



Renewing the Dream

Improving Financial Aid & College
Affordability for California's
Undocumented Students

March 1, 2023

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Dear Colleagues,

The call to expand and secure college access and affordability for undocumented scholars in California is at a critical juncture. As the state with the largest undocumented student population in the nation, California has led the country in immigrant-inclusive education policy through groundbreaking policies and programs like the nonresident tuition exemption (AB 540) and financial aid programs like the California Dream Act and Dream Act Service Incentive Grant. These reforms have opened the doors to higher education and created opportunity for many undocumented students.

Despite these important strides, California's undocumented student population still faces steep challenges and the release of this report could not be more timely. Twenty years after the enactment of AB 540 and now a decade since the California Dream Act went into effect, there are many lessons to be learned and much for us to do in response to the evolving and unique needs of this resilient student population. The combination of alarming data and recent events requires us to act now — our students cannot wait.

The COVID-19 pandemic undeniably impacted how students consider college enrollment and the personal circumstances in which they make such a decision. At the federal level, undocumented students continue to be barred from receiving federal financial aid or work-study, and the limited and narrowing pool of students who qualify for the Deferred Action for Childhood Arrivals (DACA) program face great uncertainty due to significant legal challenges.

Yet, California's undocumented immigrant population is an integral part of our social fabric, embodying so much of California's rich diversity and culture. The economic and social contributions of undocumented students and their families cannot be overlooked and investing in students is a down payment on California's future success.

Guided by our mission to make postsecondary education affordable for all Californians, the Commission convened the Undocumented Student Affordability Work Group to identify targeted and effective policy interventions to ensure undocumented students have the resources necessary to afford and succeed in college. A diverse group of experts representing campus practitioners, higher education leaders, immigrant rights advocates, and students tackled the most pressing college affordability issues. The findings

of this report shed light on the interconnected web of roadblocks that undocumented students face when trying to access financial aid and higher education. The solutions derived from this work group call on us to leverage a more collaborative, forward-thinking approach to financial aid and strengthen support systems that empower undocumented students and foster their success.

I want to extend my gratitude to the work group members and contributors, Commissioners, and Commission staff for their participation, insight, and steadfast commitment to this important endeavor. I want to also thank the College Futures Foundation, for their generous support throughout this process and The Raben Group, for their partnership in facilitating this leading edge work.

It is my hope that this report serves as a catalyst for the creation of a more proactive, inclusive, streamlined, and collaborative financial aid and higher education system for undocumented scholars. Undocumented scholars in California have already experienced tremendous educational success against all odds, and are fulfilling critical workforce needs. We must continue to build on this record, for both their economic futures and that of our state.

Sincerely,



Marlene L. Garcia
Executive Director
California Student Aid Commission

Acknowledgments



This project was possible thanks to the generous support of the College Futures Foundation and the assistance of the Foundation for California Community Colleges in helping to facilitate such a partnership. In addition to the many work group participants, immigration experts participated in interviews, and students joined focus group discussions. Additionally, we would like to thank The Raben Group for their collaboration in managing the work group and drafting the report. We would also like to thank Erik Ramirez, Marisela Hernandez, Shawn Brick, Nancy Jodaitis, Patricia Jiménez de Valdez, María Blanco, Vikash Reddy, and Diana Hernández Banderas for their generous review and feedback on the report as it was being drafted.

Nothing contained in this report represents the endorsement of any individual or organization that participated in the work group.

Executive Summary

California has long been at the national forefront of advancing policies that help ensure the dream of a college education remains accessible and affordable to all students, regardless of their immigration status. This is particularly true when it comes to California's undocumented student population enrolled in postsecondary education, which at close to 100,000 students, is the largest in the country.¹

The state's commitment to undocumented students began in 2001, when California's legislature and Governor approved landmark legislation, AB 540.² This historic legislation made many of California's undocumented students eligible for in-state college tuition, opening the door to higher education for generations of students. That commitment was reinforced and expanded in 2011, when California enacted legislation to offer state financial aid to eligible undocumented students through the California Dream Act.³ Since then, subsequent state legislation has expanded access to in-state tuition and other forms of state financial aid.

These groundbreaking policies, powered by students, immigrant rights organizations and higher education advocates, and administered by campus counselors and advisors, signaled that California values the talent and promise of undocumented students and recognized these students as vital to California's ability to thrive economically and its future workforce.



Against all odds, countless undocumented scholars have successfully navigated California's higher education system and financial aid process and have experienced tremendous success. As some of California's most entrepreneurial and talented individuals, these students have gone on to become doctors, teachers, lawyers, researchers, scientists, and more. They have overcome numerous obstacles in their pursuit of a higher education and reflect the strong immigrant work ethic and talent on which this country has been built.

Yet, despite this significant progress, 20 years after AB 540 was signed into law many undocumented students still face significant barriers when it comes to accessing financial aid, and college remains unaffordable for California's most vulnerable students.

More than half of California's undocumented students in postsecondary education (53 percent) do not fill out a California Dream Act Application (CADAA), the counterpart to the Free Application for Federal Student Aid (FAFSA) which is used to determine financial aid eligibility and administer state aid for undocumented students.⁴

According to 2021–22 CSAC data, among undocumented students in postsecondary education who do fill out a CADAA, only 30 percent ultimately enroll and receive state financial aid. And overall, only 14 percent of California's estimated undocumented student population in postsecondary education receives financial aid to support their higher education goals.⁵

This is alarming because undocumented students pursuing a college education have lower incomes and would otherwise be eligible for financial aid. In fact, 55 percent of CADAA filers have a \$0 expected family contribution (EFC), compared to 40 percent of California's FAFSA filers.⁶ Excluded from receiving any type of federal financial aid, undocumented students are expected to navigate higher education with a significant financial burden.

For all of these reasons, the California Student Aid Commission (CSAC) sought to clearly identify the unique challenges confronting undocumented students in California and put forth concrete recommendations for how California's higher education leaders and policymakers can help undocumented students to successfully navigate the financial aid process and pursue a debt-free college education.

CSAC convened a work group comprised of individuals from all segments of California's higher education system and diverse higher education stakeholders to invite their input regarding the obstacles that undocumented students face in accessing financial aid, and ideas for addressing those needs. Additionally, CSAC hosted a focus group with undocumented college students and interviewed legal and immigration experts.

This report is the culmination of the work group's comprehensive examination of the challenges facing undocumented students as they navigate state financial aid, and offers higher education leaders, policymakers and campus practitioners targeted recommendations to support undocumented students in successfully accessing financial aid and pursuing debt-free college in California.

Financial Aid and College Affordability Challenges

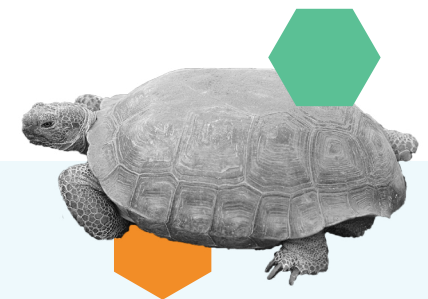
Information and Outreach

The challenges undocumented students confront in accessing financial aid arise early on when students are in high school. Students often have limited access to or receive inaccurate information about their financial aid options.

- ⊘ **FINANCIAL AID INFORMATION SESSIONS OFTEN ONLY COVER FAFSA** with little focus on CADAA, and high school counselors lack the support and resources needed to adequately advise and guide undocumented students on financial aid.
- ⊘ **PROVIDING PERSONAL INFORMATION REQUIRED IN THE APPLICATION PROCESS** can create anxiety for undocumented students and their families, given their immigration status, and sometimes deters undocumented students from applying for college or financial aid altogether.

Navigating the Application Process

- ⊘ **UNDOCUMENTED STUDENTS HAVE TO FILL OUT MULTIPLE APPLICATIONS** (i.e., CADAA, AB 540 affidavit, Promise Grant) that are processed by different entities, which creates extra hurdles and confusion for students, and discourages some from seeking additional aid.
- ⊘ **THE CADAA INCLUDES MANY QUESTIONS** that are duplicative, confusing, or not applicable to undocumented students, making the application process cumbersome.
- ⊘ **THE PROCESS FOR VERIFYING THAT STUDENTS ARE ELIGIBLE FOR AB 540 STATUS VARIES** across higher education segments and even between campuses, making it difficult for students to know what is required of them to become exempt from paying nonresident tuition. This is especially challenging for undocumented transfer students who have to go through this process at each campus they attend.



