutions (MSIs).
- Congress should increase discretionary funding dedicated to HBCUs, TCUs, and MSIs.
- Congress should appropriate funding for the improvement of campus facilities at HBCUs and TCUs.
- Congress should provide greater funding for infrastructure and the improvement of campus facilities at HBCUs. Congress should request a Government Accountability Office report to study the implementation of such programs.

- Congress should ensure that MSIs continue to have separate and robust programs and funding streams.
- The U.S. Department of Education should conduct outreach and provide technical assistance to HBCUs, TCUs, and MSIs so that institutions are provided with an understanding of guidance to apply for federal funding programs.
- Federal agencies should ensure that outreach, opportunities for institutional/community engagement, and technical assistance are provided prior to and throughout the grant award making process.
- Agencies should further track how many grants are awarded to HBCUs, TCUs, and MSIs.

**Here’s what state government can do:**

- State legislatures should increase funding dedicated to HBCUs.

Federal programs providing institutional aid to colleges and universities that serve traditionally underrepresented students began when the Higher Education Act of 1965 was signed into law.<sup>126</sup> Titles III and V of the [Higher Education Act](#) (HEA) grants funding based on criteria such as core expenses, number of students on campus receiving need-based aid, and enrollment of traditionally underrepresented students. HBCUs were the first institutions to be designated eligible for these grants in the Higher Education

Amendments of 1986, followed by the designation of Tribally Controlled Community Colleges in 1992, which evolved into TCUs. HBCUs and TCUs do not need to apply for eligibility designation annually.<sup>127</sup> Except for TCUs and HBCUs, institutions that qualify for these funding programs are known as Minority-Serving Institutions (MSIs). MSIs include Hispanic Serving Institutions (HSIs), Asian American and Native American Pacific Islander Serving Institutions (AANAPISIs), Predominantly Black Institutions (PBIs), Native American Serving Nontribal Institutions (NASNTIs), and Alaska Native and Native Hawaiian Serving Institutions (ANNHs).

Policies to fund higher education institutions must acknowledge the role of HBCUs, TCUs, and MSIs in serving traditionally underrepresented students. These institutions frequently enroll higher percentages of Pell recipients compared to other institutions, showcasing the crucial educational opportunities they provide.<sup>128</sup> Despite their severe underfunding, these institutions continue to serve as the primary engines of upward socioeconomic mobility for traditionally underrepresented students.<sup>129</sup> Across all institution types, four-year HBCUs, TCUs, and MSIs propel more students from the lowest income quintile to the top income quintile than institutions outside of these categories.<sup>130</sup> Without protecting the future viability of these institutions through targeted financial and resource investment, the national postsecondary system stands at risk of failing traditionally underrepresented students seeking access to educational opportunities.

- **Alaska Native and Native Hawaiian-Serving Institutions (ANNHs):** Alaska Native-serving institutions enroll at least 20 percent Alaska Native undergraduate students. Native Hawaiian-serving institutions enroll at least 10 percent Native Hawaiian undergraduate students.<sup>131</sup> In 2023, there were 16 ANNHs.<sup>132</sup>
- **Asian American and Native American Pacific Islander-Serving Institutions (AANAPISIs):** AANAPISIs are institutions where at least 10 percent of undergraduate students are Asian American or Native American Pacific Islander. In 2023, there were 200 AANAPISIs.<sup>133</sup>
- **Hispanic Serving Institutions (HSIs):** HSIs are institutions where at least 25 percent of full-time undergraduate students are Hispanic.<sup>134</sup> In 2023, there were 541 HSIs serving more than 2 million Hispanic students.<sup>135</sup>
- **Historically Black Colleges and Universities (HBCUs):** HBCUs have been central to the American story of social and economic opportunities provided through education. The establishment of the first HBCU, Cheyney University, dates back to 1837 during a time when Black students were denied access to higher education institutions through legalized discrimination. Since their establishment, HBCUs have facilitated the creation of a Black middle class, strengthened the civil rights movement, and empowered prominent Black Americans to rise in leadership. HBCUs comprise 3 percent of colleges and universities and enroll 16 percent of all Black students in higher education.<sup>136</sup> Today there are 103 HBCUs serving more than 289,000 students.<sup>137</sup>
- **Native American-Serving, Nontribal Institutions (NASNTIs):** NASNTIs are institutions that are not affiliated with American Indian and Native Alaskan tribes, but where at least 10 percent of undergraduate students are Native American. In 2023, there were 18 NASNTIs.<sup>138</sup>
- **Predominantly Black Institutions (PBIs):** PBIs are institutions where at least 40 percent of undergraduate students are Black and where at least 50 percent of undergraduates are students with lower incomes or first-generation college students.<sup>139</sup>
- **Tribal Colleges and Universities (TCUs):** TCUs were created to support tribal nation-building following the cultural and economic impact of colonization on generations of Native peoples and their communities.<sup>140</sup> TCUs serve a critical role by actively revitalizing Native languages and culture, promoting tribal sovereignty, providing educational opportunities, and building economic growth. Today, there are 37 TCUs, enrolling more than 30,000 full- and part-time students, throughout Native Country.<sup>141</sup> TCUs are located mostly in the Midwest and Southwest regions and can vary from rural reservations to urban locations, woodlands, deserts, and tundra. Despite their significance in higher education, TCUs remain underfunded. In most states, TCUs do not receive state tax financial support and rely primarily on federal funding.<sup>142</sup>

**"At a time when many schools barred their doors to Black Americans, these colleges [HBCUs] offered the best, and often the only, opportunity for a higher education."**

—President George H.W. Bush  
April 28, 1989

## **40** Design equity-driven free college programs.

### **Here's what the federal government can do:**

- Congress should provide matching funds for state-run, equity-driven free college programs that include components such as:
  - ◆ Covering the full cost of attendance for students with lower incomes, including tuition, fees, living expenses, and financial safety net packages with allowable uses for books, course learning materials, and transfer withholdings.
  - ◆ Covering at least tuition for all students attending public colleges and universities.

- ◆ Including four-year colleges and universities, HBCUs, and TCUs.
- ◆ Providing aid to support students earning bachelor's degrees.
- ◆ Eliminating criteria for financial aid that limit eligibility for part-time students, adult students, students who do not meet satisfactory grade point average (GPA) requirements (typically a 2.0), and students who need to take time off to pursue workforce opportunities.
- ◆ Allowing for aid to remain as grants and not converted to loans requiring repayment.

- Congress should request a GAO report to evaluate the effectiveness of free college aid programs and their impact on equity in enrollment and graduation of students with lower incomes and students of color.

### **Here's what state government can do:**

- State legislatures should design equity-driven free college programs that include components, such as:
  - ◆ Covering the full cost of attendance for students with lower incomes, including tuition, fees, living expenses, and financial safety net packages with allowable uses for books, course learning materials, and transfer withholdings.
  - ◆ Covering at least tuition for all students attending public colleges and universities.
  - ◆ Including four-year colleges and universities, HBCUs, and TCUs.



- ◆ Providing aid to support students earning bachelor's degrees.
- ◆ Eliminating eligibility criteria that limits part-time students, adult students, students who do not meet satisfactory grade point average (GPA) requirements (typically a 2.0), and students who need to leave to pursue workforce opportunities.
- ◆ Allowing for aid to remain as grants and not converted to loans requiring repayment.
- ◆ Ensuring eligibility regardless of immigration status and students impacted by the criminal-legal system.

**Here's what institutional leaders can do:**

- Higher education institutions should cover the cost of tuition on a "first-dollar" basis, where award levels are not reduced because of a student receiving other grant aid. Through a first-dollar approach, grants could be used by students for living expenses.
- Higher education institutions should expand student support programs, build institutional capacity, and strengthen transfer agreements.

Policies to design free college programs should center equity, opportunity, and success for the students impacted most by the affordability crisis, particularly students with lower incomes and students of color. Free college is not a standalone solution and is one of many components that lead to a strong commitment and investment to increase opportunity for all students. Free college, when coupled with support services such as academic coaching, improves retention and

student outcomes better than free college alone.<sup>143</sup> Centering equity in the design of free college policies offers states the opportunity to make college affordable once again and increase access to higher education.

**Make all state aid need-based.**

**41**

**Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate data on financial aid awards and scholarships that do not account for student financial need.

**Here's what state government can do:**

- State legislatures should require higher education institutions to prioritize aid granted based on financial need, rather than so-called merit.

**Here's what institutional leaders can do:**

- Higher education institutions should prioritize aid granted based on financial need, rather than so-called merit.
- Higher education institutions should ensure that students with lower incomes have access to need-based scholarships.

Students of all income backgrounds should be able to access opportunities to succeed in higher education. Increasing funding for need-based aid, grants, and scholarships would help students with lower incomes to cover tuition, fees, and additional expenses that support them to stay in school. Research shows that Pell-eligible students, first-generation students, and students of color who receive scholarships have a 10 to 12 percent higher likelihood of graduating compared to their peers who do not.<sup>144</sup>



# 42

## Provide scholarships and grants regardless of immigration status.

### Here's what the federal government can do:

- Congress should repeal the restrictions on immigrant eligibility for education benefits.
- Congress should enact legislation that provides opportunities for scholarships and grants regardless of immigration status and prohibits denial of financial aid, including Pell and other grants, on the basis of immigration status.
- The Office of Federal Student Aid should ensure that mixed-status families have access to and an understanding of how to complete the Free Application for Federal Student Aid (FAFSA) in their primary language.

### Here's what state government can do:

- State legislatures should ensure students are eligible for state and institutional aid regardless of their immigration status.
- State legislatures should ensure that state aid applications are available in languages other than English, especially those most spoken in their state.
- State legislatures should launch campaigns to inform students, families, and higher education institutions about scholarships and grants available regardless of immigration status. State legislatures should ensure these campaigns are accessible in languages other than English.

- Higher education coordinating agencies should provide guidance to colleges and universities to ensure that they are offering access to scholarships regardless of immigration status.

### Here's what institutional leaders can do:

- Higher education institutions should ensure that students and their parents and guardians have access to and an understanding of guidance on scholarships and grants, regardless of their immigration status or their primary language.
- Higher education institutions should ensure that information about the immigration status of students, parents, and family members is used and disclosed only for the purpose of administering educational or financial aid programs, or otherwise assisting students.

Congress and state legislatures should provide greater financial aid support to students, regardless of their immigration status or that of their parents and guardians. Undocumented students, including Deferred Action for Childhood Arrivals (DACA) recipients, are not currently eligible for federal student aid. State aid programs, such as the [Colorado Application for State Financial Aid](#), provide critical support for students without consideration of their immigration status. Expansion of federal or state aid should be coupled with the elimination of the immigrant eligibility restrictions on access to higher education in the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) and the Illegal Immigration Reform and Immigration Responsibility Act (IIRIRA).<sup>145</sup>





# 43

## Prohibit discrimination on the basis of immigration status in determinations of in-state residency.

### Here's what the federal government can do:

- Congress should prohibit the consideration of immigration status when determining in-state status for students.
- The U.S. Department of Education should provide guidance to higher education institutions on the application of nondiscrimination law in determinations of in-state status.

### Here's what state government can do:

- State legislatures should set residency criteria that allow students to qualify for in-state tuition rates regardless of immigration status.
- State legislatures should launch statewide campaigns that communicate to students and their families that they qualify for in-state tuition rates regardless of immigration status. State legislatures should ensure these campaigns are accessible in languages other than English.
- Higher education coordinating agencies should provide guidance to colleges and universities to prohibit discrimination in determinations of in-state residency on the basis of immigration status.

### Here's what institutional leaders can do:

- Higher education institutions should make determinations about in-state status without regard to immigration status.
- Higher education institutions should establish policies that protect the privacy of students' immigration status when applying for scholarships and grants.
- Higher education institutions should launch campaigns to inform students and their families about residency criteria that allow students to qualify for in-state tuition rates regardless of immigration status. Institutions should ensure these campaigns are accessible in languages other than English.

Congress must prohibit discrimination on the basis of immigration status in determinations about in-state residency.

It is essential that immigrant students and students with immigrant parents are granted access to in-state tuition. Congress should ensure students who are undocumented are eligible for postsecondary education benefits.<sup>146</sup> Differences in tuition rates based solely on immigration status, even when students meet all other criteria for state residence, is a xenophobic and discriminatory practice that unjustly impedes pathways to higher education. These practices have no place in the higher education system.

# 44

## Increase the value of Pell Grants.

### Here's what the federal government can do:

- Congress should increase the value of Pell Grants to cover at least half the cost of attending a four-year public college or university.
- Congress should permanently restore automatic annual inflation adjustments for Pell Grants.
- Congress should make Pell Grants a mandatory funding program.
- Congress should expand Pell Grant eligibility to non-citizen students, undocumented students, DACA-eligible students, and TPS-eligible students.
- Congress should end the taxation of Pell Grants.

### Here's what state government can do:

- State legislatures should ensure Pell Grant increases supplement and do not supplant state grant aid.

### Here's what institutional leaders can do:

- Higher education institutions should ensure that increases to Pell Grants supplement and do not supplant institutional aid.

Pell Grants have a history of bipartisan support, and since 1972 they have provided financial aid to more than 80 million students with low-to-moderate incomes to help them reach their educational goals.<sup>147</sup> However, Pell Grants now cover the lowest share of college costs since their establishment. At its peak in 1975-76, the maximum Pell Grant covered

more than 75 percent of the average cost of attending a four-year public college, compared to the 2023-24 maximum award amount, which covers just 26 percent of the cost.<sup>148</sup> Congress should increase the value of Pell Grants and invest in the opportunity that they offer to students with fewer financial resources.

**6 million+** students

annually depend on Pell Grants to attend and complete college.<sup>149</sup> Of Pell recipients,

**88%** come from families with incomes at or below \$40,000,

**46%** come from families with incomes at or below \$15,000<sup>150</sup>

Pell Grants are particularly important for students of color.

- **60%** of Black students,
- **50%** of Hispanic or Latino students,
- **45%** of American Indian or Alaska Native students, and nearly
- **40%** of Native Hawaiian and Pacific Islander students

rely on Pell Grants to attend and complete college.<sup>151</sup>

Nearly 7 out of 10 Pell Grant recipients who graduate from four-year colleges have student loans, and their average debt is \$2,069 more than non-Pell graduates.<sup>152</sup>

# 45

**Ensure college students have access to public benefits, such as SNAP, TANF, WIC, Section 8, and Medicaid.**

## Here's what the federal government can do:

- Congress should expand eligibility and access for students with lower incomes to public benefits, such as [Temporary Assistance for Needy Families](#) (TANF), the [Women, Infants, and Children](#) (WIC) program, [Supplemental Nutrition Assistance Program](#) (SNAP), [Section 8](#), and [Medicaid](#).
- Congress should allow enrollment in higher education to meet work participation, compliance, and activity requirements of public benefits programs. Congress should remove mandates in SNAP and TANF programs that students must combine work with education, meet time restrictions, and enroll in certain degree and certificate programs.
- The U.S. Department of Education should collect, conduct, and disseminate data on the basic needs of college students, including their access to and usage of public benefits programs such as SNAP, TANF, WIC, Section 8, and Medicaid.
- The U.S. Department of Education should include questions in the Free Application for Federal Student Aid (FAFSA) application on whether students are interested in being contacted about potential benefits eligibility, such as TANF, WIC, SNAP, Section 8, and Medicaid.

## Here's what state government can do:

- State legislatures should expand eligibility for college students with lower incomes to access public benefits, such as TANF, WIC, SNAP, Section 8, and Medicaid.
  - ◆ State legislatures should raise the gross income limit in SNAP and designate college courses as SNAP-eligible under the SNAP Education and Training program.<sup>153</sup>
- State legislatures should commission human services agencies to report the participation of college students in public benefits programs, such as SNAP, TANF, WIC, Section 8, and Medicaid.
- State legislatures should require human services agencies to partner with higher education coordinating agencies to estimate the number of postsecondary students eligible for public benefits programs, such as SNAP, TANF, WIC, Section 8, and Medicaid.
- Human services agencies and higher education coordinating agencies should partner to:
  - ◆ Simplify the application processes for public benefits programs so that students can more easily apply and qualify.
  - ◆ Prioritize outreach strategies to promote, publicize, and inform college students about public benefits programs, such as attending campus fairs and presenting at college orientations.
  - ◆ Provide higher education institutions with clearer guidance on public benefits eligibility rules and application process.