Campus Resources and Support

- ⊘ **FINANCIAL AID OFFICERS AND ADMISSIONS OFFICERS ARE NOT ALWAYS TRAINED** and resourced to address the unique needs of undocumented students or up to date on evolving financial aid changes pertaining to these students, leaving a void for students seeking advice on the status of their financial aid application and awards.
- ⊘ **THERE IS A LACK OF COORDINATION** amongst various departments on campus in addressing the needs of undocumented students, causing students to feel like they are being shuffled around without clear direction on where they can obtain assistance.



Receiving Financial Aid

- ⊘ **STUDENTS RECEIVE MINIMAL INFORMATION** about the various aid options for which they are eligible, causing them to miss potential financial aid opportunities. For example, many community college students receive a tuition waiver but no information about Cal Grant, a significant financial aid resource.
- ⊘ **STUDENTS MIGHT HAVE THEIR AID DELAYED OR ENTIRELY DENIED** due to application issues of which they were not even aware.
- ⊘ **SOME STUDENTS ARE OFFERED LOANS** to offset the lack of federal aid. Heavy loan debt is incompatible with the state's goal of having debt-free college, especially considering that loans offered to undocumented students through the DREAM Loan Program are currently not eligible for the same loan forgiveness opportunities as their peers.



College Affordability

Underlying these challenges, undocumented students are barred from federal financial aid and many lack work authorization. These limited options are often a deterrent from attending college altogether.

- ⊘ **THE LACK OF FEDERAL FINANCIAL AID, ESPECIALLY IN THE FORM OF PELL GRANTS,** which will reach a maximum award of \$7,395 in the 2023–24 academic year, makes college unaffordable for many undocumented students, the majority of whom are of low-income backgrounds and who would otherwise be eligible for such forms of aid.
- ⊘ **MANY UNDOCUMENTED STUDENTS DO NOT QUALIFY FOR CRITICAL SAFETY NET PROGRAMS,** like CalFresh or the California Food Assistance Program (CFAP), which can provide over \$200 a month for a single person, at a time when food and housing insecurity amongst college students is rising.
- ⊘ **UNDOCUMENTED STUDENTS WITHOUT WORK AUTHORIZATION HAVE LIMITED ACCESS** to career-relevant and sustainable work opportunities during college and after graduation.



STUDENT STORY



Being an undocumented individual has impacted every aspect of my life, and as a young student, navigating the system was difficult. Growing up, college was a dream that I did not see as a viable opportunity due to the financial cost and my status. As I began high school, I was fortunate to have a great counselor who changed the trajectory of my life by providing immense support and resources. The concern that plagued me the most was the cost of attending a university. Financial aid meant everything to my family and me. I would not be able to attend university, much less UC Berkeley, if it weren't for the aid I received through the CA Dream Act, institutional scholarships, and outside scholarships. Thanks to financial aid, I accomplished going to my number one choice school and being debt free. This past year I graduated and began the Capitol Fellows Program as an Executive Fellow. I aim to work in public policy and bring positive change to marginalized communities. Although the same fears continue to manifest, I have a strong community and support system guiding me through these barriers; without them, I would not be here today."

— **UC BERKELEY GRADUATE, 2022**

Addressing Financial Aid and College Affordability Challenges

Addressing the financial aid and college affordability challenges that undocumented students in California face is imperative to achieving California's promise of offering a debt-free college education to *all* students, and California's commitment to closing ethnic and racial disparity gaps in college attainment. There are multiple stakeholders who can help undocumented students better access financial aid in California and help address the financial burden placed on these students due to their immigration status.



Administrative Changes and Recommendations

As the administrator of CADAA, CSAC can make direct administrative changes to the application itself to simplify the process and improve the experience of undocumented students, such as:

- **SIMPLIFY AND STREAMLINE THE CADAA** by assessing the questions on the form, incorporating visual aids for tax questions, making the parental/guardian signature a one-step process, and revising language to be less confusing, and potentially shorter.
- **ESTABLISH AN OPT-IN PROCESS FOR CADAA FILERS** so they can consent to receiving text messages from CSAC about their financial aid status and opportunities.
- **UPDATE THE CADAA WEBSITE** so that it is easier to navigate, alerts users about incorrect information in order to help students troubleshoot, and provides a centralized portal with a library of virtual training modules and resources for administrators and students.
- **ENHANCE STUDENTS' ABILITY TO RECEIVE DIRECT AND PROMPT ANSWERS** to their questions about the CADAA or eligibility for other state-based aid by exploring opportunities to improve CSAC's student call center operations.
- **REDUCE THE PERCENTAGE OF MANDATED CADAA** applications randomly selected for verification to better align with recent federal verification process changes.
- **PROVIDE THE COMMISSION WITH ADDITIONAL RESOURCES** to create and staff a centralized CADAA verification submission process, which uses the online CSAC portal, to ensure that applicants know exactly what will be asked of them to complete the process.



Campus Changes and Recommendations

California's universities and colleges can make changes, both in terms of how campus departments coordinate and partner to support undocumented students and how they streamline application and disbursement processes for students. Specifically, they can:

- **IMPROVE AND STREAMLINE COORDINATION** between various campus departments to ensure staff are knowledgeable about the financial aid options available to undocumented students. This can help students successfully navigate the financial aid process, and enable campus staff to share best practices on how to serve undocumented students.
- **EXPLORE CASE MANAGEMENT MODELS** where an individual or team of individuals help undocumented students navigate the financial aid process until they receive their awards, and help connect students to additional resources they might need.
- **WORK WITH STUDENTS TO PURSUE SCHOLARSHIP OPPORTUNITIES** or other funding sources — such as institutional aid — that can help backfill some of the aid undocumented students do not receive, either because they are not eligible for federal aid or because they have exhausted all aid options available to them before turning to loans, or worse, credit cards.





State Policy and Legislative Recommendations

State policymakers can champion innovative legislation to expand and strengthen financial aid opportunities available to undocumented students moving forward. Specifically, they could:

- **AUTHORIZE CSAC TO EMBED THE AB 540 AFFIDAVIT** into the CADAA, so that students only need to submit a single form through a single entity. CADAA submission data can be used by campuses to establish AB 540 status and Promise Grant eligibility.
- **ENSURE THAT UNDOCUMENTED STUDENTS ARE ELIGIBLE** for state safety net programs, such as housing and food assistance. When establishing these programs, legislators must ensure they accommodate student needs and do not replicate barriers that exist at the federal level.
- **CREATE A STATE-FUNDED GRANT** that can offset the financial burden undocumented students absorb because they are not eligible for the federal Pell Grant.
- **UPDATE THE DREAM LOAN PROGRAM**, so that students who receive this type of aid can become eligible for the same loan forgiveness or debt forgiveness programs as their peers, and to ensure that interest rates for DREAM loans remain low.
- **EXPLORE AVENUES FOR EXPANDING OPPORTUNITIES** for undocumented students who graduate with a college degree to obtain state work authorization, such as the recent proposal by the *Opportunity for All* campaign, making the case for state entities to hire undocumented students.
- **CONSIDER LEGISLATION OR BUDGET ACTIONS** to ensure California's undocumented students are able to reliably attain their AB 540 status, including reducing the number of years of school attendance required for such status.
- **PARTNER WITH CALIFORNIA'S COLLEGES AND UNIVERSITIES** to create opportunities for undocumented students to participate in fellowship programs and other paid opportunities during college, as a way to expand aid sources while investing in students' professional development.



STUDENT STORY



Federal Policy Recommendations

California’s higher education leaders and elected officials can use their platforms and voice to make the case at the federal level for policies that can open federal financial aid to undocumented students and provide them with a path to adjustment of status, including policies that could:

- ❑ EXPAND PELL GRANT ELIGIBILITY for undocumented students.
- ❑ INCLUDE UNDOCUMENTED STUDENTS IN FEDERAL EFFORTS to extend work authorization and legal protections via H1-B visas to international students.
- ❑ PASS COMPREHENSIVE IMMIGRATION REFORM, including adoption of a federal Dream Act for qualifying students to be able to more fully and securely contribute to our nation’s economy.



I was born in Oaxaca, Mexico and, for most of my life, I identified as a DREAMer. Twenty two years ago, my parents decided to migrate to the United States so their children could live better lives. After immigrating to the US at the age of 6, my parents enrolled me into public school in Selma, California.