**Here's what institutional leaders can do:**

- Each semester higher education institutions should conduct direct outreach to students about their potential benefit eligibility for programs, such as SNAP, TANF, WIC, Section 8, and Medicaid.
- Higher education institutions should gather data on the basic needs of students, including their access to supports and use of supports. Higher education institutions should use the data to allocate resources where they are most needed.

Students should feel supported in seeking the public benefits they need to meet their basic needs, remain enrolled, access nutritional foods, and reduce their stress. Yet, in 2018 the Government Accountability Office found that many students and university administrators are misinformed about the rules of student eligibility and whether college students can receive SNAP benefits at all.<sup>154</sup> Education systems and human services agencies have the opportunity to come together to destigmatize the use of public benefits by identifying eligible college students and conducting direct outreach to inform them of the resources available to them. Several states have already leveraged flexibility in SNAP and TANF to better support families, such as Pennsylvania's [Keystone Education Yields Success \(KEYS\)](#), which focuses on students enrolled at community colleges. The KEYS program is a partnership between the Pennsylvania Department of Public Welfare (DPW) and the Pennsylvania Commission for Community Colleges. KEYS was developed in response to research showing that TANF participants who earn a certificate or degree can support their families through greater access to sustainable wages and opportunities for career advancement.<sup>155</sup>

**Here's what the federal government can do:**

- Congress should appropriate federal funding to support student parents to cover the cost of tuition, fees, housing, food, books, transportation, childcare, and other expenses that are critical to help them stay in school.

**Here's what state government can do:**

- State legislatures should develop stronger partnerships between higher education institutions and social services offices to simplify the process and provide pre-eligibility to student parents for public benefits, such as the [Earned Income Tax Credit \(EITC\)](#), TANF, WIC, SNAP, and childcare subsidies.
- State legislatures should provide higher education institutions with clear guidance on the state public benefits eligibility rules and application process.

**Here's what institutional leaders can do:**

- Each semester, higher education institutions should reach out to student parents about their potential benefit eligibility for program such as the EITC, TANF, WIC, SNAP, and childcare subsidies.
- Higher education institutions should support student parents to cover the cost of tuition, fees, housing, food, books, transportation, childcare, and other expenses that are critical to help them stay in school.



Policymakers should seek to address the “student parent affordability gap,” which represents the major financial barriers student parents face, including the cost of childcare, tuition, fees, housing, food, books and supplies, transportation, and other expenses that are incurred in the pursuit of a higher education.

Almost one quarter of all undergraduate students are parents. These students earn higher grade point averages (GPAs) than their non-parenting students<sup>156</sup> but are less likely to graduate.<sup>157</sup> Student parents work hard to ensure a life of opportunities for themselves and their families. Research shows that student parents need to work an average of 52 hours per week to cover childcare and tuition costs at four-year public institutions in the United States.<sup>158</sup> Higher education institutions can do more to help student parents succeed.



*Students must have the power to make their own decisions about reproduction, including matters associated with contraceptive use, pregnancy, and childbearing. For more information and resources, visit the [National Women’s Law Center](#).*

**Co-locate childcare facilities and college campuses to provide access to affordable high-quality childcare.**

**47**

**The student parent affordability gap is the average amount that a student parent with lower income would pay annually to pursue a degree at a two- or four-year public college in each state, plus the average costs of childcare, minus grants, scholarships, and earnings from working 10 hours per week at the state minimum wage.<sup>159</sup>**

**Here’s what the federal government can do:**

- Congress should provide funding to create Early Head Start and Head Start Centers on college campuses.
- Congress should support participation of childcare providers who are located on or near college campuses in existing sources of childcare funding.
- Congress should provide targeted funding to increase the participation of parents with lower incomes in postsecondary education through the provision of campus-based childcare services.

### Here's what state government can do:

- State legislatures should support the development and operation of affordable, high-quality childcare facilities near college campuses.

### Here's what institutional leaders can do:

- Institutions should provide space for childcare centers to enable student parents to access childcare while they are attending class.

Providing convenient access to affordable, quality childcare would help remove a significant barrier to degree completion for student parents. Colleges and universities can provide a valuable benefit to student parents by establishing partnerships with federal programs, such as the Child Care Access Means Parents in School (CCAMPIS) Program, which seeks to increase the participation of parents with lower incomes in postsecondary education through the provision of campus-based childcare services.<sup>160</sup>

In a survey of 140 student parents, the majority of whom were students of color,

**92%** did not have access to or were unaware of on-campus childcare options, and

**74%** were attending school while providing more than 30 hours of care for their child/ren each week.<sup>161</sup>

**Provide financial aid workshops to current and prospective students of color, first-generation students, Historically underrepresented students, and their families.**

**48**

### Here's what the federal government can do:

- The U.S. Department of Education should ensure higher education institutions and local education agencies (LEAs) have access to and an understanding of best practices to provide informational workshops about financial aid to students of color, first-generation students, historically underrepresented students, and their families.
- The U.S. Department of Education should ensure higher education institutions have access to and an understanding of best practices to improve transparency of financial aid offer letters.

### Here's what state government can do:

- State legislatures should provide support for K-12 schools and other public institutions (e.g., libraries and community centers) to offer financial aid workshops and information for students and families.

### Here's what institutional leaders can do:

- Higher education institutions should ensure that students of color, first-generation students, historically underrepresented students, and their families have access to and an awareness of financial aid resources available to them.
- Higher education institutions should prioritize language accessibility in their efforts to inform students and their families about financial aid resources available to them.





Many students of color, first-generation students, and students with lower incomes may not be fully aware of the financial aid resources and opportunities available to them to make college more affordable. Higher education institutions should host workshops on financial aid before students apply for college. The U.S. Department of Education should share information to support transparency in financial aid offer letters so that students can meaningfully compare their options.<sup>162</sup> The department should also share information for students and their families about financial aid, including:<sup>163</sup>

- The cost of college
- How to estimate financial aid
- How to complete the Free Application for Student Aid (FAFSA) form
- The different types of federal aid available, including their differences and requirements
- How to find and apply for scholarships and grants

#### Here's what state government can do:

- State legislatures should fund programs that expand the availability of scholarships for students of color, first-generation students, and students with lower incomes to participate in learning opportunities, such as study abroad and international exchange programs.

#### Here's what institutional leaders can do:

- Higher education institutions should expand the availability of scholarships for students of color, first-generation students, and students with lower incomes to participate in learning opportunities, such as study abroad and international exchange programs.
- Higher education institutions should ensure that students of color, first-generation students, and students with lower incomes have access to information regarding scholarships that are available to them for programs like study abroad and international exchange programs.

Policymakers and higher education institutions can further promote educational equity by supporting pathways for first-generation students and students with lower incomes to participate in study abroad and international exchange programs. Such programs can enrich the education of students and offer access to post-graduate employment. An expansion in the availability of scholarship opportunities for students with lower incomes and first-generation students can lift barriers to participation in programs, such as study abroad and international exchange programs.

# 49

**Provide scholarships to participate in learning opportunities, such as study abroad and international exchange programs.**

#### Here's what the federal government can do:

- Congress should fund programs that expand the availability of scholarships for students of color, first-generation students, and students with lower incomes to participate in learning opportunities, such as study abroad and international exchange programs.



While students from wealthier families benefit from financial support to study abroad or use their free time for internships, students from lower income families may have to work just to pay for books. Tuition accounts for only 20 percent of the total cost of attendance at community colleges, and the other 80 percent goes towards books, transportation, housing, and food.<sup>164</sup> Considering these financial barriers, only 8 percent of first-generation students will participate in study abroad programs<sup>165</sup> compared to 32 percent of all college students,<sup>166</sup> and students of color remain significantly underrepresented in study abroad programs as shown in the data table below.<sup>167</sup>



**Percent of U.S Study Abroad Students by Race/Ethnicity, 2022**

Race/Ethnicity	U.S. Postsecondary Enrollment	U.S. Students Abroad
African American or Black	12.5 percent	5.3 percent
Asian American/Pacific Islander	7.5 percent	8.6 percent
Caucasian	50.9 percent	68.6 percent
Hispanic/Latino American	19.6 percent	11.9 percent
Multiracial	4.1 percent	4.8 percent
American Indian/Alaska Native	0.6 percent	0.4 percent

Source: NAFSA: Association of International Educators, Trends in U.S. Study Abroad, 2022

# 50

**Provide scholarships for students of color, first-generation students, and students with lower incomes who seek to participate in internships and fellowships.**

### **Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research on models for increasing participation rates of students of color, first-generation students, and students with lower incomes in internships and fellowships.

### **Here's what state government can do:**

- State legislatures should establish state partnerships between higher education institutions, government entities, and businesses to provide scholarships for students of color, first-generation students, and students with lower incomes who seek to participate in internships.

### **Here's what institutional leaders can do:**

- Higher education institutions should provide scholarships for students of color, first-generation students, and students with lower incomes who seek to participate in internships, especially those that are unpaid.
- Higher education institutions should ensure that scholarship information for students who seek to participate in internships is shared in recruitment materials, catalogs, student handbooks, and on public websites.

Higher education institutions can support students of color, first-generation students, and students with lower incomes in their access to internships and fellowships by providing scholarships that allow them to explore their interests and build meaningful careers.

All students should have access to internship and fellowship opportunities that support their academic and professional learning, equipping students with skills and networks essential for growing careers. However, research shows that 74 percent of paid internships go to white students, while 6 percent go to Black students, 5 percent to Asian American students, 8 percent to Hispanic students, 0.5 percent to Native American students, and 0.1 percent to Native Hawaiian and Pacific Islander students.<sup>168</sup> More than 56 percent of children under the age of 18 in the United States live in a household where no parent has a college degree,<sup>169</sup> however, first-generation students account for 25 percent of students who never intern and just 19 percent of paid interns.<sup>170</sup> In comparison to continuing-generation students (41 percent), only 27 percent of first-generation students participated in internships.<sup>171</sup>



# 51

**Provide scholarships to cover lodging and travel expenses for students of color, students with lower incomes, and first-generation students who represent their institutions at conferences and networking events.**

### Here's what the state government can do:

- State legislatures should fund programs to cover the lodging and travel expenses, including meals, for students of color, first-generation students, and students with lower incomes who represent their institutions at conferences and networking events.

### Here's what institutional leaders can do:

- Higher education institutions should expand the availability of scholarships for students of color, first-generation students, and students with lower incomes that cover their lodging and travel expenses, including meals, when representing their institutions at conferences and networking events.
- Higher education institutions should ensure that students of color, first-generation students, and students with lower incomes have access to information regarding scholarships available to them when representing their institutions at conferences and networking events.

Equity in higher education extends beyond lecture halls and encompasses all facets of student life, including when students have been selected as representatives of their institutions and offered the opportunity to travel to conferences and networking events.

Financial barriers may prevent students of color, first-generation students, and students with lower incomes from gaining access to professional networks, sharing their research, and acquiring exposure to career opportunities. To mitigate this, travel scholarships specifically designed to support students with fewer financial resources should provide food security and include coverage of all meals, as well as lodging for overnight travel.

**Invest in the academic success of college athletes, particularly those with lower incomes.**

# 52

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate data disaggregated by race, ethnicity, gender, and socioeconomic status on the enrollment and academic outcomes of college athletes, as well as best practices for ensuring academic success for student athletes.
- Congress should enact legislation that federally recognizes college athletes at public universities as employees.

### Here's what state government can do:

- State legislatures should enact legislation that recognizes college athletes at public universities as employees.
- State legislatures should fund programs that support the academic outcomes of college athletes with lower incomes.

### Here's what institutional leaders can do:

- Higher education institutions should recognize college athletes as employees, including as unionized employees if they choose to unionize.
- Higher education institutions should provide insurance coverage for both short-term and long-term health consequences of athletic participation.
- Higher education institutions should provide need-based emergency aid in the event of injury.
- Higher education institutions should provide no-cost meals, free housing, and cover athletic-related medical expenses for students with lower incomes.
- Higher education institutions should strengthen their athletics programs by gathering input on strategies to meet the basic needs of college athletes who are students of color, first-generation students, and students with lower incomes. Higher education institutions should appropriately compensate college athletes for their participation in these surveys.

Varsity athletics in higher education served as the initial entry point for racially marginalized students during the integration era. Post-integration, athletics programs have remained a pathway for selective institutions to enroll Black students, offering a unique window into how these campuses treat and value these students. Higher education institutions continue to rely on the unpaid labor of traditionally underrepresented students to enhance campus revenue, while Black athletes are increasingly marginalized in non-athletic settings — reinforcing stereotypes

that they're only on campus solely to play sports rather than to pursue an education.<sup>172</sup> While 69 percent of all college athletes<sup>173</sup> who entered in the 2016-17 class graduated by 2023, only 55 percent of Black male athletes graduated, which was the lowest among any athlete group by race and gender.<sup>174</sup>

Although athletes are the centerpiece of college athletics revenue generation, they are not considered employees of their institution and receive no compensation for their athletic labor — while also being prohibited from seeking other means of income during their sport season.<sup>175</sup> Despite their labor fueling a multibillion dollar international industry, 14 percent of college athletes at NCAA Division I schools in 2019 were unhoused and 24 percent were food insecure.<sup>176</sup> Higher education institutions have focused their spending on coaching salaries and marketing efforts, rather than meeting these students' basic needs both inside and outside the classroom. Across all NCAA Division 1 schools in 2023, total spending on coach and staff salaries was roughly 10 times the spending on medical expenses and insurance premiums for college athletes, and it far exceeded total spending on athletic student aid.<sup>177</sup> Institutions have also prioritized short-term athletic success over the long-term health of their athletes, resulting in consequences such as medical debt and lasting medical harm.<sup>178</sup> The absence of mandatory medical insurance provided to athletes signals that institutions only value traditionally underrepresented students for their uncompensated athletic labor.

Disaggregated data on the race, ethnicity, gender, and socioeconomic status of college athletes, in addition to student athlete

outcomes data, is critically needed to gain a better understanding of the experiences of college athletes nationwide.<sup>179</sup> Policymakers and higher education institutions must make it expressly clear that marginalized athletes are valued not just for their physical abilities, but also for their academic prowess. The widespread failures of institutions in graduating their athletes are just as significant for an institution's racial equity as cases of athletes successfully completing their degrees or going professional.<sup>180</sup>

*Policymakers should meet their obligation to protect and ensure the success and safety of all students, including college athletes. For more resources and information, see [The Center for Law and Social Policy's report "Equal Play, Unequal Pay: Race-Conscious Admissions and the Systemic Exploitation of Black Male Athletes."](#)*

## 53

### Prioritize need-based financial aid for graduate students.

#### Here's what the federal government can do:

- Congress should provide need-based financial aid to subsidize the cost of graduate education for students with lower incomes.

#### Here's what state government can do:

- State legislatures should appropriate state financial aid to subsidize the cost of graduate education for students with lower incomes.

#### Here's what institutional leaders can do:

- Higher education institutions should limit increases on tuition and fee prices for graduate school programs.
- Higher education institutions should ensure that prospective graduate students have access to and an understanding of their financial aid options prior to enrollment.
- Higher education institutions should establish recruitment and retention programs dedicated to students of color seeking to enroll in graduate programs.
- Higher education institutions should cover the cost of graduate school application requirements for students with lower incomes seeking to continue graduate programs at the same institution.

For many career pathways, an education beyond a bachelor's degree is a requirement or otherwise leads to career advancement and higher earnings. Students of color may face barriers to enrollment and attaining a graduate degree. Of the 57,596 doctorates awarded across U.S. universities in 2022, 5 percent were awarded to Latino graduates, 4 percent to Black graduates, and less than 1 percent to American Indian or Alaska Native graduates.<sup>181</sup> In addition to racial disparities in degree access and attainment, Black graduate students are more likely than their white peers to graduate from graduate school with loan debt.<sup>182</sup> Without accounting for undergraduate debt, the average debt of master's and doctoral degree programs alone is \$78,118.<sup>183</sup>



Programs such as the University of Maryland, Baltimore [Meyerhoff Scholars Program](#) seek to recruit, retain, and provide a network of support for students of all backgrounds who plan to pursue doctoral study in the sciences or engineering and who are interested in the advancement of underrepresented professionals in those fields.

## 54 Provide immediate and automatic student loan debt cancellation to all student borrowers.

Here's what the federal government<sup>184</sup> can do:

- Federal policymakers should ensure that debt cancellation of at least \$50,000 is extended to all student loan borrowers.
- Federal policymakers should ensure that debt cancellation is not limited based on the sector of institution attended.
- Federal policymakers should ensure that the debt cancellation process is automatic, easy, accessible, and does not have negative credit implications.
- Federal policymakers should eliminate the taxation of forgiven federal student loan debt, regardless of the reason for discharge.
- Federal policymakers should strengthen policies that increase meaningful access and affordability in higher education.

Federal policymakers must end the harmful and burdensome cycles of student debt and provide immediate cancellation and relief to borrowers.

Canceling student debt provides relief for existing borrowers and opens doors for the next generation of students and families pursuing higher education. Federal policymakers should ensure that debt cancellation is extended to all student loan borrowers, including Direct Loan, [Family Federal Education Loan](#) (FFEL), graduate, and [Parent PLUS](#) borrowers, without regard to borrower income, default status, or repayment plan. The cancellation of at least \$50,000 per borrower would eliminate the debt burden experienced by more than 75 percent of federal borrowers.<sup>185</sup> This would include full student loan debt cancellation for 85 percent of Black borrowers and 96 percent of Latino borrowers in the lowest income quintile.<sup>186</sup>

For more information, see the [Civil Rights Principles for Student Debt Cancellation](#).





# Campus Climate



## CAMPUS CLIMATE

55. Establish strong institutional policies to ensure compliance with Title VI, Title IX, and Section 504.	74
56. Fully fund the U.S. Department of Education and its Office for Civil Rights (OCR).	75
57. Create and share information about internal civil rights complaint processes.	75
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59. Add institutions of higher education to the Civil Rights Data Collection (CRDC).	77
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62. Audit the racial, ethnic, and gender diversity of the board of trustees.	80
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65. Implement restorative practices to address hate, bias, and discrimination incidents on campus.	83
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67. Provide students residential and campus housing affinity options that affirm their cultural, racial, and ethnic identities.	85
68. Celebrate cultural and identity-based college graduations for students of color.	85

**Racial equity in higher education is dependent upon policies oriented at developing healthy and vibrant campuses where all students can thrive. Students must not only have access to the college application process and be able to afford their education — they also deserve a supportive learning environment that will enable them to persist and complete their degree program.** A deep commitment to implement and enforce federal civil rights laws is foundational to ensuring equal opportunity in higher education. Colleges and universities should look to strengthen their institutional systems, practices, and policies that address all forms of hate, prejudice, and discrimination on campus and create environments where all students can thrive. Diversity, equity, inclusion, and accessibility (DEIA) is the responsibility of all institutional leaders, including boards of trustees, college presidents, deans, staff, and faculty — along with the student body.

- Higher education institutions should identify and make widely known civil rights coordinators who will support compliance with nondiscrimination law and receive and address complaints of discrimination, including harassment.
- Higher education institutions should provide all students who report discrimination, including harassment, with supportive measures that restore and preserve their equal access to education.
- Higher education institutions should prioritize institutional efforts to create diverse, equitable, inclusive, and accessible campus environments in order to prevent discrimination, including harassment.

Higher education institutions receiving federal funding must affirm a greater sense of belonging and protect the civil rights of all students by establishing strong university policies that are in compliance with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973. All higher education institutions, including private colleges and universities, must create safe and healthy campuses to protect the civil rights of their students. All members of the campus community must understand their obligations and how to take action when they have knowledge of discrimination, including harassment, on campus.

**55**

**Establish strong institutional policies to ensure compliance with Title VI, Title IX, and Section 504.**

**Here's what the state government can do:**

- Higher education coordinating agencies should collect and disseminate best practices for preventing and responding to discrimination, including harassment.

**Here's what institutional leaders can do:**

- Higher education institutions should broadly disseminate information to the entire campus community about prohibited discrimination, including harassment, and processes for filing complaints.



**Here's what the federal government can do:**

- Congress should fully fund the U.S. Department of Education and its Office for Civil Rights (OCR).
- OCR should robustly enforce civil rights laws, providing guidance, data, and technical assistance to support compliance and intervening thoroughly and expeditiously when violations occur.

Congress must increase funding for OCR to better fulfill its duty to ensure equal access to education at all federally funded institutions.

The U.S. Department of Education and OCR require additional funding in order to better serve students across the entire nation. OCR is tasked with investigating complaints of discrimination and determining whether federal civil rights laws such as Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973 have been violated.

Institutions of higher education and OCR must robustly investigate all reported incidents of discrimination and enforce appropriate remedies. While OCR received more than six times as many complaints in 2022 than in 1981, the number of OCR staff was cut in half over that same time period.<sup>187</sup>

It is imperative — following the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* case especially — that OCR is resourced to uphold the civil rights of all students in higher education.

**Here's what the state government can do:**

- State legislatures should consider providing protections from discrimination beyond those provided under federal law.
- States should establish an agency that provides oversight and enforcement of state civil rights laws.
- State legislatures should require all higher education institutions to have a student complaint process to support compliance with state nondiscrimination law.
- State legislatures and higher education coordinating agencies should require higher education institutions to audit existing student complaint processes regarding student discrimination/harassment based on sex (including sexual orientation, gender identity, sex characteristics, and pregnancy), race, color, national origin, ethnicity, or disability on their campuses.

**Here's what institutional leaders can do:**

- Higher education institutions should have a complaint process in line with their campus policy prohibiting discrimination.
- Higher education institutions should have a website and hotline dedicated to receiving complaints that is fully accessible to all students and provides the option for students to remain anonymous.
- Higher education institutions should audit existing complaint processes regarding discrimination.

Every student has the right to an education free from discrimination. By establishing and strengthening the student complaint process, higher education institutions can work to ensure that civil rights are protected and upheld for all members of the campus community, regardless of their race, sex (including sexual orientation, gender identity, sex characteristics, and pregnancy), disability, or any other protected characteristic. Additionally, higher education institutions should audit their existing complaint processes to better understand or improve:

- How these reports are handled and resolved through the complaint process, including reports of microaggressions or psychological impacts of discrimination/harassment.
- How higher education institutions monitor compliance of individuals found to have violated campus policies on discrimination and harassment, including how violations intersect with faculty senate/tenure systems. The audit should also explore ways to improve student accessibility and navigation of the complaint process, especially considering that many reports of discrimination based on sex (including sexual orientation, gender identity, sex characteristics, and pregnancy), race, color, ethnicity, national origin, or disability on their campuses go unreported.

## Disaggregate data on student complaints.

# 58

### Here's what the federal government can do:

- The Office for Civil Rights (OCR) should publicly disseminate data annually on student complaints received through the OCR complaint process against higher education institutions, including complaints of discrimination or harassment based on race and/or ethnicity (Title VI), sex (Title IX), and/or disability (Section 504).
- OCR should disaggregate data on student complaints received through the OCR student complaint process by higher education institution.

### OCR should collect and publicly disseminate data by:

- Student race and ethnicity
- Sex (including sexual orientation, gender identity, sex characteristics, and pregnancy)
- Disability
- Religion
- Student education level (early education, elementary, middle, secondary, certificate program, undergraduate, graduate)
- Type of violation
- Name of higher education institution
- Format of complaint (electronic complaint form, letter, email)



**OCR should additionally analyze and report data, including:**

- Number of OCR complaints with approved 180-day period waivers and general data trends associated with 180-day waivers.
- Number of OCR complaints requiring signed consent forms and the number of closed complaints due to lack of signed consent forms, resolved complaints with determinations of noncompliance, and resolved complaints with determinations of compliance.

- Congress should use the CRDC to inform policy decisions to direct and appropriate federal funding to build safer, more inclusive, and nondiscriminatory campuses.
- OCR should use the CRDC to support enforcement of civil rights laws.

**Here's what the state government can do:**

- State legislatures should use the CRDC to inform policy decisions to direct and appropriate state funding to build safer and more inclusive campuses.

**Here's what institutional leaders can do:**

- Higher education institutions should use the CRDC to inform decisions and protect the civil rights and wellbeing of students.

**59**

**Add institutions of higher education to the Civil Rights Data Collection (CRDC).**

**Here's what the federal government can do:**

- The U.S. Department of Education should collect information from institutions of higher education — public, private, and for-profit — through the Civil Rights Data Collection (CRDC).
- The U.S. Department of Education should ensure that the CRDC, including data from institutions of higher education, is collected, conducted, and disseminated on an annual basis.
- The U.S. Department of Education should ensure that CRDC higher education data are disaggregated and cross-tabulated to identify areas where change is needed.
- The U.S. Department of Education should provide oversight and technical assistance to higher education institutions to ensure full and accurate compliance with data collection.

The CRDC is a federally mandated data collection that K-12 schools and districts that receive federal financial assistance from the Department of Education are obligated to complete. Data on the civil rights of postsecondary students should also be collected and disseminated on an annual basis from all public, private, and for-profit higher education institutions.

The CRDC is a key resource for policymakers, communities, and schools to better understand the experiences of students of color, LGBTQIA+ students, and students with disabilities.<sup>188</sup> The CRDC collects data on student enrollment, access to educational programs and services, complaints, and discipline, which can help with administering and enforcing civil rights laws. OCR relies on school districts to provide CRDC data to support investigations of complaints of discrimination and determine whether federal civil rights under Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973 have been violated.



# 60

**Collect, conduct, and disseminate research on any shift in demographics, retention, or student outcomes of first-year class profiles since the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision.**

## **Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research on any shift in demographics, retention, and student outcomes of first-year class profiles since the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision.

## **Here's what the state government can do:**

- Higher education coordinating agencies should require higher education institutions to collect, conduct, and disseminate data on any shift in demographics, retention, and student outcomes of first-year class profiles since the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision.

## **Here's what institutional leaders can do:**

- Higher education institutions should collect, conduct, and disseminate data on any shift in demographics of first-year class profiles since the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision. Higher education institutions should ensure this information is accessible to the general public.

- Higher education institutions should use their data analysis as a tool to develop targeted recruitment strategies centering traditionally underrepresented students.

Higher education institutions and the U.S. Department of Education should collect, conduct, and disseminate data on any shift in demographics, retention, and student outcomes of first-year class profiles since the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision. Higher education institutions should further make their reported data easily accessible to the general public so students can gauge the environment they will be met with on campus.

Before the *Students for Fair Admissions (SFFA) v. University of North Carolina (UNC)/Harvard* decision, several states had already implemented bans on race-based affirmative action in college admissions. These states saw dips in their enrollment of Black and Latino students, especially at their most selective institutions. For example, before voting to ban the practice of race-based affirmative action in 1996, California's higher education institutions were fairly representative of their high school graduate population. Once the ban was implemented, the enrollment of Black and Latino students at two of California's most selective institutions, UC Berkeley and UCLA, fell by 40 percent.<sup>189</sup> Across the country, higher education institutions are failing to make their student bodies representative of the populations of their home state and the country.<sup>190</sup>

# 61

## Conduct campus racial climate assessments and disclose the results of campus climate surveys.

### Here's what the federal government can do:

- Congress should appropriate funds to enable annual campus racial climate assessments at all higher education institutions.
- The U.S. Department of Education should collect and disseminate the results of annual racial climate assessments at all higher education institutions. Results should be shared publicly in an accessible manner.
- The U.S. Department of Education should make model campus climate surveys available to institutions of higher education.
- Congress should make new funding contingent on states assessing racial and socioeconomic disparities and student outcomes.

### Here's what the state government can do:

- State legislatures should require mandatory campus climate metrics in state outcomes-based funding measures. Metrics should be comprehensive to account for how a higher education institution is addressing its historical legacy of inclusion/exclusion of students of color, structural diversity, psychological climate, and student behavior.<sup>191</sup>
- State legislatures should increase funding for higher education coordinating agencies given their roles in enforcement, dissemination, and monitoring of state campus racial climate requirements.

### Here's what institutional leaders can do:

- Higher education institutions should conduct annual campus racial climate assessments.
- Higher education institutions should ensure that campus racial climate assessment planning includes a strong representation of students (including students of color), faculty, staff, and any campus office of diversity, equity, inclusion, and accessibility.

Higher education institutions can gain critical insights on student experiences and improve their campus community by collecting and analyzing campus racial climate assessments. Higher education institutions could build more inclusive campuses by learning about the needs of their student community and being responsive through practices such as facilitating cross-racial interactions and discussions on race. Research shows that at colleges and universities that have seen an increase in the numbers of students of color on campus without implementing facilitated cross-racial interaction and ongoing discussions about race, students of color reported less overall satisfaction with their college experience.<sup>192</sup> Colleges and universities can use the results of assessments to better understand the experiences of students of color and adapt through necessary practices that promote inclusive campuses.



**Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research on the demographics of boards of trustees at private and public higher education institutions.

**Here's what the state government can do:**

- State legislatures should set aspirational benchmarks for the inclusion of board members of various racial and ethnic backgrounds that reflect the state's demographics.

**Here's what institutional leaders can do:**

- State university systems and higher education institutions should audit the racial and ethnic diversity of their boards of trustees and identify barriers to inclusion of members of various racial and ethnic backgrounds.
- State university systems and higher education institutions should assess how their board of trustees invites, welcomes, and includes the concerns of racially and ethnically diverse students and student organizations in their decision-making processes.
- State university systems and higher education institutions should share the membership and demographics of their boards of trustees publicly and in an accessible manner.
- Higher education institutions should include student representation on their board of trustees.

Racial equity must be a priority at all higher education institutions and throughout every facet of campus life, including boards of trustees.

Boards of trustees (also called boards of visitors, regents, governors, fellows, supervisors, or overseers) govern through decision-making on institutional programs, budgets, and policies that impact students of all backgrounds. People of color remain underrepresented in these leadership roles, and in 2021, 80 percent of trustees at private colleges were white and two-thirds were men. At public institutions, 65 percent of trustees were white and 63 percent were men.<sup>193</sup>

**"Most of the people who are on the board of trustees are never even on campus, so they don't even know what's actually happening here. Trying to get them to understand how students are feeling and what's going on within the student population is really important to address the racial climate here."<sup>194</sup>**

—Focus group participant



# 63

## Create competitive grant programs for higher education institutions to improve campus climates.<sup>195</sup>

### Here's what the federal government can do:

Congress should build a competitive federal grant program for higher education institutions to improve campus climate. Allowable uses should include:

- Developing and administering campus climate surveys.
- Establishing cultural and identity centers.
- Establishing dedicated staff positions and offices responsible for campus climate.
- Establishing student advisory boards to garner campus climate recommendations.
- Hiring students to develop and execute campus climate activities (e.g., affinity months, cultural presentations, etc.).
- Offering career pathway programs for students of color and students with lower incomes who seek to serve their communities.
- Offering courses and programs that explore race, ethnicity, and social justice, including within the history and context of the campus community.
- Diversity, equity, inclusion, and accessibility training for all faculty and staff.
- Developing initiatives that consider alternatives to campus police departments and provide safety on campus without undue risk of criminalization.

- Supporting initiatives that push back against attempts to stifle speech and campus life most central to the college experiences of students of color.
- Conducting systematic reviews of the quality of academic advising across the institution and making necessary changes to support student outcomes.
- Creating opportunities for more students of color to serve in decision-making leadership across the institution.

### Here's what the state government can do:

State legislatures should create competitive grant programs for higher education. Allowable uses should include:

- Developing campus climate surveys.
- Establishing cultural and identity centers.
- Establishing student advisory boards to garner campus climate recommendations.
- Hiring students to develop and execute campus climate activities (e.g., affinity months, cultural presentations, etc.).
- Offering career pathway programs for students of color and students with lower incomes who seek to serve their communities.
- Offering courses and programs that explore race, ethnicity, and social justice, including within the history and context of the campus community.
- Diversity, equity, inclusion, and accessibility training for all faculty and staff.