After graduating in 2013, I went on to pursue higher education at Fresno Pacific University as a first-generation student. One of the most valuable benefits I had during my educational journey was the opportunity to apply to the CA Dream Act, which gave me access to a Cal Grant and helped cover most of my remaining undergrad tuition. The Dream Act also made me eligible for other local scholarships, which required completing the CA Dream Act / FAFSA.

With the financial support I received through the CA Dream Act, I was able to focus on my studies without an immense burden of how I would offset the costs of my tuition. Although I still spent many summers working in packing houses and picking up overnight shifts as a server to pay for other costs such as books, gas, and meals; not having to worry about generating thousands of dollars to pay for tuition was a relief.

In May 2020, I completed my master’s in education at California State University, Fresno. Since then, I have had the privilege of working with the University of California, San Francisco — Fresno under the Latino Center for Medical Education and Research department. I serve as the assigned Academic Program Coordinator for Caruthers Unified School District. My goal is to continue being a strong advocate for my community and invest in future generations so that they too can excel in their education.”

— **FRESNO PACIFIC UNIVERSITY GRADUATE
2023 & CSU FRESNO GRADUATE**

Executive Summary Endnotes

1. Immigrants in California, 2019, <https://www.ppic.org/publication/immigrants-in-california>
2. While AB 540 has enabled thousands of undocumented students to pursue higher education, it is important to also note that this pathway to exemptions from nonresident tuition rates is also available to U.S. citizens; “AB 540 student” is often used synonymously with “undocumented students,” but in fact includes other students that meet criteria and are seeking more affordable tuition rates.
3. Assembly Bill 131, http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0101-0150/ab_131_cfa_20110621_121323_sen_comm.html
4. 2021–22 California Student Aid Commission Data
5. 2021–22 California Student Aid Commission Data
6. 2021–22 California Student Aid Commission Data



Background

California is home to almost 11 million immigrants, more than any other state in the country.⁷ Over 2 million of these Californians are undocumented and California's college-age undocumented population is close to 100,000 students. Long a source of strength for the state, immigrants are vital contributors to the state's workforce and economy. Equally important, immigrant cultures and perspectives are integral to California's innovative and forward-thinking spirit.

In order to understand the challenges and opportunities that exist for California to support undocumented students pursuing higher education, it is important to first establish the context surrounding the state's undocumented student population.



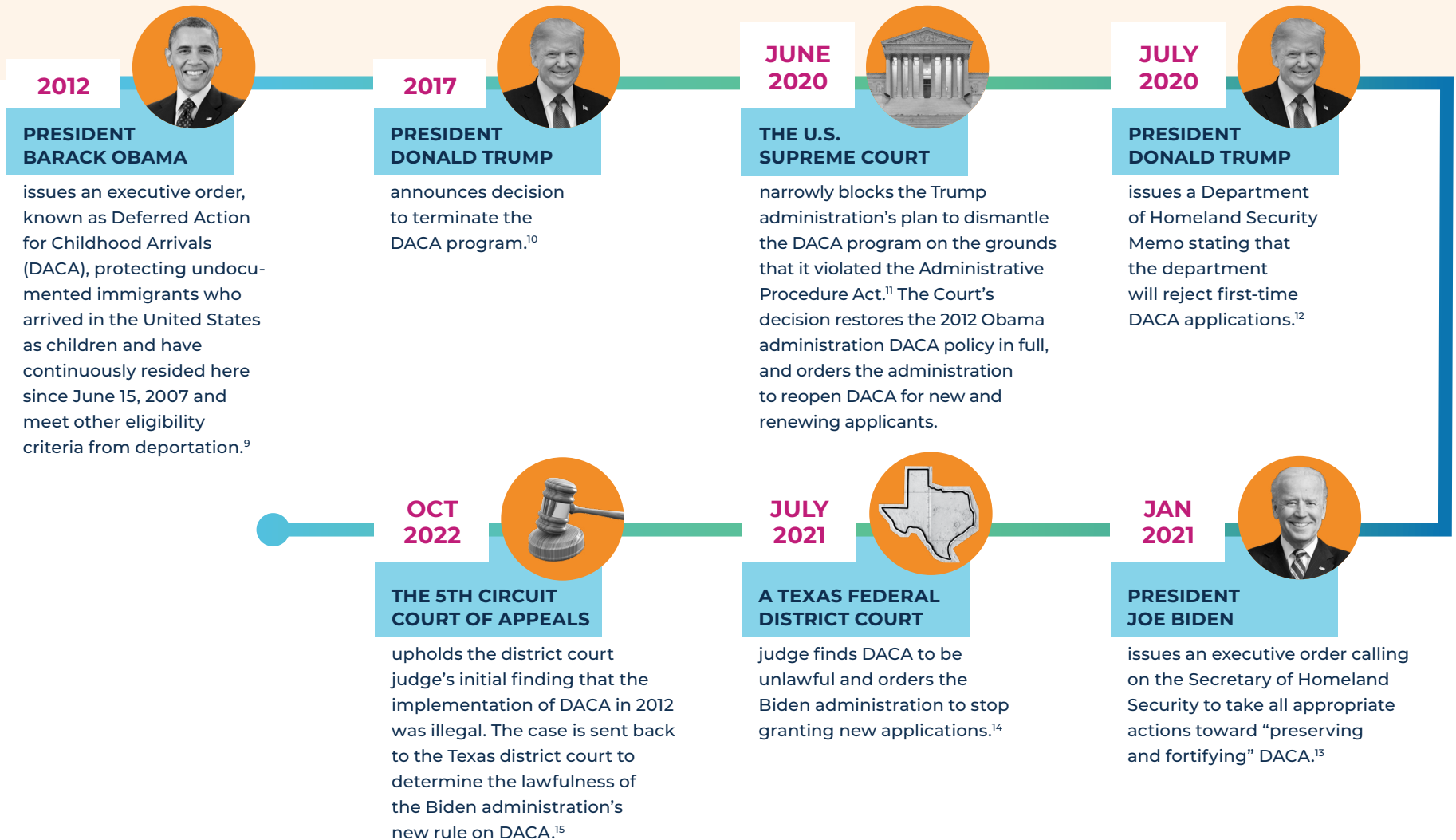
Definition of Terms

- **Undocumented Students:** Students who reside in the United States without legal status.
- **Undocumented Students with DACA:** Students who have been granted work authorization and temporary reprieve from deportation through the federal government's Deferred Action for Childhood Arrivals (DACA) program.
- **Undocumented Students without DACA:** Students who do not have the protections of DACA. They are 'at-risk' for being targeted by immigration enforcement and lack work authorization.
- **Students from Mixed-Status Families:** Students living in households with family members who have different citizenship or immigration statuses.
- **AB 540 Students:** Undocumented, immigrant, and other students (including U.S. citizens) who are exempted from paying nonresident tuition and fees at public colleges and universities, as well as able to apply for state financial aid through the California Dream Act Application.

Federal Landscape

Given the federal government's jurisdiction over immigration policy, there are a number of federal laws and policies that directly impact California's undocumented student population. Federal law excludes undocumented students from receiving federal financial aid, obtaining work authorization, and makes them vulnerable to deportation.

However, close to 200,000 undocumented Californians received temporary relief from deportation and were granted work authorization when the Obama administration established the DACA program through executive action in 2012.⁸ DACA gave many undocumented students the opportunity to work to help finance their higher education. Yet, subsequent legal challenges have created a greater level of uncertainty around the future of DACA, as illustrated in the timeline below.



DACA was enacted as a temporary solution to protect a small segment of the immigrant population. While the program has undoubtedly provided relief and unlocked opportunities for many undocumented young people in this country, it was never broad enough, nor was it intended to be a substitute for comprehensive immigration reform. **The lack of federal action over the past decade, however, has accelerated the need for states to step in to support undocumented students.** A growing number of undocumented students entering college are ineligible for DACA and do not have work authorization. According to FWD.us, an estimated 100,000 undocumented high school students will graduate from a U.S. high school each year without immigration relief.¹⁶ Additionally, FWD.us estimates that California would be the state with the highest number of job losses (6,000 per month) if DACA were to end.¹⁷ This creates a new level of urgency for California to respond and ensure incoming undocumented students can access an affordable college education.

Current Financial Aid Opportunities for Undocumented Students in California

Ten years before President Obama created the DACA program, California had already taken steps to expand higher education opportunities for undocumented students, and since then has enacted several groundbreaking laws that have made college more accessible and affordable for undocumented students.

Currently, California offers a range of financial aid opportunities to undocumented students enrolled in its higher education system. As seen in Figure 1, the availability of these aid opportunities to undocumented students varies depending on their residency status and whether they have successfully submitted a CADAA. Undocumented students who have established AB 540 status are eligible for in-state tuition only, but if they also submit a CADAA they can become eligible for state financial aid.

Institutional Aid Opportunities

California's higher education institutions also offer their own aid opportunities. Students who have verified their residency and have submitted a CADAA are considered for all of these grants and programs. However, undocumented students with AB 540 status but who do not file a CADAA might only apply for Promise Grants (CCPG) and EOPS grants if they're attending a California community college.

- **UC Grants and Scholarships:** are awarded to students who demonstrate financial need and/or merit.
- **CSU Grants and Scholarships:** provide need-based tuition/fee awards to eligible undergraduate and graduate or post baccalaureate students.
- **CSU and UC Educational Opportunity Program (EOP):** provides admission, academic and financial support services to low-income, first generation, and students from historically disadvantaged backgrounds.
- **California College Promise Grant (CCPG):** waives enrollment fees for students at California Community Colleges who meet a means test.
- **Extended Opportunity Program and Services (EOPS):** a supplemental support services program designed to assist qualified low-income and educationally disadvantaged students in completing their education goals. Services include but are not limited to academic counseling, tutoring, and university transfer assistance.
- **California DREAM Loan Program:** provides eligible AB 540 students with the option to borrow loans to help cover the cost of attending a UC or CSU; by January 1, 2024, these loans must mirror the loan forgiveness options in the federal Perkins Loan Program.
- **Institutional Grants at Private Non-Profit Institutions:** some private non-profit colleges and universities offer grants to undocumented students. Award amounts and eligibility vary by campus.

California Reforms Expand Higher Education Opportunities for Undocumented Students

2001

AB 540

Assembly Bill 540 (AB 540) exempts any student who completed at least three years at a California high school from paying nonresident tuition, allowing them to instead pay in-state tuition.¹⁸

2011

AB 130 & 131

The California Dream Act (AB 130 and AB 131) enables undocumented students who meet eligibility requirements under AB 540 to receive state financial aid (like Cal Grants) and other institutional aid through public universities. This landmark policy led the California Student Aid Commission to establish the California Dream Act Application (CADAA).^{19 20}

2012

AB 1899

Assembly Bill 1899 (AB 1899) extends eligibility for residency, for tuition/fee purposes and student financial aid programs, to noncitizen victims of trafficking, domestic violence and other serious crimes.²¹

2014

AB 2000 & SB 1210

Assembly Bill 2000 (AB 2000) expands AB 540 to include students who graduated early from a California high school with three or more years of credits; Senate Bill 1210 (SB 1210) establishes the DREAM Loan program to provide affordable borrowing opportunities for AB 540 students at public universities.^{22 23}

2022

SB 1141

Senate Bill 1141 (SB 1141) further expands access to AB 540 by removing a limitation on the years of community college enrollment that count towards fulfilling AB 540 requirements.²⁴

2019

DSIG

Through the 2019–20 State Budget Act, California extends eligibility for Competitive Cal Grants to California Dream Act filers and establishes the Dream Act Service Incentive Grant (DSIG) program, allowing eligible CADAA students that perform a specified number of community or volunteer service hours to receive a grant. Due to the COVID-19 pandemic, DSIG's implementation was delayed until the summer of 2021 and funding was repurposed to support emergency aid for AB 540 students.²⁵

2018

AB 1895

Assembly Bill 1895 (AB 1895) requires that income-based repayment options consistent with those available to federal student loan borrowers be provided to students that utilize a DREAM Loan.²⁶

2017

SB 68

Senate Bill 68 (SB 68) expands the requirements of AB 540 / AB 2000 to include attendance at California Community Colleges (CCCs) and attainment of an associate's degree.²⁷

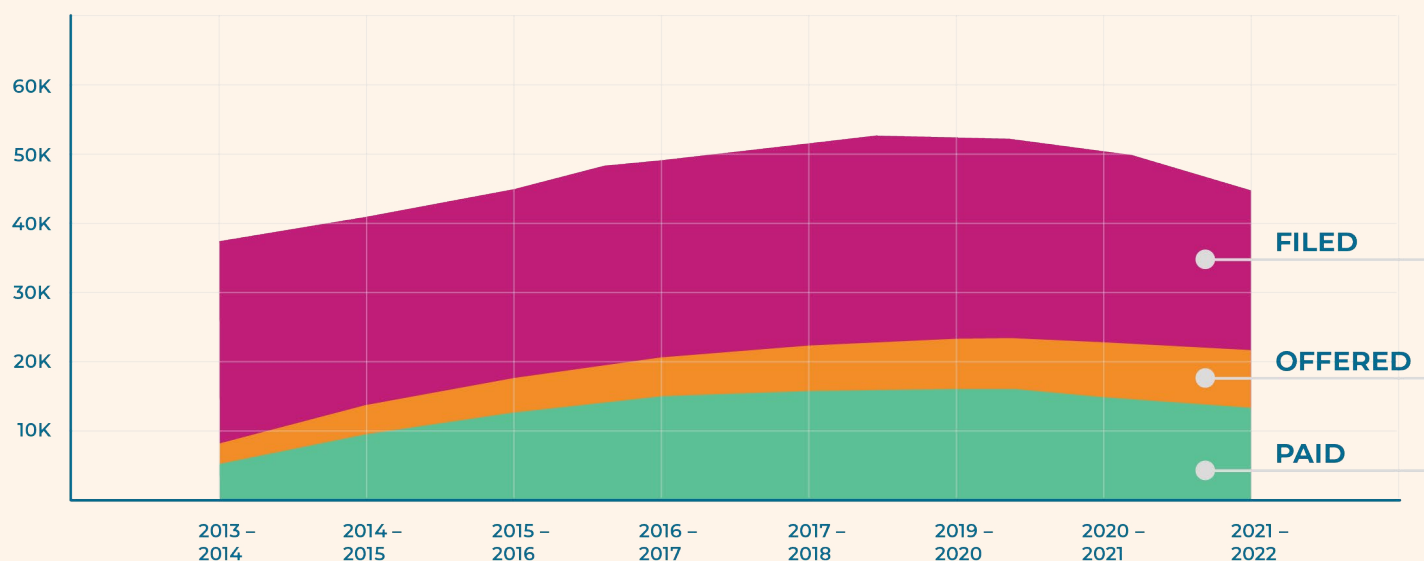
Figure 1.
CA State & Private Financial Aid Opportunities

| | UNDOCUMENTED STUDENTS | | |
|-----------------------------------|--|---|---|
| | without AB 540 status ineligible to file a CADAA | with AB 540 status who have not filed a CADAA | with AB 540 status who have filed a CADAA |
| FAFSA | ✗ | ✗ | ✗ |
| In-State Tuition | ✗ | ✓ | ✓ |
| Cal Grants | ✗ | ✗ | ✓ |
| Chafee Grant | ✗ | ✗ | ✓ |
| Middle Class Scholarship (UC/CSU) | ✗ | ✗ | ✓ |
| Private Scholarships | Varies | Varies | Varies |
| Private Loans | Varies | Varies | Varies |

In addition, California offers programs that award grants or stipends to eligible students for their commitment to service or, in some instances, their labor.

- **Dream Act Service Incentive Grant (DSIG):**²⁸CSAC awards AB 540 eligible students, who also complete a CADAA and meet certain Cal Grant eligibility requirements, an award of up to \$4,500 per academic year for community or volunteer service for up to eight semesters.
- **College Corps:**²⁹ CalVolunteers awards up to \$10,000 to students at participating colleges and universities, including qualifying undocumented students, to engage in service work in the areas of climate action, K-12 education, and food insecurity.
- **Learning-Aligned Employment Program (LAEP):**³⁰ Public colleges and universities offer eligible students, including qualifying undocumented students with work authorization, the opportunity to generate income while gaining education-aligned, career-related employment.

Figure 2.
Total California Dream Act Applications, 2013–14 to 2021–22



Critical Gaps in Accessing and Receiving Financial Aid

California’s groundbreaking reforms have opened the possibility of attending college and transformed the lives of thousands of undocumented students in California. But for many undocumented students in California, the pursuit of higher education still poses serious financial challenges.