- Developing initiatives that consider alternatives to campus police departments and provide safety on campus without undue risk of criminalization.
- Supporting initiatives that push back against attempts to stifle speech and campus life most central to the college experiences of students of color.
- Conducting systematic reviews of the quality of academic advising across the institution and making necessary changes to support student outcomes.
- Creating opportunities for more students of color to serve in decision-making leadership across the institution.

Federal and state competitive grants can support the development of campus climate programs that promote diversity, equity, inclusion, and accessibility in higher education. By investing in these efforts, federal and state competitive grants can contribute to safer campuses where all students are valued, respected, and empowered to succeed.

# 64

**Prioritize diversity, equity, inclusion, and accessibility (DEIA) and offer antiracism learning opportunities.**<sup>196</sup>

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on access to diversity, equity, inclusion, and accessibility (DEIA) and antiracism learning opportunities, including curriculum, and their effectiveness in promoting safer and more inclusive campuses.

### Here's what the state government can do:

- State legislatures should enact legislation that requires higher education institutions to offer training or learning opportunities on DEIA and antiracism.
- State legislatures should appropriate funding to support culturally responsive teaching practices and professional development among faculty and staff at higher education institutions.

### Here's what institutional leaders can do:

- Higher education institutions should offer DEIA and antiracism learning opportunities, including training and culturally responsive curriculum.
- Higher education institutions should invest in the professional development of faculty and staff to build stronger culturally responsive teaching practices.

Today's students should receive an education that actively engages them in an interconnected and diverse learning community. DEIA in higher education can support students in feeling recognized, valued, and respected. Research shows that student belonging improves academic outcomes, increases continued enrollment, and is protective for mental health.<sup>197</sup> Yet many states continue to introduce anti-DEIA legislation in higher education. And since 2022, only two states, Washington and New Mexico, have passed bills requiring higher education institutions to offer training or learning opportunities on DEIA or antiracism.<sup>198,199</sup>



**Higher education institutions should provide robust learning opportunities, through training and curriculum, on the truthful history of racism and colonization, which continue to influence societal systems of privilege.<sup>200</sup>**

#### **Here's what institutional leaders can do:**

- Higher education institutions should ensure that the social and emotional safety and well-being of students of color are prioritized in the development of restorative practices aimed at addressing hate, bias, and discrimination incidents on campus.

For years, the National Center for Education Statistics (NCES) has reported that race is the most common motivating bias for committing on-campus hate crimes at postsecondary institutions.<sup>201</sup> In 2020, race was the motivating bias in more than half of on-campus hate crimes.<sup>202</sup> In a national survey of undergraduate students, 59 percent of students believed that increasing accountability for acts of racism is an important focus area for advancing campus racial climate. Higher education institutions should ensure that the development of restorative practices prioritizes the social and emotional safety and well-being of students of color. Through restorative practices, perpetrators engage in learning to understand their role, action, and responsibility in restoring what they have taken from their community.<sup>203</sup>

**65**

**Implement restorative practices to address hate, bias, and discrimination incidents on campus.**

#### **Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research on the effectiveness of restorative justice practices to address hate, bias, and discrimination incidents on college campuses.
- The U.S. Department of Education should share best practices for implementing restorative practices and complying with non-discrimination obligations.

#### **Here's what the state government can do:**

- State legislatures should require higher education institutions to develop restorative practices that address hate, bias, and discrimination incidents on campuses.



# 66

## Build support for cultural and identity centers that serve underrepresented college students.<sup>204</sup>

### Here's what the federal government can do:

- Congress should appropriate funding for programs that strengthen cultural and identity centers serving underrepresented college students, including students of color, first-generation students, and students with lower incomes.
- The U.S. Department of Education should collect, conduct, and disseminate research on access to cultural and identity centers and their impact on the college completion of underrepresented students.
- The U.S. Department of Education should collect, conduct, and disseminate research on the funding that higher education institutions provide to support racial and ethnic cultural centers and student organizations.
- The U.S. Department of Education should provide guidance on best practices for programs offered through identity and cultural centers that serve underrepresented students.

### Here's what the state government can do:

- State legislatures should support higher education institutions in establishing cultural and identity centers for underrepresented college students, including students of color, first-generation students, and students with lower incomes. State legislatures should provide permanent and substantial funding for this purpose.

- Higher education coordinating agencies should provide higher education institutions with guidance on best practices for cultural and identity centers.

### Here's what institutional leaders can do:

- Higher education institutions should establish cultural and identity centers for traditionally underrepresented students.
- Higher education institutions should strengthen the practices of their cultural and identity centers by gathering the input of students of color, first-generation students, and students with lower incomes. Higher education institutions should appropriately compensate students who provide input.

Cultural and identity centers often serve as central hubs for peer advising, tutoring, mentorship, and leadership development among underrepresented students. Establishing cultural and identity centers is one of many critical steps to advancing students' sense of belonging and building institution-wide structures to support underrepresented students. In a national survey of undergraduate students, 58 percent of students believed that affinity groups or cultural spaces where students can connect with peers contributed towards a positive campus climate for underrepresented students.<sup>205</sup>



# 67

**Provide students residential and campus housing affinity options that affirm their cultural, racial, and ethnic identities.<sup>206</sup>**

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on campus housing affinity options and their effectiveness on student outcomes.

### Here's what the state government can do:

- Higher education institutions should provide students with residential and campus housing affinity options that affirm their cultural, racial, and ethnic identities.
- Higher education institutions should ensure that information about housing affinity options is shared in recruitment materials, catalogs, student handbooks, and on public websites.

Through affinity choices in campus housing, students can choose to live with peers who

share common interests or a common identity such as race or ethnicity. Similarly to sports teams living together, students of color can find community with those who have a shared affinity and have interest in connecting to students who share cultural backgrounds.

**Celebrate cultural and identity-based college graduations for students of color.<sup>207</sup>**

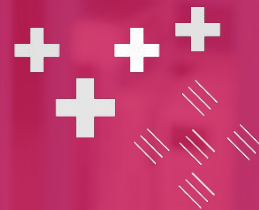
# 68

### Here's what institutional leaders can do:

- Higher education institutions should fund and host cultural and identity-based college graduations.

Cultural and identity-based college graduations celebrate the educational journey of students of color and their families by providing a platform for them to honor their heritage and traditions. These ceremonies foster a sense of belonging and inclusion and acknowledge their diverse experiences and contributions within the campus communities.





# Campus Support Programs

# CAMPUS SUPPORT PROGRAMS

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For many generations of graduates of color, higher education has served as a bridge for social and economic mobility. As traditionally underrepresented students walk across the graduation stage and receive their diplomas, a great sense of personal and community pride is felt. Yet many of these students will navigate higher education while facing hunger, lack of housing, and inadequate transportation to attend class. Basic needs such as childcare, transportation, housing, and food security are a matter of human rights. Policymakers at all levels should transform higher education to ensure that the basic living needs are met for every student with a lower income, ensuring an even more prosperous and healthy society.

#### Here's what the state government can do:

- State legislatures should require higher education institutions to establish a minimum amount of permanent, annual funding toward supporting racial and ethnic cultural centers, student organizations, and alumni organizations that seek to address the needs of specific racial and ethnic communities.

#### Here's what institutional leaders can do:

- Higher education institutions should provide permanent and annual funding towards supporting racial and ethnic cultural centers, student organizations, and alumni organizations that seek to address the needs of specific racial and ethnic communities.
- Higher education institutions should ensure that information about student and alumni organizations that seek to address the needs of racial and ethnic communities are shared in recruitment materials, catalogs, student handbooks, and on public websites.

Higher education institutions should support student and alumni organizations that seek to contribute to the success of students of color in higher education.

Student organizations often create safe spaces and organize events dedicated to the rich experiences of racial and ethnic communities on campus. Organizations such

69

**Support student and alumni organizations that seek to address the needs of racial and ethnic communities.<sup>208</sup>**

#### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on the disparities in financial resources dedicated to historically Black and multicultural Greek organizations, compared with historically white Greek organizations.





as historically Black and multicultural Greek organizations may host cultural celebrations and build support networks that foster inclusivity, a sense of belonging, and empower their student members. Similarly, alumni organizations that seek to address the needs of marginalized students often establish mentorship programs, scholarships, and networking opportunities to continue supporting students of color beyond graduation and into professional spheres.

## **70** Increase access to campus-based mental health care services.

### **Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research on the impact that access to campus-based mental health services has on the academic outcomes of students of color, first-generation students, and students with lower incomes.



### Here's what institutional leaders can do:

- Higher education institutions should increase access to and provide culturally competent mental health services.
- Higher education institutions should offer mental health services at flexible times in the day and in an accessible manner.
- Higher education institutions should increase recruitment and retention of mental health professionals, especially people of color and LGBTQIA+ professionals.

As colleges and universities look to improve the mental health services available to the students they serve, policymakers should be responsive to the significant increases observed in mental illness rates since the pandemic. A national survey of 96,000 revealed that during the 2021-22 academic year, college students experienced all-time high rates of depression, anxiety, and suicidality.<sup>209</sup> During the 2022-23 academic year, the rate of depression for college students was 41 percent, a decrease of only 3 percent from the previous year, and just 36 percent of college students reported seeing a mental health therapist or counselor in the past year.<sup>210</sup> However, for students of color and those in rural communities, their mental illness may often go untreated. White college students are almost twice as likely as Asian American and Black students to seek mental health care.<sup>211</sup> Although nearly half of college students are students of color, 72 percent of college counselors are white.<sup>212</sup> In 2024, the U.S. Department of Education shared relevant information on supporting mental health in higher education.<sup>213</sup>

## Strengthen support programs and initiatives serving lesbian, gay, bisexual, transgender, queer, intersex, and asexual (LGBTQIA+) students.

# 71

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on the access and impact that campus support services have on the academic outcomes of LGBTQIA+ students, disaggregated by race and ethnicity.
- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of guidance to support LGBTQIA+ students.

### Here's what the state government can do:

- State legislatures should require higher education institutions to provide campus support services designed to serve queer, transgender, and intersex students. State legislatures should provide permanent and substantial funding for this purpose.

### Here's what institutional leaders can do:

- Higher education institutions should establish measures and structures of support for the health, social, and financial well-being of LGBTQIA+ students of color who may face increased marginalization, including:
  - ◆ Access to safe and supportive campus spaces

- ◆ Equal access to sex-separated programs and facilities, including dorms, restrooms, locker rooms, and student activities (including sports)
  - ◆ Access to single-user restrooms (but no student should be forced to use these in place of sex-separated restrooms or locker rooms)
  - ◆ Respect for correct names and pronouns
  - ◆ Affirming health care, including culturally competent mental health care
  - ◆ Housing and food security
  - ◆ Reliable and safe transportation
- Higher education institutions should strengthen their support programs and practices by gathering the input of LGBTQIA+ students of color. Higher education institutions should appropriately compensate students who provide input.

Colleges and universities should offer greater access to life-saving and supportive services for queer, trans, and intersex students.

For many LGBTQIA+ students, attending college is an opportunity to be in community with other queer students. However, if colleges and universities are not responsive to the needs of LGBTQIA+ students — such as housing, food security, and affirming mental health care — navigating the higher education system may present significant barriers to achieving their dreams. One in three LGBTQIA+ college students have seriously considered suicide, and rates are higher for LGBTQIA+ students of color.<sup>214</sup> LGBTQIA+ college students with access to student services designed to serve queer students are 44 percent less likely to attempt suicide<sup>215</sup> compared to queer students without access.<sup>216</sup>

## Enhance campus support services for pregnant and parenting students.

# 72

### Here's what the federal government can do:

- Congress should increase funding for affordable childcare, on and off campus.
- Congress should increase funding for early education and pre-kindergarten services.
- Congress should appropriate funding to support campus Title IX offices' work to prevent and investigate discrimination against pregnant students.
- The U.S. Department of Education should strengthen Title IX protections for pregnant and parenting students and ensure that higher education institutions have access to formal guidance on Title IX.
- The U.S. Department of Education should disaggregate data about student opportunities and outcomes by students' parenting statuses.
- Congress should provide targeted funding to increase the participation of parents with lower incomes in postsecondary education through the provision of campus-based childcare services.<sup>217</sup>

### Here's what the state government can do:

- State legislatures should require lactation accommodations at all higher education institutions.
- State legislatures should strengthen nondiscrimination protections for pregnant and parenting students in their state.

### Here's what institutional leaders can do:

- Higher education institutions should administer a survey for student parents and use results to strengthen campus support programs that serve pregnant and parenting students.
- Higher education institutions should ensure that student parents are aware of the resources available to them, including access to single-parent housing, reliable childcare, programs to increase social connectedness, and health supports.
- Higher education institutions should implement policies that excuse absences related to pregnancy or childcare and provide reasonable accommodations for parenting students as outlined in Title IX.
- Higher education institutions should ensure that information about support services for student parents is shared in recruitment materials, catalogs, student handbooks, and on publicly available websites.
- Higher education institutions should respect the reproductive autonomy of pregnant students.

Student parents face significant barriers to college completion, with 52 percent of student parents leaving school within six years without obtaining a degree due to factors such as a lack of access to childcare.<sup>218</sup> Institutions such as the Wilson College in Pennsylvania are seeking to reduce these barriers through their [Single Parent Scholar Program](#), which provides campus housing and subsidized childcare to eligible single parents. The program provides family-friendly, on-campus housing year-round to single parents and their children while parents pursue a degree full-time.<sup>219</sup>



*Students must have the power to make their own decisions about reproduction, including matters associated with contraceptive use, pregnancy, and childbearing. For more information and resources, visit the [National Women's Law Center](#).*

# 73

## Increase the availability of campus services, such as advising and tutoring, by adapting to flexible hours and locations.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on the availability of student support services, such as advising and tutoring, outside of traditional hours.

### Here's what the state government can do:

- Higher education institutions should hire faculty and staff to offer greater flexibility in hours and locations of academic support services, such as advising and tutoring.
- Higher education institutions should conduct surveys and gather input from students of color, first-generation students, and students with lower incomes to identify barriers to accessing campus services. Higher education institutions should appropriately compensate students who provide input.
- Higher education institutions should gather feedback from faculty and staff to identify campus services that can be adapted to better serve all students.

Higher education institutions should meet students where they are and increase the availability of campus services through flexible hours of operation (weekends or after-hours) and locations (remote and virtual).

Today's students experienced shifts in flexible service models through the COVID-19 global pandemic and continue to navigate full- or

part-time work and caregiving responsibilities along with their academic pursuits. A 2021 survey of 2,000 undergraduate students found that 20 percent wanted expanded hours of student services offices beyond the pandemic.<sup>220</sup> Research suggests that students of color who receive continuous and dedicated support, such as advising and tutoring, will have more positive completion and graduation rates.<sup>221</sup>

To identify ways to serve their students, Weber State University conducted a campus-wide survey and found that the hours of operation of support services — such as tutoring — were too limited, and students often didn't receive the support they needed. In response to their campus needs, Weber State University decided to hire additional staff to work flexible and weekend hours to provide tutoring support services.<sup>222</sup> Higher education institutions such as St. Ambrose University have recognized this need in their student community and as a result have prioritized flexibility in staff schedules, including remote work, to build additional opportunities for students to receive advising or tutoring.

## Enhance mentorship and tutoring programs dedicated to supporting students of color, first-generation students, and students with lower incomes.

# 74

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on the impact of mentorship and tutoring programs on the academic outcomes of students of color, first-generation students, and students with lower incomes.



### Here's what the state government can do:

- State legislatures should provide funding for mentorship and tutoring programs dedicated to supporting students of color, first-generation students, and students with lower incomes.

### Here's what institutional leaders can do:

- Higher education institutions should build and support mentorship programs dedicated to supporting students of color, first-generation students, and students with lower incomes, including connecting them to diverse faculty and professionals.
- Higher education institutions should ensure that information about mentorship programs dedicated to supporting students of color, first-generation students, and students with lower incomes are shared in recruitment materials, catalogs, student handbooks, and on public websites.

Colleges and universities should prioritize programs dedicated to empowering students of color, first-generation students, and students with lower incomes, with guidance and support tailored to addressing barriers faced in higher education — such as access to tutoring. Mentorship programs should also create a sense of belonging by celebrating the cultural and linguistic strengths of students and connecting them to diverse faculty and professionals.

## Offer free, safe, and reliable transportation support services.

# 75

### Here's what the federal government can do:

The U.S. Department of Education and the U.S. Department of Transportation should partner to:

- Collect, conduct, and disseminate research on access to free and low-cost college and university transportation services.
- Collect, conduct, and disseminate research on the impact of free college and university transportation services on student outcomes, particularly for students with lower incomes.
- Issue guidance for higher education institutions on how to conduct a transportation audit, assess campus community needs, and utilize best practices for institutional transportation services.

### Here's what the state government can do:

- State legislatures should require state transportation agencies to partner with higher education institutions to conduct a transportation audit to assess the needs of their campus community.
- State legislatures should provide funding for transportation to support postsecondary students (including both transportation services that are managed with institutions of higher education and public transportation).

**Here’s what institutional leaders can do:**

- Higher education institutions should conduct a transportation audit to assess the needs of their campus community.
- Higher education institutions should offer free public transportation, passes, or gas cards for students to safely and reliably get across the institution, home, and their community.
- Higher education institutions should offer free parking across campus.
- Higher education institutions should allow the use of emergency funding to cover vehicle repairs for students.
- Higher education institutions should ensure that information about transportation support services is shared in recruitment materials, catalogs, student handbooks, and on publicly available websites.

Colleges and universities should commit to careful assessments and create responsive policies to meet the transportation needs of their student community.

Access to reliable transportation is essential for student success, with transportation accounting for 20 percent of the cost of attending college and presenting barriers to class attendance.<sup>223</sup> In 2022, more than 25 percent of college students reported missing class due to lack of reliable transportation to campus.<sup>224</sup> For various reasons, students who attend community college or public higher education institutions are more likely to stay closest to home.<sup>225</sup> College students who are working full-time, caregiving, and have important family/community ties may find it undesirable to attend college far from home.<sup>226</sup> Working college students spend on average 28 minutes, five days a week traveling between home and work.<sup>227</sup> Students who use public transit also experience additional issues, such as the timing and frequency of schedules and inconvenient routes.<sup>228</sup>

**Distance between permanent home address and college, by sector.**

*Students attending community colleges and public institutions stay closest to home.*

	Mean distance	Median distance	Percent within 25 miles	Percent within 50 miles
<b>Community college</b>	54 miles	10 miles	79 percent	89 percent
<b>Public bachelor’s/master’s</b>	82 miles	13 miles	67 percent	79 percent
<b>Private non-profit bachelor’s/master’s</b>	392 miles	75 miles	35 percent	45 percent
<b>Community college</b>	54 miles	10 miles	79 percent	89 percent

*Source: U.S. Department of Education, National Center for Education Statistics, National Postsecondary Student Aid Study: 2020 Undergraduate Students (NPSAS:UG).*

# 76

## Ensure equitable access to technology for all students.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on access to technology for part-time students, students of color, first-generation students, students with lower incomes, and students with disabilities.
- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of guidance on technology accessibility for students with disabilities.
- The U.S. Department of Justice and U.S. Department of Education's Office for Civil Rights should enforce the final rule under Title II of the Americans with Disabilities Act (ADA) to ensure the accessibility of web content and mobile applications for people with disabilities, including in postsecondary educational settings.

### Here's what the state government can do:

- State legislatures should invest in wireless broadband access for students and households with lower incomes across their state.
- State legislatures should require higher education institutions to provide equitable access to technology, such as internet and connected devices, for part-time students, students of color, first-generation students, students with lower incomes, and students with disabilities.

- State legislatures should provide permanent and substantial funding to ensure equitable access to technology in postsecondary institutions, including sufficient resources to institutions in order to remediate digital content to improve accessibility for students with disabilities.

### Here's what institutional leaders can do:

- Higher education institutions should conduct a technology audit to assess the needs of their campus community.
- Higher education institutions should provide equitable access to technology, such as high-speed internet and connected devices, for part-time students, students of color, first-generation students, students with lower incomes, and students with disabilities.
- Higher education institutions should offer readily available and free access to loaner connected devices, such as laptops and hotspots for all students, including part-time students.
- Higher education institutions should provide free technology equipment, such as laptops, to students with lower incomes, including part-time students.
- Higher education institutions should ensure that information about technology resources is shared in recruitment materials, catalogs, student handbooks, and on publicly available websites.
- Higher education institutions should ensure eligible students with disabilities have access to assistive technologies that can remove barriers to learning and make other aspects of student life on campus more accessible.



It is crucial that higher education institutions consider these inequities highlighted during the pandemic and continue expanding upon the resources available to ensure all students on campus have the necessary tools to engage in their learning.

The COVID-19 pandemic shed light on the barriers to technology (e.g., inadequate computer hardware or internet connection) faced by college students, especially students with lower incomes, students of color, and rural students. In 2020, higher rates of technology barriers were reported by students with lower incomes (20 to 30 percent) compared to higher income students (10 to 12 percent), and Black (17 to 29 percent) and Latino (23 to 28 percent) students compared to white (12 to 17 percent) students.<sup>229</sup> Students living in rural areas (14 to 25 percent) also faced more technology barriers than those living in suburban or urban areas (16 to 20 percent). The final rule under Title II of the ADA ensures the accessibility of web content and mobile applications for people with disabilities, including in postsecondary educational settings.<sup>230</sup> The U.S. Department of Education has shared relevant resources on the technology accessibility supports for students with disabilities in higher education.<sup>231</sup>



## Strengthen institutional support services for students with disabilities.

# 77

### Here's what the federal government can do:

- Congress should invest in the National Center for Information and Technical Support for Postsecondary Students with Disabilities, the National Coordinating Center, and the National Technical Assistance and Dissemination Center, all of which provide technical assistance to students with disabilities in college, including students with intellectual disabilities.
- Congress should request a GAO report to make recommendations for how disaggregated higher education data about students with disabilities should be collected and published.
- Congress should enable Pell Grant flexibility and maintain financial aid for eligible students with disabilities who receive an accommodation to reduce their course load to manage their disability.
- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of guidance on technology accessibility for students with disabilities and the ADA final rule for web content and mobile applications.
- The U.S. Department of Education should ensure that higher education institutions have access to and an understanding of [guidance](#) on the civil rights of students with disabilities in postsecondary education.

- The U.S. Department of Education should collect, conduct, and disseminate research on the experiences of students of color with disabilities at all higher education institutions.

#### **Here's what the state government can do:**

- State legislatures should invest resources, such as into a work group, to analyze student data and related outcomes and conduct needs assessments across institutions into areas such as staffing and caseloads within disability services offices and provision of accommodations.
- State legislatures should provide substantial funding for infrastructure and environmental improvements to advance universal<sup>232</sup> accessibility, such as transportation, parking, bathrooms, or other facilities.

#### **Here's what institutional leaders can do:**

- Higher education institutions should ensure that prospective and current students with disabilities have access to guidance on their civil rights in postsecondary education and grievance procedures available on campus to report complaints of discrimination. Guidance should be shared in plain language and understandable to all students.
- Higher education institutions should prioritize campus-wide infrastructure and environmental improvements to advance universal accessibility, such as transportation, parking, bathrooms, or other facilities.

- Higher education institutions should ensure that students with disabilities have access to information on the institution's procedure to request accommodations or academic adjustments.

- Higher education institutions should hire faculty and staff, including professionals of color specialized in serving students with disabilities, to serve as academic advisors and counselors.

- Higher education institutions should provide professional development on the civil rights of students with disabilities, available campus support services, and disability competency.

- Higher education institutions should provide financial support for students with disabilities with lower incomes for evaluations required to document their disability status.

- Higher education institutions should provide accommodations, such as personal attendants and individually prescribed devices for disabled students.

- Higher education institutions should ensure that information about academic adjustments and disability centers are shared in recruitment materials, catalogs, student handbooks, and on public websites.

- Higher education institutions should actively recruit faculty and staff with disabilities.

- Higher education institutions should assess the technology needs of students with disabilities and remediate all web content to be accessible to students with disabilities.

Racism and xenophobia impact the lives of people of color throughout their social, academic, and professional opportunities. For students of color with a disability, these intersections come with additional demands. Through a series of interviews of Black students with disabilities attending an HBCU, those with both visible and invisible disabilities considered their disability as the primary cause of their oppression.<sup>233</sup> Notably, participants also shared that they believed attending an HBCU reduced the negative stigmatization connected with having a disability.<sup>234</sup>

The National Center for Information and Technical Support for Postsecondary Students with Disabilities, the National Coordinating Center (NCC), and the National Technical Assistance and Dissemination Center (NTADC) should have robust funding to provide technical assistance and information to support students with disabilities, including students with intellectual disabilities, as they transition to, or attend, postsecondary education.<sup>235</sup> The final rule under Title II of the ADA ensures the accessibility of web content and mobile applications for people with disabilities, including in postsecondary educational settings.<sup>236</sup> The U.S. Department of Education has shared relevant resources on the technology accessibility supports for students with disabilities in higher education.<sup>237</sup> Students with disabilities should also have access to information and resources provided by the U.S. Department of Education on their civil rights in postsecondary education.<sup>238</sup>

*For more information and resources to improve the lives of people identified with learning disabilities, visit the [National Center for Learning Disabilities \(NCLD\)](#).*

*For more information on research, training, education, and service to promote the quality of life, health, and well-being of people with disabilities, visit [The Association of University Centers on Disabilities \(AUCD\)](#).*

**"Having a disability can be an isolating experience. Having a disability as a Black woman can be a completely different experience, in which you may feel even more isolated and misunderstood. Going to an HBCU was the first time I was able to truly connect with other black women with disabilities. As we began to talk openly, I learned of all the shared experiences and feelings we had that could only be understood by us. For the first time in a long time I felt fully seen and fully understood in this community I was building at my HBCU."<sup>239</sup>**

—Focus group participant

# 78

**Provide language and translation services for students who are dominant in languages other than English.**

**Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate data on the availability of language and translation services available on college campuses.
- The U.S. Department of Education Office for Civil Rights (OCR) should provide guidance on the obligations that institutions of higher education have to provide translation services for students.

**Here's what institutional leaders can do:**

- Higher education institutions should provide language services for students who are dominant in languages other than English.
- Higher education institutions should ensure that information about language services is shared in recruitment materials, catalogs, student handbooks, and on public websites.

More than 5 million English learners (ELs) are enrolled in public P-12 schools possessing the strength of multilingualism. As the nation grows more culturally and linguistically diverse, it is important that higher education institutions incorporate language and translation services in their campus programming to serve students who are dominant in languages other than English.

# 79

**Offer free student housing, at public and private institutions, including community colleges.**

**Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research on the availability of free student housing and its impact on academic outcomes of students with lower incomes, student parents, formerly incarcerated and justice-impacted students, and foster youth.

**Here's what the state government can do:**

- State legislatures should require higher education institutions to develop plans to provide housing to students with lower incomes, student parents, formerly incarcerated and justice-impacted students, and foster youth during and between academic terms.
- State legislatures should appropriate funding for public higher education institutions to provide free housing to students with lower incomes, student parents, formerly incarcerated and justice-impacted students, and foster youth.

**Here's what institutional leaders can do:**

- Higher education institutions should provide free housing to students with lower incomes, student parents, formerly incarcerated and justice-impacted students, and foster youth during and between academic terms.





- Higher education institutions should conduct a housing audit to assess the needs of their campus community and strengthen their existing supports.
- Higher education institutions should ensure that information about housing support programs is shared in recruitment materials, catalogs, student handbooks, and on public websites.
- Higher education institutions should designate liaison staff to support unhoused and foster youth in their access to student support services and community resources.

Earning a college degree without basic needs being met, such as safe housing, is extremely challenging. As the cost of tuition and fees has continued to rise — by almost 5 percent since the pandemic — students with lower incomes face barriers in accessing a place to sleep, shower, study, and live.<sup>240</sup> Fourteen percent of students at two- and four-year higher education institutions have reported that they were unhoused within the last 12 months.<sup>241</sup> Higher education institutions are responsible for understanding the needs of their campus community and helping to meet those needs so that students are better able to persist and complete their degree.

### **Racial disparities persist among college students and access to housing security.<sup>242</sup>**

- **Native American, Black, and Latino students are far more likely to experience basic needs insecurity than their white counterparts.**
- **LGBTQIA+ students are 9 percent more likely than students who are not LGBTQIA+ to experience basic needs insecurity.**
- **The rate of basic needs security among students with experience in the foster care system is 21 percent higher than amongst students with no foster care experience.**



# 80

## Expand access to food security and provide nutritious meals.<sup>243</sup>

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and assess research on the food security of college students.
- Congress should expand the National School Lunch Program to include college students, especially at two-year colleges.

### Here's what the state government can do:

- State legislatures should appropriate funding for higher education institutions to develop and expand access to food security programs.

### Here's what institutional leaders can do:

- Higher education institutions should conduct surveys to assess the food security of students.
- Higher education institutions should develop and expand access to food security programs that are abundant, accessible, and free of stress and stigma.
- Higher education institutions should provide subsidized meal plans.
- Higher education institutions should provide nutritious campus dining options that consider the diversity of the student body.
- Higher education institutions should create protocols for time periods when campus pantries are closed, such as offering grocery gift cards.

- Higher education institutions should ensure that information about food security programs is shared in recruitment materials, catalogs, student handbooks, and on public websites.

Food security is essential for the well-being of all students. Colleges and universities have a responsibility to meet the basic needs of students while they pursue a higher education. Students facing barriers to food security are less likely to get adequate sleep and more likely to report anxiety and emotional distress.<sup>244</sup> In a study on food security among college students, 56 percent of students of color, 67 percent of women, and 46 percent of first-generation students reported very low food security compared to 9.8 percent of U.S. adults.<sup>245</sup>





7

6

5

# Partnerships and P-12 Education Systems

# PARTNERSHIPS AND P-12 EDUCATION SYSTEMS

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The power of building bridges between the P-12 education system lies in the ability to meet students where they are — ensuring that learners have an opportunity to meet their goals well before postsecondary education.

Mentors and tutors often become more than educators: They are role models, advocates, and cheerleaders, celebrating the small victories on a learner's educational journey. Meanwhile, summer bridge, dual enrollment, and early college programs can help ease the transition between key educational stages, equipping students with the confidence and skills necessary to tackle the challenges of the next academic level. Ensuring an equitable pipeline of high quality P-12 preparation is critical to achieving racial equity and diversity in higher education.

As these partnerships and programs flourish, they can level the playing field and cultivate a culture of academic excellence and resilience. Young people learn to see challenges as opportunities for growth. With each hurdle overcome, they build the self-assurance needed to envision themselves as future college students and successful graduates. In essence, such partnerships do not just prepare students for higher education; they can inspire them to reach it, grasp it, and excel within it.

**Invest in Head Start, Early Head Start (EHS), and high-quality early care and education (ECE) programs.**

**81**

**Here's what the federal government can do:**

- Congress should appropriate robust funding for Head Start and Early Head Start (EHS), including Migrant and Seasonal Head Start (MSHS) and American Indian and Alaska Native (AIAN) Head Start.
- The U.S. Department of Health and Human Services should expand income eligibility requirements for Head Start and Early Head Start.

**Here's what the state government can do:**

- State legislatures should appropriate robust funding for Head Start and Early Head Start, including Migrant and Seasonal Head Start (MSHS) and American Indian and Alaska Native (AIAN) Head Start.
- State health agencies should expand income eligibility requirements for Head Start and Early Head Start.





**Here's what institutional leaders can do:**

- Institutions of higher education should create partnerships and provide space for Early Head Start and Head Start centers to operate on or near campus.
- Institutions of higher education should partner with Early Head Start and Head Start programs to support continuing education and job growth for teachers.