According to a 2019 report by The Campaign for College Opportunity, undocumented students experience significant financial aid gaps, the education cost borne by students accounting for student earnings, parental contributions, and grant aid.³¹ **Because undocumented students are unable to access federal financial aid, these gaps can range from \$14,369 to \$24,667, and have likely risen since 2019.**³²

Lacking access to federal financial aid or work authorization, undocumented students clearly benefit from state financial aid. Yet, 2021–22 CSAC data show that the **majority (53 percent) of the estimated 94,030 undocumented students in California did not even apply for financial aid through the CADAA.**³³ And the number of students applying for CADAA has declined. **CADAA applications for the 2022–23 academic year decreased by 26 percent, relative to the 2020–21 year, compared to an 8 percent dip in FAFSA submissions** (See Figure 2).

Of the 44,381 undocumented students who filed a CADAA, 52 percent were not offered a state financial aid award. Of those that were eligible and offered aid, 39 percent did not receive, or get their state aid disbursed. Overall, only 14 percent of the total estimated undocumented student population in California received financial aid to support

their higher education goals, and **only 30 percent of total initial CADAA applicants were eligible for state aid and made it through the end of the process** (See Figure 3).

A comparison of first-time CADAA applicants with renewing applicants sheds light on additional barriers. **First-time CADAA filers are being offered, but then are not paid, their financial aid more than twice as often as renewing filers** (See Figure 4).³⁴ In other words, students applying for CADAA for the first time are successfully applying for aid and receiving financial aid offers, but not receiving aid. A significant portion are either not enrolling in college after applying for aid or not able to complete the final additional steps to ensure their aid is disbursed.

Figure 3. **Examining How Many Undocumented Students Apply, Complete and Receive State Financial Aid**

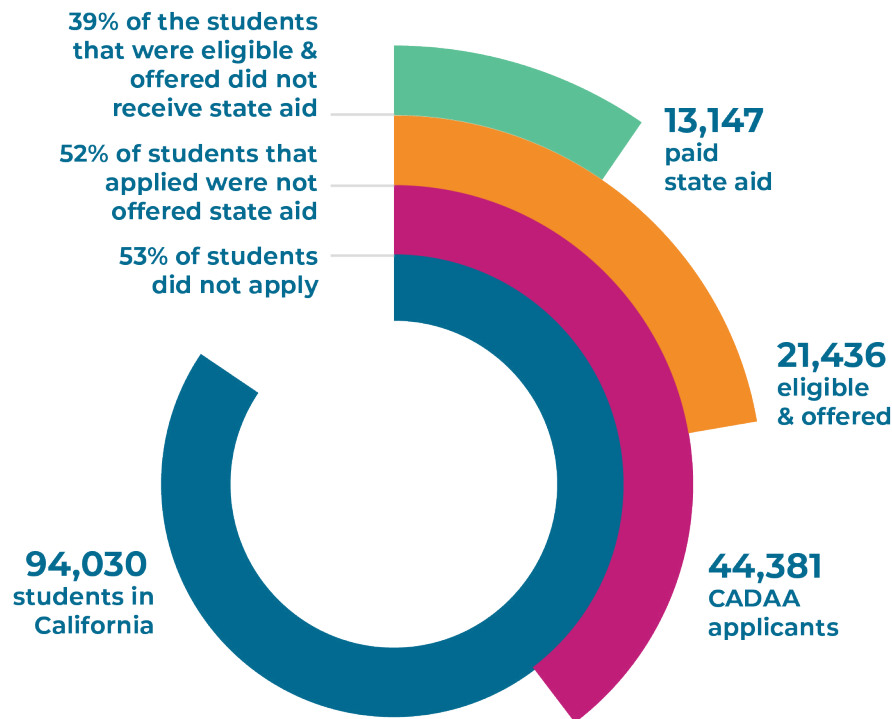
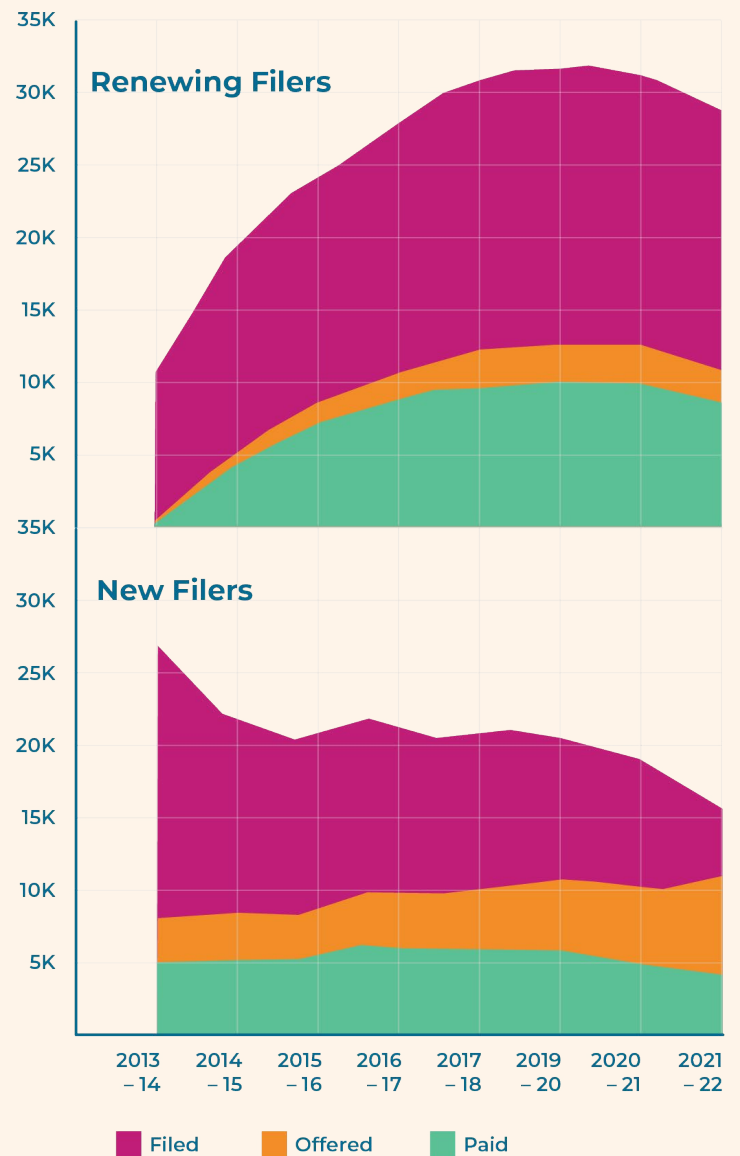


Figure 4. **Persistent Gaps for New vs. Renewing CADAA Filers**

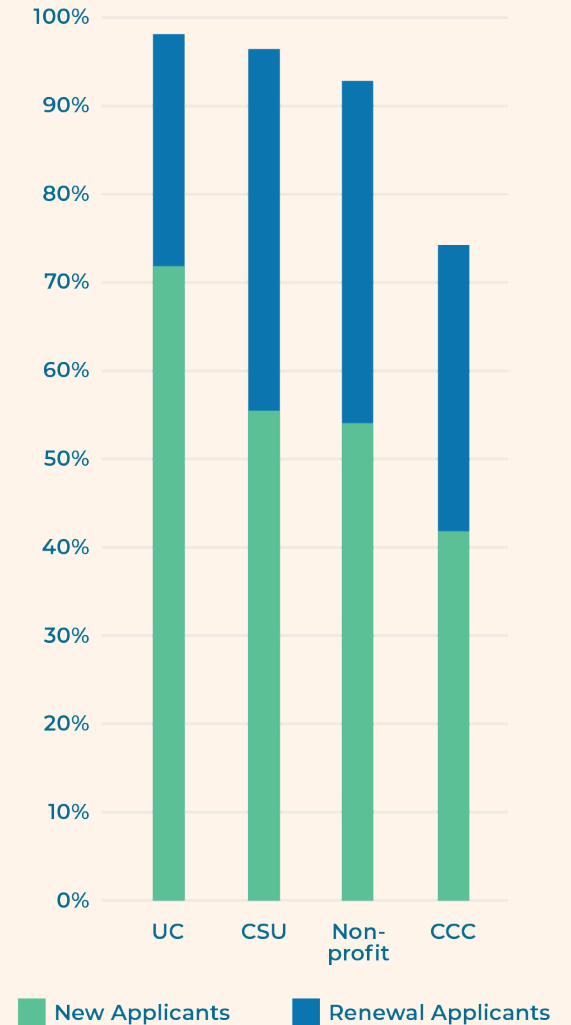


2021–22 CSAC data on Cal Grants provides further insight. The “paid rate,” or the ratio of those that received a financial aid award to those that were offered, are significantly lower for first-time versus renewing CADAA filers across all of California’s higher education segments. The “paid rate” differential is most stark at the community colleges, where the Cal Grant “paid rate” is nearly 75 percent for renewal applicants compared to just over 40 percent for new applicants (See Figure 5). This is concerning since the majority of undocumented students are enrolled at community colleges.