All children would benefit substantially from high-quality ECE programs, which serve as a core foundation toward college readiness and educational equity. Research suggests that high-quality ECE programs positively impact long-term outcomes due to the rapid cognitive, social, and emotional skills developed before age 5.<sup>246</sup> According to the National Head Start Association (NHSA):<sup>247</sup>

- Head Start<sup>248</sup> participants are 12 percent less likely to face poverty as adults and 29 percent less likely to receive public assistance.
- Head Start children have greater access to health care and improved physical health over their lifetime.

For more information, see the [Civil Rights Principles for Early Care and Education \(ECE\)](#).

**Here's what the federal government can do:**

- Congress should require the U.S. Department of Education to identify metrics for evaluating whether P-12 systems are adequately and equitably funded.
- Congress should provide robust funding for programs that support students through P-12 public education, including:
  - ◆ Head Start
  - ◆ Title I, Part A of the Elementary and Secondary Education Act (ESEA)
  - ◆ Title II of ESEA
  - ◆ Title III of ESEA
  - ◆ Individuals with Disabilities Education Act (IDEA)
  - ◆ Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP)
  - ◆ Upward Bound and Talent Search (TRIO programs)
  - ◆ Magnet Schools Assistance Programs (MSAP)

**Here's what the state government can do:**

- State legislatures should adequately and equitably fund schools and districts by allocating greater state funding to communities with greater need so that every school has the resources needed to support students in graduating high school ready for college.



The pandemic exacerbated existing inequities in education funding, and during the 2020-21 school year — as P-12 systems required more resources to mitigate unprecedented challenges — 14 states saw decreases in total state and local revenue for education.<sup>250</sup> Schools across the country have yet to recover from these actual or effective budget cuts.<sup>251</sup> Research shows that school spending matters for student outcomes, and increases in school spending lead to higher graduation rates, greater wages, and a reduction in adult poverty, particularly among students from lower income backgrounds.<sup>252</sup> However, there continue to be significant disparities in the distribution of funding and other resources across school districts, with high-poverty schools often receiving less total funding (combined from federal, state, and local sources) than wealthier schools.<sup>253</sup>

An equitable education provided early to all students makes the work of achieving equity and diversity in higher education much easier. Investment in education funding is an urgent issue — for both federal and state policymakers — to address the ongoing barriers faced by the communities and students they serve. Policymakers should invest in the following education programs:

- Head Start<sup>254</sup>
- Title I, Part A of the Elementary and Secondary Education Act (ESEA)
- Title II of ESEA<sup>255</sup>
- Title III of ESEA<sup>256</sup>
- Individuals with Disabilities Education Act (IDEA)
- Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP)<sup>257</sup>

- Upward Bound and Talent Search (TRIO programs)<sup>258</sup>
- Magnet Schools Assistance Programs (MSAP)

Across the country, districts with the most students of color on average receive substantially less (16 percent) state and local revenue than districts with the fewest students of color, and high-poverty districts receive 5 percent less state and local revenue than low-poverty districts. The districts with the most English learners receive 14 percent less state and local revenue, compared with districts with the fewest English learners.<sup>259</sup> These inequitable beginnings burden too many students and hinder their educational dreams.

## Improve the recruitment and retention of a diverse K-12 educator workforce.

# 83

### Here's what the federal government can do:

- Congress should increase funding for Title II of ESEA and appropriate funding for programs that recruit and retain a diverse educator workforce.
- The U.S. Department of Education should support and expand teacher-training programs at Historically Black Colleges and Universities (HBCUs), Tribal Colleges and Universities (TCUs), and Minority Serving Institutions (MSIs).
- The U.S. Department of Education should collect, conduct, and disseminate research on the effectiveness of strategies to recruit and retain a diverse K-12 educator workforce.



- The U.S. Department of Education should annually collect, conduct, and disseminate data on the race and ethnicity of public school teachers and their students.

**Here’s what the state government can do:**

- State legislatures should provide funding for programs that drive the recruitment and retention of a diverse educator workforce.
- State education agencies should collect and analyze data to assess the diversity of educators in their workforce.
- State education agencies (SEAs) and higher education coordinating agencies should strengthen their partnerships to recruit diverse students for their educator preparation programs.

**Here’s what institutional leaders can do:**

- Local education agencies should collect and analyze data to assess the diversity of educators in their workforce.
- P-12 systems should provide professional development to all staff involved in the recruitment and hiring process to recognize implicit bias and build interviewing techniques, which reveal candidate strengths, experience, and knowledge.
- P-12 systems should provide new educators of color with support groups and mentoring provided by trained and qualified colleagues, including other educators of color.
- P-12 systems should provide support to educators of color in their efforts to improve working conditions.

A diverse learning community supports and provides benefits to all students. When schools are more racially and ethnically diverse and positive role modeling occurs, student outcomes improve, teachers and students are more culturally aware, and students hold less implicit biases into adulthood.<sup>260</sup> During the 2017-18 school year, more than 51 percent of K-12 students were students of color, but educators of color comprised just 20 percent of the workforce.<sup>261</sup> Educators of color report facing challenging working conditions, lack of autonomy, discrimination, and fewer opportunities for advancement, which contribute to higher attrition rates than their white peers.<sup>262</sup>

**Improve student access to college and career counseling.**

**84**

**Here’s what the federal government can do:**

- Congress should adequately fund Title II of the Elementary and Secondary Education Act (ESEA) and appropriate funding for programs that train and increase counselor staffing.
- The U.S. Department of Education should collect, conduct, and disseminate research on students’ access to college and career counseling in high school.
- The U.S. Department of Education should collect, conduct, and disseminate research on counselors’ access to training and professional development about the college admissions process.



- The U.S. Department of Education Office for Civil Rights (OCR) should investigate instances where college and career counseling is inequitably available, suggesting possible racial discrimination.

**Here's what the state government can do:**

- State legislatures should set benchmarks and goals to address the counselor shortage and decrease their student-to-counselor ratio, especially in higher poverty schools.
- State legislatures should provide funding for programs that train counselors and reduce ratios.
- State legislatures and education agencies should establish maximum caseloads for high school counselors, with lower ratios at higher poverty schools.

**Here's what institutional leaders can do:**

- Higher education institutions should require high school counselors to complete at least one semester of coursework on college advising.

School counselors are an integral source of college-related social capital<sup>263</sup> for students of color, first-generation students, and students from historically underrepresented communities.<sup>264</sup> Research suggests that students who speak with a school counselor are more likely to apply to multiple colleges,<sup>265</sup> submit the Free Application for Federal Student Aid (FAFSA),<sup>266</sup> and attend a bachelor's degree program following their high school graduation.<sup>267</sup>

**Yet at many high schools, counselors are responsible for advising hundreds of students each year and may lack the capacity to work individually with students to support their postsecondary pathways. Nearly**

**1/3**

**of high school counselors have also reported that they did not receive any training in graduate school about the college admissions process, and an additional**

**32%**

**believe the training they did receive was inadequate.<sup>268</sup>**

**Ensure all public high schools offer the minimum course requirements for admissions in their state system of higher education.**

**85**

**Here's what the federal government can do:**

- The U.S. Department of Education Office for Civil Rights (OCR) should investigate racial disparities in the availability of college preparatory courses as possible evidence of discrimination.



### Here's what the state government can do:

- State legislatures should ensure all public high schools offer the minimum course requirement for admissions in their state system of higher education.
- State legislatures should ensure that state academic standards and graduation requirements align with the entrance requirements for the state system of higher education.
- State legislatures should ensure that higher education institutions eliminate requirements for courses that are not available to all public high school students in their state.

### Here's what institutional leaders can do:

- P-12 systems should partner with higher education coordinating agencies to offer minimum course requirements for admissions in their state system of higher education.
- P-12 systems should provide high school students with information and resources about the minimum course requirements for admissions in their state system of higher education.

State legislatures should ensure greater alignment between P-12 systems and higher education institutions to ensure that minimum course requirements for admissions are offered across all school districts and public high schools. Partnerships should also focus on information sharing and transparency for students to be aware of the minimum courses required for admissions in public higher education institutions.

## Increase access to advanced programs and coursework.<sup>269</sup>

# 86

### Here's what the federal government can do:

- Congress should appropriate funding for programs that address barriers to enrollment and improve student outcomes in advanced courses, including dual enrollment and early college programs.
- The U.S. Department of Education should provide grant funding to prepare more high school educators who are qualified to teach advanced courses.
- The U.S. Department of Education should collect, conduct, and disseminate research on the distribution of and placement in advanced courses.
- The U.S. Department of Education should provide guidance to states and local education agencies (LEAs) to ensure that students of color, English learners, students with disabilities, and students from families with lower incomes have access to advanced courses and improve student outcomes.

### Here's what the state government can do:

- State legislatures should fund programs that address barriers to enrollment and improve student outcomes in advanced courses, including dual enrollment and early college programs.
- State legislatures should fund and provide greater access to scholarships that prepare educators to teach advanced courses.



- State legislatures should require and support districts to expand eligibility for advanced courses.
- State education agencies (SEAs) should collect, conduct, and disseminate research on the distribution of and placement in advanced courses.

**Here’s what institutional leaders can do:**

- Higher education institutions should offer greater access to scholarships that prepare educators to teach advanced courses.
- P-12 systems should:
  - ◆ Offer a greater selection of advanced courses and dual enrollment options.
  - ◆ Expand enrollment in advanced programs and launch new courses.
  - ◆ Implement automatic enrollment and universal screening for advanced courses and programs.
  - ◆ Purchase curriculum and materials for advanced courses.
  - ◆ Cover course and exam fees for students from families with lower incomes.
  - ◆ Offer greater access to tutoring for students from families with lower incomes.
  - ◆ Increase the hiring of educators to teach advanced courses.

Policymakers should ensure that all students who could benefit from advanced courses, regardless of their financial resources, are identified and have the opportunity to participate in programs such as Advanced Placement (AP), International Baccalaureate (IB), and dual enrollment. Students of color who have access to advanced programs, with teachers who receive training and resources, are more engaged in school and can thrive alongside their peers.<sup>270</sup> However, an estimated 225,000 Black and Latino students are missing out on participating in advanced courses that they should have access to while in high school.<sup>271</sup>

**Expand access to summer bridge programs to ease the transition to college and support postsecondary success.**

**87**

**Here’s what the federal government can do:**

- The U.S. Department of Education should offer guidance and technical assistance to schools and local education agencies (LEAs) on creating high-quality summer bridge programs.

**Here’s what the state government can do:**

- State legislatures should appropriate funding for summer bridge programs that support the academic and social transition to college.
- State systems should promote stronger partnerships between universities and P-12 systems to build pre-college programs.





### Here's what institutional leaders can do:

- P-12 systems should build pre-college, college prep, and academic support programs to support learners, particularly students of color and students who have been historically underrepresented.

Summer bridge programs are designed to ease the transition to college and support postsecondary success by providing students with academic and social resources needed to succeed in the college environment.<sup>272</sup>

“Summer melt,” a term described by the National College Attainment Network (NCAN), is “the phenomenon of college-intending students who have applied to, been accepted by, and made a deposit to a college or university but fail to matriculate to that college (or any other) in the fall following their high school graduation.” Every year, an estimated 10-40 percent of high school students, disproportionately students of color, students from low-income backgrounds, and first-generation students, fall through the cracks at this point.<sup>273</sup> High-quality summer bridge programs can help to ensure that students start their college journeys ready for success.

- The U.S. Department of Education should collect, conduct, and disseminate research on the availability of and participation in high-quality dual enrollment.
- The U.S. Department of Education should provide guidance to states and local education agencies (LEAs) to ensure that students of color, English learners, students with disabilities, and students from families with lower incomes have access to dual enrollment programs.

### Here's what the state government can do:

- State legislatures should fund programs that address barriers to enrollment and improve student outcomes in dual enrollment.
- State legislatures should require and support districts to expand eligibility for dual enrollment.

### Here's what institutional leaders can do:

- P-12 systems and higher education institutions should collect, conduct, and disseminate data on student participation and outcomes in dual enrollment. Data should be used to evaluate the effectiveness of dual enrollment programs.
- P-12 systems should:
  - ◆ Offer greater dual enrollment options.
  - ◆ Implement open enrollment and universal screening for dual enrollment.
  - ◆ Purchase curriculum and materials for dual enrollment courses.

# 88

**Increase access to high-quality dual enrollment programs.**

### Here's what the federal government can do:

- Congress should appropriate funding for programs that address barriers to enrollment and improve student outcomes in dual enrollment programs.



- ◆ Cover course and exam fees for students from families with lower incomes.
- ◆ Offer greater access to tutoring for students from families with lower incomes.
- ◆ Increase the hiring of educators to teach advanced courses.

School districts and higher education institutions should also publicly report data on student participation and outcomes, along with evaluating their dual enrollment programs.

High-quality dual enrollment programs offer the same level of rigor as classes taught to college students at two- and four-year higher education institutions, where instructors meet the same expectations and receive appropriate support. Research shows that dual enrollment programs have a positive impact on the college attainment of students with lower incomes.<sup>274</sup>

- The U.S. Department of Education should provide guidance to states and local education agencies (LEAs) to ensure that students of color, English learners, students with disabilities, and students from families with lower incomes have access to early college high schools.

**Here's what the state government can do:**

- State legislatures should appropriate funding for programs that address barriers to enrollment and improve student outcomes in early college high schools.

Early college high schools offer students the opportunity to earn both a high school diploma and an associate degree or college credits simultaneously. These institutions provide students, often from underrepresented communities, with the opportunity to propel their transition into higher education. Studies have shown that early college programs are helpful for all students, but disproportionately so for Black and Latino students.<sup>275</sup>

**89 Increase access to early college high schools.**      **90 Support the transition to higher education for multilingual learners<sup>276</sup> and their families.**

**Here's what the federal government can do:**

- Congress should appropriate funding for programs that address barriers to enrollment and improve student outcomes in early college high schools.
- The U.S. Department of Education should collect, conduct, and disseminate research on the enrollment of students of color at early college high schools.

**Here's what the federal government can do:**

- Congress should increase funding for Title III of the Elementary and Secondary Education Act (ESEA).
- The U.S. Department of Education should prioritize language accessibility in publicly available information on federal financial aid.



- The U.S. Department of Education should share best practices for higher education institutions to prioritize language accessibility in their recruitment, admissions, and enrollment processes.
- The U.S. Department of Education should collect, conduct, and disseminate research on the enrollment and graduation of English learners and multilingual learners (MLLs) in higher education.

**Here's what the state government can do:**

- State legislatures should design and appropriate state funding programs targeted at improving educational outcomes for MLLs in their states.
- State legislatures should identify language(s) and require higher education institutions to prioritize language accessibility in publicly available information on financial aid, recruitment, admissions, and the enrollment processes.
- State legislatures should ensure that regular high school diplomas, advanced courses, and college prep courses and activities are equitably available to MLL students.

**Here's what institutional leaders can do:**

- P-12 systems should increase access to advanced courses and specialized programs for MLLs.
- Higher education institutions should partner with public school districts to build stronger recruitment programs dedicated to MLLs.

- Higher education institutions should make financial aid, recruitment, admissions, and enrollment information publicly available in languages spoken by MLLs in their state.

In order to strengthen their engagement with MLLs and their families, higher education institutions should prioritize language accessibility and break down language barriers encountered during the transition to higher education. More than 5.2 million students in public schools are English learners, accounting for 11 percent of all public K-12 students.<sup>277</sup> Considering the representation of MLLs in the public school systems, public and private colleges should also develop stronger pathways for their success beyond high school.

**Invest in programs that support the success of migrant students.**

**91**

**Here's what the federal government can do:**

- Congress should increase investments in programs that support the preparation and recruitment of migrant students, such as the High School Equivalency Program (HEP) and the College Assistance Migrant Program (CAMP).
- The U.S. Department of Education should ensure that higher education institutions and public high schools have access to technical assistance and an understanding of guidance to apply for funding that support migrant students.



### Here's what the state government can do:

- State legislatures should increase their investment in or establish matching grants for programs that support migrant students.

### Here's what institutional leaders can do:

- Higher education institutions should have dedicated staff and student support services for migrant students.
- Higher education institutions should establish partnerships with migrant serving community organizations in order to support their access to enrollment in higher education.