“Paid rates” also vary widely depending on the campus. A forthcoming analysis being conducted by Immigrants Rising was presented to the work group and revealed significant variation in how many CADAA filers ultimately received their offered Cal Grants based on the campus at which they were enrolled. The number of paid Cal Grant awards ranged by institution from as many as 561 to as few as one paid CADAA student. Similarly, the number of unpaid Cal Grant awards varied by institution from as few as no unpaid awards to as many as 107 students that were offered an award but ultimately did not receive it. This analysis indicates the significant impact that campus-level policies and practices have on how CADAA students can access their financial aid.

It is important to note that first-time CADAA applicants must take additional steps to receive state financial aid. Most notably, new students, as well as transfer students arriving at a new campus, must also submit the “AB 540 affidavit” to establish and verify their residency status. Renewal applicants continuing at their same campus do not have to take these further steps, but the data still points to challenges that undocumented students face in financial aid regardless of whether it is their first time applying or if they are simply renewing their CADAA.

Figure 5.
Cal Grant Paid Rates by Higher Education Segment (2021–22)



A key factor affecting students' "paid rates" and access to financial aid is the CADAA verification process (separate from the AB 540 affidavit verification process), which was created to align with the verification process of applications for federal student aid. The U.S. Department of Education (Department) mandates verification to confirm the accuracy of information reported on the FAFSA. The Department uses an algorithm to select students for verification which is carried out by individual campus financial aid offices. Institutions may also select students for verification of information submitted through their FAFSA or other financial aid applications. Students can have their financial aid put on hold pending results of the verification process.

In 2018, the Department launched new procedures that reduced FAFSA verifications by 900,000 applications.³⁵ In July 2021 the Department announced that they would temporarily waive verification, except in cases of identity theft and fraud, for part of 2021–22 and the 2022–23 application cycle to provide relief to millions of students facing challenges because of the COVID-19 pandemic.

The Commission initiated a CADAA verification process that randomly selects 20 percent of applications. While the number of mandated FAFSA verifications has decreased in recent years, the Commission has not yet made similar policy and program adjustments to the annual CADAA verification process. CADAA verification requires campus financial aid staff to collect sensitive documents from undocumented students (e.g., tax transcript and other tax related documents, household size, contact information and home address, etc.), confirm the accuracy of such information, and notify students of findings. In 2021–22, over 8,000 CADAA filers were selected for verification. Of these applicants, 54.5% received a Cal Grant, compared to 58.7% of applicants who were not selected for verification.

The next section explores some of the specific challenges that undocumented students face when applying for financial aid and sheds light on what is happening in the process that contributes to the drop-off and gaps we see in the data.

In 2021–22

8,000+

CADAA filers were selected for verification

54.5%

received a Cal Grant compared to

58.7%

who were not selected for verification



Basic Needs and Mental Health Challenges

In addition to the costs of tuition and student fees, undocumented students have struggled to meet the rising costs of covering other basic needs, such as housing, food, textbooks and transportation. In a 2020 report by the UC Collaborative to Promote Immigrant and Student Equity (UCPromise) and the Undocumented Student Equity Project (USEP), of the 1,300 CSU and UC undergraduate undocumented students surveyed:³⁶

59%

reported experiencing food insecurity

46%

reported going without materials needed for their studies at least sometimes

33%

reported experiencing difficulty paying their bills; this was higher among students without current legal status (43%) compared to students with DACA (35%)

Undocumented students' financial challenges have been exacerbated by the COVID-19 pandemic. A September 2019 Commission survey found 1 in 3 California postsecondary students experienced food insecurity in any given month,³⁷ and early in the pandemic 7 in 10 students reported losing some or all of their income because of the pandemic.³⁸ Currently, undocumented students are not eligible to receive benefits from CalFresh, a federally funded assistance program that helps provide access to fresh and nutritious food for low-income families, nor the California Food Assistance Program (CFAP) depending on their age. Single CalFresh recipients can receive over \$200 per month to help with food costs.

Financial and other immigration-related stressors affect the mental health and well-being of undocumented students. In the same 2020 report by UCPromise and USEP, 31 percent of respondents reported symptoms of anxiety or depression at a level that warranted clinical treatment.³⁹ Moreover, 72 percent felt they needed to see a mental health professional, but only 48 percent had ever sought help. The availability and accessibility of mental health services for undocumented students varies by campus and segment of the higher education system.



Housing is a big issue especially in San Francisco, and I have to pay for parking. It's a stressor and gives me anxiety.

I'm trying to go into a nursing program and it's a lot of work and a lot of time to study. I need two jobs to keep up with rent but I am anxious about balancing that with going to school full time. — UNDOCUMENTED STUDENT AT SAN FRANCISCO CITY COLLEGE



STUDENT STORY



Born in Mexico with epilepsy, I moved to the U.S. for better medical care and realized I was undocumented in high school. After being unable to get DACA for 4 years, I was able to get it my last year in college. I graduated in 2022 and now run a company helping immigrants start businesses, funded by grants and support from various organizations. The California Dream Act Application helped me cover most of the cost of college tuition and gave me the confidence to pursue a college education.

— UCLA GRADUATE, 2022

Financial Aid and College Affordability Challenges

Despite California's leadership in providing financial aid opportunities to undocumented students, many still encounter challenges applying for and receiving financial aid, resulting in a gap between the number of undocumented students who are eligible for aid and those who are actually receiving aid.

These challenges arise early on when students are still in high school. Too often, undocumented high school students have limited access to information about their financial aid options. They are barred from federally funded college prep programs, like TRIO, which support high school students in enrolling in college. The challenges follow students as they apply for financial aid as seen in Figure 6. To access aid, students must complete multiple application forms requesting detailed personal and financial information. Undocumented students expressed concerns that providing information would impact themselves and their family members' safety and stability. The forms are confusing to students, and when they hit roadblocks they lack clear guidance or assistance from school personnel. Many high school staff charged with guiding undocumented students through the financial aid process are themselves unclear on the eligibility requirements. For example, students from the focus group reported receiving inaccurate information that they must have DACA status in order to apply for nonresident tuition and state aid.

Underlying these practical challenges in accessing and receiving state financial aid, undocumented students are barred from receiving federal financial aid. Unable to access Pell Grants, subsidized federal student loans, work-study, or attain work authorization, undocumented students struggle to meet the costs of college through financial aid or by generating income to help meet the cost of attendance. For many, these limited options are a deterrence from attending college altogether.

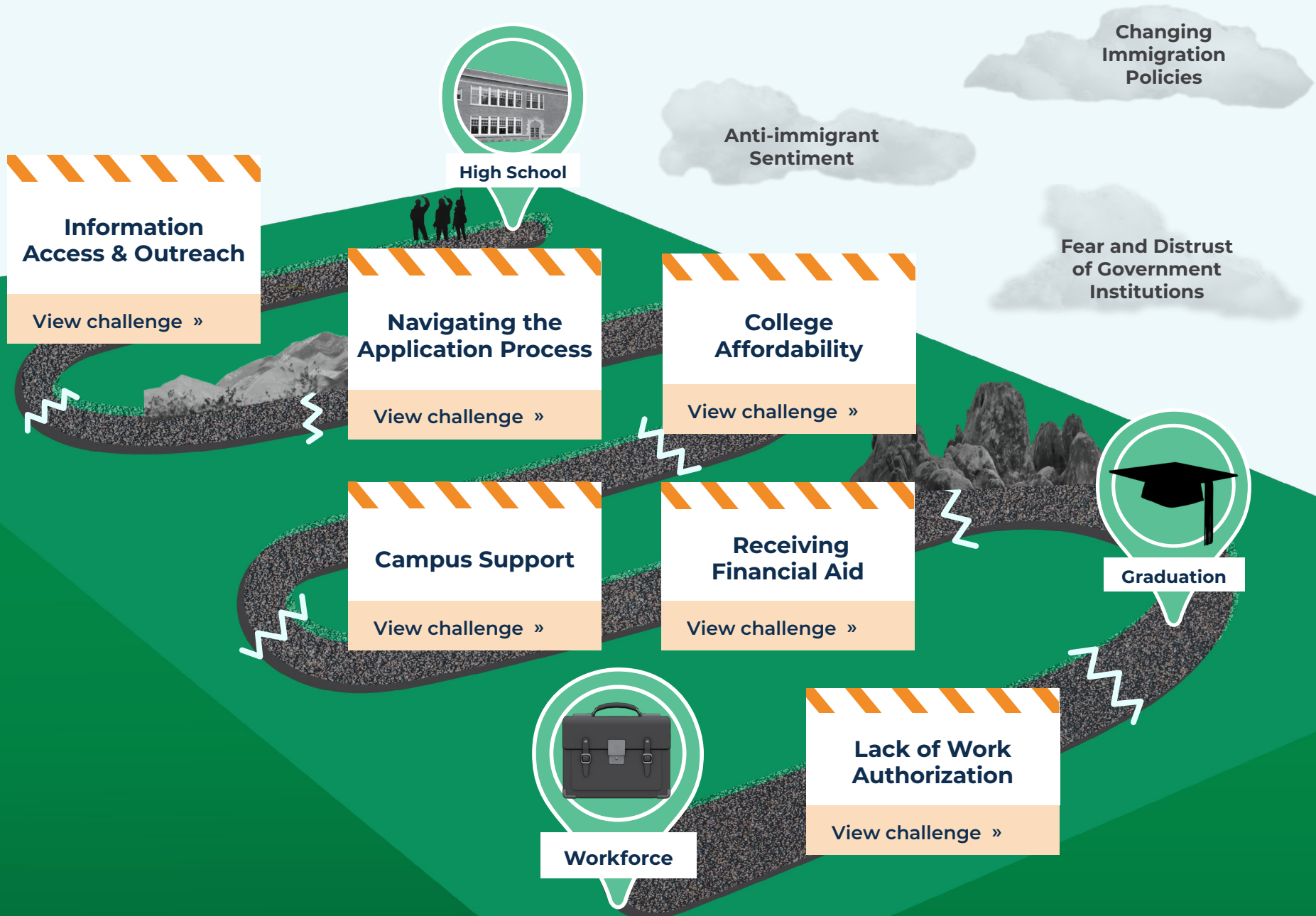


When I applied [for CADAA] I had to go to two different high school counselors to help me out. After the first time, continuing on, I would have to go to the Dream Center at my school to help me, but often it was students helping me and they didn't understand the wording either. I had to jump around and ask from person to person and it was pretty stressful. — **FOURTH YEAR STUDENT AT SONOMA STATE**



Figure 6.

ROADBLOCKS to Financial Aid and Opportunity for Undocumented Students



Information and Outreach

- ⊘ **UNDOCUMENTED STUDENTS, ESPECIALLY THOSE AT THE HIGH SCHOOL LEVEL, HAVE LITTLE ACCESS TO INFORMATION** and receive inaccurate or contradictory guidance on their financial aid options, application requirements and the overall financial aid process, which discourages them from filing a CADAA.
- ⊘ **FINANCIAL AID INFORMATION SESSIONS OFTEN ONLY COVER THE FAFSA** with little focus on CADAA. This sends mixed messages to undocumented students about the availability of financial aid to support their higher education goals. At the same time, high school counselors lack the support and resources needed to advise undocumented students.
- ⊘ **APPLYING FOR FINANCIAL AID, AND PROVIDING PERSONAL DATA, CAN CREATE ANXIETY** for undocumented students and their families given their immigration status. There are few efforts to fully engage parents/guardians and instill trust that their data is secure. Additionally, many students are not comfortable with sharing their parents' information and might decide not to apply for aid altogether.

Application Challenges for Students from Mixed-Status Families

Students from mixed-status families, or households with family members who have different citizenship or immigration statuses, experience unique challenges navigating the financial aid process. These students are often unsure if they should file a FAFSA or a CADAA. In addition, students from mixed-status households can be wary and fearful of the application process. Many have concerns that turning over tax information, or undergoing verification, may put their undocumented family members in jeopardy.

Navigating the Application Process

- ⊘ **UNDOCUMENTED STUDENTS HAVE TO FILL OUT MULTIPLE APPLICATIONS** (i.e., CADAA, AB 540 affidavit, Promise Grant) that are processed by different entities (CSAC, admissions, financial aid) which creates hurdles and confusion for students, and discourages some from seeking additional aid. For example, community college students might assume they have accessed all the financial support available as their tuition is covered through AB 540 and a Promise Grant. As a result, the student may not submit a CADAA and receive additional aid available to them.
- ⊘ **THE PROCESS FOR VERIFYING THAT STUDENTS ARE AB 540 ELIGIBLE IS DIFFERENT** across higher education segments and even campuses, making it difficult for students to know what is required of them to gain tuition exemption and causing delays in their financial aid. This is especially concerning for undocumented transfer students who have to go through this process at each campus they attend.
- ⊘ **UNDOCUMENTED STUDENTS LACK A CLEAR ROADMAP** and comprehensive resource bank that helps them understand whether they have successfully applied for all of the financial aid programs they are eligible for.
- ⊘ **THE CADAA INCLUDES MANY QUESTIONS THAT ARE DUPLICATIVE, CONFUSING, OR NOT APPLICABLE** to undocumented students, which increases the potential for errors and discourages some from completing the application altogether.

Campus Resources and Support

- ⊘ **FINANCIAL AID AND ADMISSIONS OFFICERS ARE NOT ALWAYS FULLY TRAINED** or resourced to address the unique needs of undocumented students, nor are they always up to date on the latest financial aid options for these students. This creates delays and confusion for undocumented students who are seeking financial aid.
- ⊘ **ON MANY CAMPUSES, THERE IS A LACK OF COORDINATION** amongst various departments in addressing the needs of undocumented students, causing students to feel like they are being shuffled around and making it difficult for them to receive the assistance and answers they need.
- ⊘ **DREAM RESOURCE CENTERS (DRCS) AND UNDOCU-LIAISONS PLAY A CRITICAL ROLE** within campuses. They are trusted entities providing a range of services including financial aid guidance as well as legal services, leadership training, counseling, and support navigating college. DRCS often serve as one-stop shops for undocumented students seeking support. Yet, these administrators usually have multiple roles on campus and struggle to adequately meet undocumented students' needs.
- ⊘ **THE LACK OF CASE MANAGEMENT** or follow-up with undocumented students places the burden on them to independently seek financial aid, follow-up, fix application errors, and ensure that their awards are processed in a timely manner.

Receiving Financial Aid

- ⊘ **STUDENTS RECEIVE LITTLE INFORMATION ON CAMPUS ABOUT THE VARIOUS AID OPTIONS** available to them, and as a result do not apply for all of the aid for which they are eligible. For example, some community college students receive a tuition waiver but no information about Cal Grants, a significant financial aid resource, which impacts the decisions they make about their college or transfer journey. Some students might not be aware that they have not successfully completed an AB 540 affidavit until they are flagged as international students, causing delays in their financial aid process.
- ⊘ **SOME STUDENTS ARE OFFERED LOANS TO OFFSET THE LACK OF FEDERAL AID.** Heavy loan debt is incompatible with the state's goal of having debt-free college, especially considering that loans offered to undocumented students through the DREAM Loan Program are currently not eligible for all forgiveness programs consistent with those for federal loans.
- ⊘ **IN ADDITION TO THE BURDEN OF REQUIRING STUDENTS TO UNDERGO A SEPARATE AB 540 AFFIDAVIT VERIFICATION** process with their individual campuses, many CADAA filers must undergo the financial aid verification process. Current Commission policy requires a CADAA verification rate of 20 percent to align with federal procedures; however, in recent years there have been changes in federal aid policy that reduced the number of students being required to undergo verification. This is a key issue because undocumented students often encounter difficulties in completing verification requirements causing some to drop out of the application process. Yet another challenge facing undocumented students is the lack of a statewide verification process. Current state policy does not require all segments of higher education to utilize a uniform CADAA verification process, resulting in variance between institutions in how verification is implemented and its potentially negative impact on students.