Congress should increase investments in the High School Equivalency Program (HEP) and the College Assistance Migrant Program (CAMP) to provide greater access to higher education for migrant students across the nation.

- **The High School Equivalency Program (HEP)**<sup>278</sup> supports migrant and seasonal farmworkers who are 16 years of age or older and not currently enrolled in school. HEP supports them to attain a high school diploma, or equivalent, and to gain employment or pursue postsecondary education or training.
- **The College Assistance Migrant Program (CAMP)**<sup>279</sup> supports migrant or seasonal farmworkers who enroll and are admitted on a full-time basis at higher education institutions. CAMP supports students to complete their first academic year.

## Create opportunities for students with disabilities through robust transition programs.

# 92

### Here's what the federal government can do:

- Congress should increase funding for the Individuals with Disabilities Education Act (IDEA), which includes transition services as an allowable use.
- Congress should pass legislation that ensures individuals with disabilities are able to use a previous Individualized Education Program (IEP) or 504 plan as proof of a disability in higher education.
- Congress should improve access to Federal TRIO programs for students with disabilities.
- The U.S. Department of Education should share best practices on supporting students with disabilities through transition programs from P-12 to postsecondary education.
- The U.S. Department of Education should collect, conduct, and disseminate disaggregated outcomes data on students with disabilities in postsecondary education.

### Here's what the state government can do:

- State legislatures should enact legislation that requires institutions of higher education to accept a student's previous IEP or 504 plan as proof of a disability in higher education.
- State legislatures should fund programs that establish robust transition programs for students with disabilities.



- States can leverage other funding sources, such as from the State Vocational Rehabilitation agency (i.e., Pre-Employment Transition Services), to support transition supports and services.

**Here's what institutional leaders can do:**

- Higher education institutions should accept a student's previous IEP or 504 plan as proof of a disability in order to receive services and accommodations.
- Higher education institutions should ensure that prospective and current students with disabilities have access to guidance on their civil rights in postsecondary education and grievance procedures available on campus to report complaints of discrimination.
- P-12 systems should partner with colleges and universities to ensure that students with disabilities have information about academic adjustments, campus supports, and disability centers and ensure equitable access for students with disabilities in dual credit or dual enrollment programs.
- P-12 systems should partner with disability centers at colleges and universities to ensure that students with disabilities have access to information about an institution's procedure to request academic adjustments.
- P-12 systems should partner with disability centers at colleges and universities to provide mentorship to students with disabilities during their transition to postsecondary education.

Robust transition programs into higher education play a pivotal role in supporting students with disabilities. Partnerships between P-12 schools and higher education institutions should include building mentorship programs, education on the civil rights of disabled students, and information sharing about support programs offered on college campuses. Through robust transition programs, schools and higher education institutions can empower students with disabilities and create stronger pathways to accessing higher education. Moreover, documentation barriers persist for students with disabilities, and policymakers at all levels should enact legislation or adopt policies that enable students requesting accommodations to use existing documentation like an IEP or 504 plan, rather than requiring an expensive evaluation. Disabled students should also have access to information and resources provided by the U.S. Department of Education on their civil rights in postsecondary education.<sup>280</sup>



# 93

## Create paid internship opportunities and summer jobs programs for high school students with lower incomes.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate data on students' participation in (and best practices for) paid internship and summer programs disaggregated by race, ethnicity, gender, socioeconomic status, and disability

### Here's what the state government can do:

- State legislatures should commission state workforce agencies to partner with state education agencies (SEAs) and higher education coordinating agencies to establish paid internship and summer jobs programs for students between the ages of 14 and 21 years, particularly those with lower incomes.

### Here's what institutional leaders can do:

- P-12 systems and higher education institutions should provide student support services to build resumes, learn to network, enhance interview skills, offer access to attire, and additional services that can facilitate the process of applying for internships and summer jobs programs.

- Higher education institutions should provide financial support to students with lower incomes to be able to meet their basic needs expenses while participating in internships.

Policymakers should develop stronger partnerships through internships and summer jobs programs that provide students with the leadership development training, life skills, and work-readiness skills to support their transition from high school to postsecondary education and/or career employment. Research shows that internship experiences create pathways to networking, expanded social capital, and direct connections to job offers.<sup>281</sup> Providing greater access to paid internships for traditionally underrepresented students can open opportunities and create pathways to a more diversified workforce.

**Despite the benefits of internship opportunities, high school students from lower income backgrounds are less likely to have access to internships.<sup>282</sup>**

# 94

**Provide high school students with early information about the financial aid for which they are likely eligible.**

**Here's what the federal government can do:**

- Congress should establish categorical eligibility for the maximum Pell Grant for students participating in public benefits, such as TANF, WIC, SNAP, Section 8, and Medicaid.
- The U.S. Department of Education should work with school districts to ensure students have access to information about the amount of financial aid for which they are likely eligible.

**Here's what the state government can do:**

- State legislatures and state higher education coordinating agencies should make aid estimator tools available so that high school students know the state aid that they may be eligible for.

**Here's what institutional leaders can do:**

- Higher education institutions should provide access to the “net price,” not just the “sticker price,” to avoid the disincentivizing effects of high tuition costs.
- Higher education institutions should provide information about support for non-tuition expenses (e.g., subsidized meal plans, housing, books and materials, and transportation) so that students can picture a viable pathway to college.

The astronomical sticker prices presented by many colleges and universities can discourage students from applying, even if they are likely eligible for considerable financial aid. Providing early information about their likely aid eligibility and costs can help to reassure students that higher education is within their reach.

**Create competitive grant programs that incentivize partnerships between P-12 systems and higher education institutions.**

# 95

**Here's what the federal government can do:**

Congress should appropriate funding for competitive grant programs that incentivize stronger partnerships between P-12 systems and higher education institutions, such as:

- High school career and technical education (CTE) programs that are connected to community colleges.
- Professional development for P-12 educators through courses and programs offered at higher education institutions.
- Research collaborations to identify effective strategies to support student outcomes in P-12 systems.
- Programs that address the educator shortage and offer certification programs to increase the number of bilingual educators and educators who provide specialized support for students with disabilities.
- College recruitment programs at Title I public high schools.



- Increased access to college advising at public high schools, including within GED programs.

### Here's what the state government can do:

State legislatures should appropriate funding for competitive grant programs that incentivize stronger partnerships between P-12 systems and higher education institutions, such as:

- High school career and technical education (CTE) programs that open pathways for associate degrees.
- Professional development for P-12 educators through courses and programs offered at higher education institutions.
- Research collaborations to identify effective strategies to support student outcomes in P-12 systems.
- Programs that address the educator shortage and offer certification programs to increase the number of bilingual educators and educators who provide specialized support for students with disabilities.
- College recruitment programs at Title I public high schools.
- Increased access to college advising at public high schools, including within GED programs.

Both P-12 systems and higher education institutions should be encouraged to collaborate and create programs that drive stronger partnerships. Federal and state policymakers can work together to design competitive grant programs that strengthen these partnerships and support students through more robust transitions from P-12 education to college and career.

## Offer no-cost school meals for all P-12 students.

# 96

### Here's what the federal government can do:

- Congress should enact legislation that would make meals free for all children in P-12 education, including during after school programs, without requiring families to apply for free and reduced-price meals.

### Here's what the state government can do:

- State legislatures should enact legislation that would make meals free for all children in P-12 education, including during after school programs, without requiring families to apply for free and reduced-price meals.

To support the nation's well-being, policymakers should ensure that every child has the opportunity to engage in their learning by providing food security and free meals across P-12 education.

Hunger can change a child's developing brain, create barriers to concentrating and learning in school, and negatively impact the opportunity to graduate from high school and transition to postsecondary education.<sup>283</sup> As a result of widespread dietary-related health concerns among Americans, the National School Lunch Program (NSLP) was signed into law in 1946 by President Truman as a "measure of national security to safeguard the health and well-being of the nation's children."<sup>284</sup> Nearly 80 years later, it is long past due for food security to be a promise made to every child in the United States — where one in every five children are unsure of where they will get their next meal.<sup>285</sup> There are currently eight states that ensure access to free meals for all students, including California, Colorado, Maine, Massachusetts, Michigan, Minnesota, New Mexico, and Vermont.<sup>286</sup>





# 97

## Create pathways from high school career and technical education (CTE) to community college associate programs.

### Here's what the federal government can do:

- The U.S. Department of Education should collect, conduct, and disseminate research on best practices for aligning high school CTE curricula and courses to credit equivalence for associate degrees.

### Here's what the state government can do:

- State legislatures should enact legislation to align high school CTE curricula and courses to credit equivalence for associate degrees.
- State legislatures should appropriate funding for grants that cover the cost of high school CTE programs for students from lower income backgrounds.

### Here's what institutional leaders can do:

- P-12 systems should ensure that students have access to information and resources on postsecondary and workforce outcomes for CTE concentrators.<sup>287</sup>
- P-12 systems and community colleges should create partnerships to align CTE curricula and courses offered in high schools to credit requirements for associate degrees.

High quality career and technical education (CTE) courses provide high school students with learning opportunities to build technical and employable skills centered on their career

interests. CTE programs should connect students to postsecondary education — including pathways to associate degrees in community colleges — and be an on-ramp, not an off-ramp, to further education. Considering the lasting impact of student debt on personal and financial goals, P-12 systems should partner with community colleges to build stronger alignment across high school CTE courses and credit requirements of associate degrees.

**After eight years of their expected graduation date, students who focused on CTE courses while in high school had higher median annual earnings than students that did not participate in CTE courses.<sup>288</sup>**

## Award Seals of Bilingualism and Biliteracy on high school diplomas.

# 98

### Here's what the federal government can do:

- Congress should appropriate funding for programs that invest in dual-language programs and multilingual educator training pathways.
- The U.S. Department of Education should issue guidance defining one-way dual-language immersion and two-way dual-language immersion programs.<sup>289</sup>



- The U.S. Department of Education should collect, conduct, and disseminate research on best practices to support multilingual learners (MLLs) through dual-language immersion programs.

#### Here's what the state government can do:

- State legislatures should invest in dual-language programs and prioritize multilingual educator training pathways.
- State legislatures should require higher education institutions to recognize the Seal of Bilingualism as credit equivalent to language courses taken in postsecondary education.

#### Here's what institutional leaders can do:

- School districts should award the Seals of Bilingualism or Bilingualism on high school diplomas.
- Schools should reserve seats for MLLs in dual-immersion programs offered in their native languages.
- Higher education institutions should recognize the Seal of Bilingualism as credit equivalent to language courses taken in postsecondary education.

The nation's foundational strengths lie within its linguistically, culturally, and racially diverse society. Policymakers must work together to cultivate learning opportunities for students to continue growing in their multilingual abilities. The Seal of Bilingualism, developed in 2008 by Californians Together, can be awarded by a school, district, or state to students who have studied and attained proficiencies in two or more languages by high school graduation. All

50 states and Washington, D.C. have adopted a Seal of Bilingualism along with a growing number of school districts that are prioritizing access to dual-immersion programs for their students.<sup>290</sup>

**"Multilingualism is a superpower...As our nation continues to grow more diverse, and as our global economy becomes more interconnected, we cannot seize our nation's full potential to compete and lead the world unless we Raise the Bar and provide all students with opportunities to become multilingual."**

—U.S. Secretary of Education  
Miguel Cardona

For more information, see [Californians Together](#) resources on the [Seal of Bilingualism](#).

# 99

## Improve education outcomes for unhoused students, foster youth, and opportunity youth.

### Here's what the federal government can do:

- Congress should invest in programs that establish or expand initiatives that support unhoused students, foster youth, and opportunity youth<sup>291</sup> in enrolling and graduating from postsecondary education.
- Congress should invest in programs that identify opportunity youth as well as unhoused students in the P-12 system and support their college readiness.
- The U.S. Department of Education and the U.S. Department of Transportation should partner to:
  - ◆ Collect, conduct, and disseminate research on access to reliable transportation for unhoused students and foster youth.
  - ◆ Collect, conduct, and disseminate research on the impact of transportation services on student outcomes, particularly for unhoused students and foster youth.
- Congress should require institutions of higher education to post information on their websites about institutional liaisons responsible for supporting unhoused and foster youth.

### Here's what the state government can do:

- State legislatures should ensure that all districts across their state transfer the credits and graduation requirements of unhoused students and foster youth.
- State legislatures should require counselors who serve unhoused and foster youth to participate in professional development to support their academic outcomes.
- State legislatures should ensure that unhoused and foster youth are eligible for state financial aid and in-state tuition rates.
- State legislatures should require higher education institutions to include voluntary questions in their admissions applications about students' status as unhoused and/or foster youth to contribute to a holistic understanding of a student's educational pathway and offer relevant supports.

### Here's what institutional leaders can do:

- P-12 systems and higher education institutions should recruit and retain unhoused students and foster youth in TRIO and GEAR UP college access programs.
- P-12 systems should provide targeted FAFSA support to students who are unhoused or in foster care.
- P-12 systems should work closely with community organizations serving unhoused and foster youth to support transitions into higher education.



Access to safe, reliable, and stable home and learning environments is essential for the well-being and academic success of all students, including foster youth and unhoused students. All children and students — including the 1.2 million unhoused students in P-12 public schools,<sup>292</sup> the majority of whom are between the grade levels of kindergarten to fourth grade — deserve to be liberated from the constant fear of whether they will have a safe place to sleep at night.<sup>293</sup> Following a 2016 GAO report, the Department of Education and Department of Health and Human Services made a number of resources available to support the transition into higher education for foster and unhoused youth, including the Foster Care Transition Toolkit.<sup>294</sup> Ongoing barriers continue to limit access to financial aid for students who are unhoused.<sup>295</sup>

**Identifying and providing support services long before postsecondary education is critical to supporting the dreams of unhoused students and foster youth.**

**84%** of foster youth say they would like to graduate from college.

**50%** of foster youth graduate from high school. Less than 9 percent will attain a bachelor's degree.

**Source: *Improving Education Outcomes for Foster Youth*, American Bar Association.<sup>296</sup>**

**Support students enrolled in GED programs and their access to college counseling.**

**100**

**Here's what the federal government can do:**

- The U.S. Department of Education should collect, conduct, and disseminate research on students' access to college counseling within GED programs.
- The U.S. Department of Education should ensure that counselors serving students enrolled in GED programs have access to resources and information on college counseling.

**Here's what the state government can do:**

- State legislatures should appropriate state funding to provide greater access to college counseling for students enrolled in GED programs.

**Here's what institutional leaders can do:**

- P-12 systems should ensure that counselors serving students enrolled in GED programs have access to professional development on the college advising and the college admissions processes.
- P-12 systems should provide support services for GED students to build resumes, expand their networks, enhance interview skills, offer access to attire, and additional services to support their pursuit of college opportunities.
- P-12 systems should survey students to assess their basic needs, such as housing, food security, and mental health supports.



→ Higher education institutions should accept GED diplomas in their admissions process.

Since the General Education Development (GED) program began in 1942, more than 20 million people, including many veterans, have earned a GED diploma.<sup>297</sup> GED graduates

should have access to advising and be well informed of all their pathway options, including the ability to apply to college at two- and four-year institutions as well as pursuing career and workforce opportunities. GEDs should play a role in a student's educational journey and not be a finale.



# Conclusion

The policy recommendations identified in ***We Shall Not be Moved: A Policy Agenda to Achieve the National Imperative of Racial Equity and Diversity in Higher Education*** serve as an actionable tool for federal, state, and institutional advocates and policymakers. There is no one policy or approach that will be sufficient to overcome years of unequal educational opportunity. The breadth and depth of this agenda is designed to offer many starting places and paths forward depending on the context of the reader. In offering so many different ideas, we seek to demonstrate how much can be done in spite of recent wins by the opponents of racial progress. Equity and diversity are both possible and necessary. We look forward to working with all allies wherever we find them to move this work forward and create the future we all deserve.





# Endnotes

<sup>1</sup> The title of this document draws from the song “We Shall Not Be Moved,” created by enslaved people in the United States and sung in both religious and secular contexts by advocates for freedom and justice in the Black emancipation movements and labor movements. We owe so much to this song’s authors, whose names history does not record but whose power and brilliance built this nation. We hope to do their dreams and aspirations justice and convey to all that we march onward, no matter the obstacles before us.

<sup>2</sup> Ma, Jennifer, and Matea Pender. *Education Pays 2023*. College Board, 2023. <https://research.collegeboard.org/media/pdf/education-pays-2023.pdf>.

<sup>3</sup> Carnevale, Anthony P., Nicole Smith, Martin Van Der Werf, and Michael C. Quinn. *After Everything: Projections of Jobs, Education, and Training Requirements through 2031*. Georgetown University Center on Education and the Workforce, 2023. <https://cew.georgetown.edu/wp-content/uploads/Projections2031-National-Report.pdf>.

<sup>4</sup> Throughout this document different words are used to describe people who were either born in or are descended from people born in Latin America. In this instance we are using “Latine” because it is gender inclusive. There are many sources for information about the use of various terms, including: Cipriani-Detres. “Hispanic, Latino, Latinx, or Latine? Which One Is It?!” National College Attainment Network. October 5, 2023. <https://www.ncan.org/news/654515/Hispanic-Latino-Latinx-or-Latine-Which-One-Is-It.htm>.

<sup>5</sup> Native American is a political identity based on the relationship between members of sovereign tribes and the U.S. federal government. In this document we have referenced Native American students alongside students from racial groups to acknowledge the ways in which white supremacy has limited Native American students from accessing higher education. Native American students may be of any race. For some important historical context about the ways in which access

to higher education for some came at the cost of sovereignty, self-determination, and land for Native people, see, for example: Goodluck, Kalen, Tristan Ahtone, and Robert Lee. “The Land-Grant Universities Still Profiting off Indigenous Homelands.” *High Country News*, August 18, 2024. <https://www.hcn.org/articles/indigenous-affairs-the-land-grant-universities-still-profiting-off-indigenous-homelands/>.

<sup>6</sup> Affirmative action programs were created through Executive Order 10925 by President John F. Kennedy in 1961 and refers to certain education, contracting, and employment policies that aim to increase the representation of racial and ethnic groups who have been historically underrepresented.

<sup>7</sup> In *Regents of the University of California v. Bakke*, there was no single majority opinion. Four of the justices contended that any racial quota system supported by the government violated the Civil Rights Act of 1964. Justice Lewis F. Powell, Jr. agreed, casting the deciding vote ordering the medical school to admit Bakke. However, in his opinion, Powell argued that the rigid use of racial quotas as employed at the school violated the Equal Protection Clause of the 14th Amendment. The remaining four justices held that the use of race as a criterion in admissions decisions in higher education was constitutionally permissible. Powell joined that opinion as well, contending that the use of race was permissible as one of several admission criteria. Affirmative action policies that relied on race as one of several factors were still legal after the U.S. Supreme Court’s decision in *Bakke*.

<sup>8</sup> “Fisher v. UT Austin.” Legal Defense Fund, October 25, 2023. <https://www.naacpldf.org/case-issue/fisher-v-ut-austin/>.

<sup>9</sup> For more information, see: “Supreme Court’s Affirmative Action Decision, Explained.” NAACP Legal Defense and Educational Fund, Inc., April 11, 2024. <https://www.naacpldf.org/case-issue/sffa-v-harvard-faq/>.



<sup>10</sup> Students for Fair Admissions Inc. v. President and Fellows of Harvard College (U.S. Supreme Court October 2022).

<sup>11</sup> Ross, Janell. “The ‘Infamous 96’ Know Firsthand What Happens When Affirmative Action Is Banned.” TIME, July 1, 2023. <https://time.com/6291241/affirmative-action-infamous-96-ucla-supreme-court/>.

<sup>12</sup> Higher education coordinating agencies, also commonly referred to as state education commissions or state councils, are agencies that provide oversight on the higher education institutions within their states.

<sup>13</sup> The U.S. Department of Education released related information in 2023 on strategies to support diversity and opportunity in higher education. See: “Strategies For Increasing Diversity and Opportunity in Higher Education,” U.S. Department of Education Office of the Under Secretary, September 2023. <https://sites.ed.gov/ous/files/2023/09/Diversity-and-Opportunity-in-Higher-Education.pdf>.

<sup>14</sup> “Inclusive excellence, across the UC experience.” The University of California Equity, Diversity, and Inclusion. <https://diversity.universityofcalifornia.edu/about/mission.html>.

<sup>15</sup> Bleemer, Zachary. “Affirmative Action, Mismatch, and Economic Mobility After California’s Proposition 209,” University of California Berkeley Center for Studies in Higher Education. August 2020. [https://cshe.berkeley.edu/sites/default/files/publications/rops.cshe.10.2020.bleemer.prop209.8.20.2020\\_2.pdf](https://cshe.berkeley.edu/sites/default/files/publications/rops.cshe.10.2020.bleemer.prop209.8.20.2020_2.pdf).

<sup>16</sup> U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS). Characteristics of Postsecondary Students. *Condition of Education*. 2023. <https://nces.ed.gov/programs/coe/indicator/csb/postsecondary-students>.

<sup>17</sup> U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS), 12-month Enrollment component 2021-2022 provisional data. <https://nces.ed.gov/ipeds/TrendGenerator/app/build-table/2/2?rid=5&cid=9>.

<sup>18</sup> “New Measures of Postsecondary Education Transfer Performance: Transfer-out Rates for Community Colleges, Transfer Student Graduation Rates at Four-Year Colleges, and the Institutional Dyads Contributing to Transfer Student Success.” U.S. Department of Education. November 9, 2023. <https://blog.ed.gov/2023/11/new-measures-of-postsecondary-education-transfer-performance-transfer-out-rates-for-community-colleges-transfer-student-graduation-rates-at-four-year-colleges-and-the-institutional-dyads-contributing>.

<sup>19</sup> The Common Data Set does not require higher education institutions to collect and report the number of admitted and enrolled transfer students by institution type and whether they are transferring from a community college or two- or four-year higher education institution.

<sup>20</sup> Common Data Set 2022-2023. Princeton University Office of the Registrar. [https://registrar.princeton.edu/sites/g/files/toruqf136/files/documents/CDS\\_2022-2023.pdf](https://registrar.princeton.edu/sites/g/files/toruqf136/files/documents/CDS_2022-2023.pdf).

<sup>21</sup> Common Data Set 2022-2023. Yale University Office of Institutional Research. [https://oir.yale.edu/sites/default/files/cds\\_yale\\_2022-2023\\_vf\\_10062023.pdf](https://oir.yale.edu/sites/default/files/cds_yale_2022-2023_vf_10062023.pdf).

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<sup>47</sup> Defined as students who have formally registered with the institution’s disability services office.

<sup>48</sup> Changes to IPEDS ADM were finalized in September 2024. The new survey questions will be shared in December 2024. Institutions will be required to complete the new survey questions in December 2025.

<sup>49</sup> Clinedinst, Melissa. “*2019 State of College Admission*,” National Association for College Admission Counseling, June 17, 2024.  
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<sup>51</sup> Ibid.

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<sup>54</sup> Murphy, James. “*The Future of Fair Admissions: Issue Brief 1: Early Decision*,” 2022. <https://edreformnow.org/wp-content/uploads/2022/10/The-Future-of-Fair-Admissions-Report-1-Early-Decision.pdf>. (Source: Common Data Set, 2021).

<sup>55</sup> Svrluga, Susan; & Nick Anderson. “*Columbia Acknowledges Giving Incorrect Data for U.S. News Rankings*,” The Washington Post, September 9, 2022. <https://www.washingtonpost.com/education/2022/09/09/columbia-usnews-college-ranking/>.

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<sup>58</sup> “Four-Year Colleges and Universities Report Over Half of Undergraduate Students Completed Degrees Within 8 Years.” U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, December 12, 2023. [https://nces.ed.gov/whatsnew/press\\_releases/12\\_12\\_2023.asp](https://nces.ed.gov/whatsnew/press_releases/12_12_2023.asp).

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<sup>60</sup> Reber, Sarah; & Goodman, Gabriela. “*Who Uses Legacy Admissions?*” Brookings, March 12, 2024. <https://www.brookings.edu/articles/how-widespread-is-the-practice-of-giving-special-consideration-to-relatives-of-alumni-in-admissions/>.

<sup>61</sup> “*Maryland becomes the third state to completely ban legacy preference in admissions*,” The Hechinger Report, May 1, 2024. <https://hechingerreport.org/maryland-to-become-the-third-state-to-completely-ban-legacy-preference-in-admissions/>.

<sup>62</sup> Knox, Liam. “*Virginia Tech Ends Legacy Admissions and Early Decision*,” Inside Higher Education, August 1, 2023. <https://www.insidehighered.com/news/quick-takes/2023/08/01/virginia-tech-ends-legacy-admissions-and-early-decision>.

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<sup>67</sup> CDS asks colleges and universities to provide the: "Relative importance of each of the following academic and nonacademic factors in your first-time, first-year, degree-seeking general (not including programs with specific criteria) admission decisions. Alumni/ae relation" See: Common Data Set, January 22, 2024. <https://commondataset.org/>.

<sup>68</sup> Reber, Sarah; & Gabriela Goodman. "Who Uses Legacy Admissions?" Brookings, March 12, 2024. <https://www.brookings.edu/articles/how-widespread-is-the-practice-of-giving-special-consideration-to-relatives-of-alumni-in-admissions/>.

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<sup>87</sup> As described in the note provided in the introduction of this resource, DEIA programs and race-conscious policies generally vary in their terms and scope; most programs and services, as well as the recommendations offered in this document, are lawful under federal statutory and constitutional laws. Readers are encouraged to consult with their attorneys for legal advice to understand the rights and obligations of students, faculty, administrators, and greater society.

<sup>88</sup> The College Board’s Landscape tool, for example, provides information about high school location; senior class size; percentage of students eligible for free reduced lunch; average SAT score at colleges attended by students from the high school’s three most recent graduating classes; AP participation and average scores; SAT/ACT high school score averages; neighborhood data on college attendance; and household structure, median family income, housing stability, education level, and crime rates. A study on 43 institutions that participated in the College Board’s Landscape pilot program found that applicants from the most under-resourced schools and neighborhood contexts saw a 5 percentage point increase in probability of admission. Mabel, Zachary; Hurwitz, Michael; Howell, Jessica; Perfetto, Greg. “Can standardizing applicant high school and neighborhood information help to diversify selective colleges?” *Educational Evaluation and Policy Analysis*, September 2022. <https://eric.ed.gov/?id=EJ1347393>.

<sup>89</sup> Lakshmi, Jayaram; Lutz, Amy; & Bennett, Pamela. “Beyond the Schoolyard: The Role of Parenting Logics, Financial Resources, and Social Institutions in the Social Class Gap in Structured Activity Participation,” February 24, 2012. [https://www.researchgate.net/publication/328039672\\_httpjournals.sagepub.com/doi/abs/10.1177/0887302X07303626](https://www.researchgate.net/publication/328039672_httpjournals.sagepub.com/doi/abs/10.1177/0887302X07303626).

<sup>90</sup> “Youth Enrolled in School and Working: Percentage of Youth Ages 16–19 Who Are Enrolled in School and Working by Age, Gender, and Race and Hispanic Origin, 2000–2022.” Child Stats. <https://www.childstats.gov/americaschildren/tables/ed5b.asp>.

<sup>91</sup> College and career advising refers to the process between students and an academic advisor, or counselor, to support them through their educational and career decision-making plans.

<sup>92</sup> Park, Julie; Heseung Kim, Brian; Wong, Nancy; Zheng, Jia; Breen, Stephanie; Lo, Pearl; Baker, Dominique; Rosinger, Kelly; Hoa Nguyen, Mike Hoa Nguyen; & Poon, OiYan. “*Inequality Beyond Standardized Tests: Trends in Extracurricular Activity Reporting in College Applications Across Race and Class*,” April 2023. <https://edworkingpapers.com/sites/default/files/ai23-749.pdf>.

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<sup>94</sup> Williams, Brittani. “*Many Determined College Students Are Also Dedicated Parents: A Preview of the Student Parent Affordability Report*,” The Education Trust, September 22, 2022. <https://edtrust.org/resource/many-determined-college-students-are-also-dedicated-parents-a-preview-of-the-student-parent-affordability-report/>.

<sup>95</sup> Gault, Barbara; Reichlin, Lindsey; & Román, Stephanie. “College Affordability for Low-Income Adults: Improving Returns on Investment for Families and Society,” *Institute for Women’s Policy Research*. April 2014. <https://eric.ed.gov/?id=ED556725>.

<sup>96</sup> The use of “blind” to mean “ignorant” or “unaware” is ableist. We have included the original language to make reference to a commonly used term. For more information about avoiding ableist language, see for example, Ping, Jessica. “Ableist Language To Avoid And Acceptable Alternatives,” <https://therollingexplorer.com/ableist-language-to-a-void-and-acceptable-alternatives-blind-edition/>.

<sup>97</sup> Lakshmi, Jayaram; Lutz, Amy; & Bennett, Pamela. “*Beyond the Schoolyard: The Role of Parenting Logics, Financial Resources, and Social Institutions in the Social Class Gap in Structured Activity Participation*,” February 24, 2012.

<sup>98</sup> We do not advocate for the removal of demonstrated interest shown during the admissions process through applications, such as essays expressing interest and enthusiasm for the institution and participating in interviews.

<sup>99</sup> Dearden, James; Li, Suhui; Meyerhoefer, Chad; & Muzhe, Yang. “*Demonstrated interest: Signaling behavior in college admissions*,” *Contemporary Economic Policy*, February 11, 2017. <https://onlinelibrary.wiley.com/doi/abs/10.1111/coep.12216>.

<sup>100</sup> *Strategies for Increasing Diversity and Opportunity in Higher Education*. U.S. Department of Education Office of the Under Secretary, September 2023. <https://sites.ed.gov/ous/files/2023/09/Diversity-and-Opportunity-in-Higher-Education.pdf>.

<sup>101</sup> As described in the note provided in the introduction of this resource, DEIA programs and race-conscious policies generally vary in their terms and scope; most programs and services, as well as the recommendations offered in this document, are lawful under federal statutory and constitutional laws. Readers are encouraged to consult with their attorneys for legal advice to understand the rights and obligations of students, faculty, administrators, and greater society.

<sup>102</sup> *Plyler v. Doe* is the June 1982 Supreme Court decision that stated it was unconstitutional for states to deny students a free public education on account of their immigration status.

<sup>103</sup> Zong, Jie; & Batalova, Jeanne. “How Many Unauthorized Immigrants Graduate from U.S. High Schools Annually?” Migration Policy Institute, May 11, 2021.

<https://www.migrationpolicy.org/research/unauthorized-immigrants-graduate-us-high-schools>.

<sup>104</sup> “Pell Is Not Enough: Exploring the Experiences of Participants in Second Chance Pell,” October 2022.

[https://cherp.utah.edu/resources/documents/publications/upep\\_brief11.pdf](https://cherp.utah.edu/resources/documents/publications/upep_brief11.pdf).

<sup>105</sup> “Beyond the Box 2023,” U.S. Department of Education Office of Career, Technical, and Adult Education, April 2023.

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<sup>106</sup> “U.S. Department of Education to Launch Application Process to Expand Federal Pell Grant Access for Individuals Who Are Confined or Incarcerated,” U.S. Department of Education, June 30, 2023.

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<sup>107</sup> “State Financial Aid Barriers for Students Impacted By The Justice System,” Commission of the States.

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<sup>108</sup> Ibid.

<sup>109</sup> Holman, Shon; Jackson, Victoria; Taylor, Satra; & Walsh, Brian; “The Promise of a Higher Education Should Be Open to All-Even Those in Prison,” The Education Trust, October 2020.

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<sup>110</sup> Pierson, Emma, et al. “A Large-Scale Analysis of Racial Disparities in Police Stops Across the United States,” *Nature Human Behavior*. 2020.

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<sup>111</sup> Whitmore Schanzenback, Diane et al., “Twelve Facts about Incarceration and Prisoner Reentry,” The Hamilton Project, October 2016.

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