College Affordability

- ⊘ **THE LACK OF FEDERAL FINANCIAL AID**, especially in the form of Pell Grants, which will reach a maximum award of \$7,395 in the 2023–24 academic year, makes college unaffordable for many undocumented students, the majority of whom are of low-income backgrounds and who would otherwise be eligible for such forms of aid.
- ⊘ **MANY UNDOCUMENTED STUDENTS DO NOT QUALIFY FOR CRITICAL SAFETY NET PROGRAMS**, like CalFresh or the California Food Assistance Program (CFAP), that can provide over \$200 per month for food expenses, because of their immigration status; programs that have become more critical for college students experiencing food insecurity.
- ⊘ **THERE CONTINUES TO BE A MISCONCEPTION** that receiving financial aid could cause undocumented students and their families to be considered “public charge” and in turn, negatively impact the potential to adjust their immigration status in the future.⁴⁰
- ⊘ **MANY UNDOCUMENTED STUDENTS LACK WORK AUTHORIZATION**, which makes it difficult for them to gain career-relevant and sustainable work experience while in college, and makes their career aspirations after college even more challenging. This alone can discourage many undocumented students from pursuing higher education altogether, if they do not see a viable future in the workforce once they have received a degree.



I’m a queer Indigenous Latino who migrated from Mexico to the U.S. at nine years old and the first in my family to graduate from college. My primary language growing up was Zapotec, so when I started public school in Los Angeles, I struggled to learn English and Spanish. Despite the language barrier, I excelled academically. When I graduated H.S. in 2006, I was admitted to universities but was denied financial aid because of my legal status.

As an affordable college pathway, I enrolled in community college after learning that CA Assembly Bill 540 would allow me to pay in-state tuition. But even working full-time at a minimum-wage job was not enough to help me pay for tuition, books, and general living expenses; therefore, I dropped out. I thought my life had stalled. However, the passage of the CA Dream Act in 2011 and DACA in 2012 revived my dream of pursuing higher education. So, I re-enrolled in community college, taking evening classes while working full-time. To me, receiving financial aid meant I did not have to sacrifice eating, falling behind on rent, or getting into immense debt to receive an education.

Since graduating from UC Berkeley in 2017, I have worked in the non-profit sector, helping business leaders implement inclusive recruitment practices and advocating for legislation to help immigrant families achieve economic freedom. I am deeply grateful that I was able to pursue my goals because of progressive and intentional policies like the CA Dream Act that supported people like me. Because of this, I remain committed to ensuring that others like me have clear pathways to educational and career success.”

— **UC BERKELEY TRANSFER GRADUATE, 2017**



Income and Employment Options for Undocumented Students

A looming challenge confronting undocumented students as they consider whether or not to pursue higher education is the lack of viable opportunities available to them to obtain professional development and formal employment through work authorization, both during their college journey and after graduation. This troubling disconnect between undocumented students in the higher education pipeline that California's postsecondary institutions are preparing for the workforce and the federal roadblocks to them obtaining formal employment, are detrimental to California's economy and the well-being of our communities.

The federal Immigration Reform and Control Act of 1986 (IRCA) requires employers to verify their employees' identity and work eligibility, and prohibits employers from knowingly hiring anyone without U.S. work authorization. As such, immigration status severely constrains undocumented students from generating income and formal work experience. Given the significant number of undocumented high school students expected to graduate from a U.S. high school each year without immigration relief, this challenge is far-reaching in scope and magnitude.

It is in the interest of students, California, and the United States more broadly that these undocumented students should have the ability to put their education and talent to use after graduation through access to work authorization or other employment options that allow their full participation in our economy and community.

Below is a snapshot of current efforts underway to create income generating and professional development opportunities for undocumented students.

OPPORTUNITIES WHILE IN COLLEGE

- **Service Grants:** These grant awards enable undocumented students to gain experience through volunteer and community service opportunities. California has created two programs — the California Dream Act Service Incentive Grant and #CaliforniansForAll College Corps — which provide undocumented students with grants ranging from \$2,250 per semester to \$10,000 per year for performing community service while in college.
- **Fellowships:** Several campuses offer fellowship programs that are open to undocumented students, which generally provide students with short-term opportunities to focus on research, professional development training, and hands-on work with a mentor or advisor. The primary purpose of the study or research is to benefit the fellow's education

or professional training, and can include a stipend. Immigrants Rising is a helpful resource for information regarding fellowships available to undocumented students pursuing higher education, regardless of their immigration status.

- **State Entities:** An effort is currently underway to assess whether state entities can hire undocumented individuals who do not have federal work authorization. According to legal scholars, when Congress passed IRCA, it did not limit the states' power to determine whom they could employ, and the Supreme Court has repeatedly found that Congress has no power to regulate state governments in certain areas, such as employment, absent "clear language" to allow it. The *Opportunity for All* campaign, launched in October 2022 calls on the University of California to permit the hiring of students who lack permanent legal status, arguing that undocumented students do not have equal access to on-campus employment opportunities. It is important to note that this legal argument could be applied beyond UC, and beyond universities altogether, to other state entities.

OPPORTUNITIES AFTER COLLEGE GRADUATION

Professional Licenses & Entrepreneurship:

In 2014, Senate Bill 1159 was signed into law, allowing anyone with an individual tax identification number (ITIN) to obtain a professional license (i.e., law, accounting, health, and more) in California through any state licensing board, regardless of their immigration status so long as they meet all other requirements. Access to professional licenses allows undocumented immigrants to earn a living as professional consultants, for example.

More broadly, undocumented individuals can obtain and use an ITIN to work as independent contractors or freelancers, given undocumented immigrants are required to pay taxes on income earned in the U.S. They can also start and run their own businesses, as well as join workers' cooperatives. There are efforts to help undocumented students explore these avenues in order to generate income once they have graduated from college; some campuses help students understand the process for starting an LLC and inform employers about the ways they can work with undocumented students (See Page 36). According to The New American Economy, in 2019 there were over 182,000 undocumented entrepreneurs in California, with the entire undocumented immigrant population in the state contributing over \$2.5 billion in state and local taxes.⁴¹

Addressing Financial Aid and College Affordability Challenges

Addressing the financial aid and college affordability challenges that undocumented students in California face is imperative to achieving California's promise of offering a debt-free college education for all students, and California's commitment to closing economic, ethnic and racial disparity gaps in college attainment. Considering that California is home to the largest group of undocumented students, tapping into their potential will help California continue to grow its workforce and strengthen its global economic standing; as well as enrich our classrooms, workplaces and communities.

There are multiple stakeholders who can help undocumented students better access financial aid in California and address the financial burden placed on these students due to their immigration status. The following recommendations provide CSAC, higher education leaders and campus practitioners, as well as state and federal policymakers with concrete steps they can take to help more undocumented students in California apply for financial aid and pursue a debt-free college education.



Figuring out how to pay for things through paid internships or work study or gain employment for folks who don't have DACA would be helpful. Especially if [students] can't do anything else [after high school], they can hopefully go to college. — UNDOCUMENTED STUDENT



Overview of Solutions for Stakeholders

Administrative

CSAC as the administrator of CADAA can make direct administrative changes to the application itself to simplify the process and improve the experience of undocumented students.

[Jump to section »](#)

Campus

California's universities and colleges can improve campus department coordination and streamline application and disbursement processes.

[Jump to section »](#)

State

State policymakers can champion innovative legislation to expand and strengthen financial aid opportunities available to undocumented students moving forward.

[Jump to section »](#)

Federal

Policymakers can advocate to expand Pell Grant eligibility and for federal policies that uphold and expand protections granted under the DACA program.

[Jump to section »](#)



Administrative Changes and Recommendations

CSAC, as the administrator of the CADAA, can make direct administrative changes to the application itself to simplify the process and embed real-time resources within the CADAA website to help students successfully navigate and complete the application. The following administrative enhancements can help increase the number of undocumented students who apply for and receive financial aid:

- **SIMPLIFY AND STREAMLINE THE CADAA** by assessing the questions on the form, incorporating visual aids for tax questions, making the parental/guardian signature a one-step process, and revising language to be clearer and potentially shorter. Considering that the FAFSA will undergo an overhaul to shorten and simplify the application beginning in the fall 2023, California has an opportunity to modernize CADAA as well and bring parity to the financial aid process as much as possible for students regardless of their immigration status.
- **ENHANCE STUDENTS' ABILITY TO RECEIVE DIRECT AND PROMPT ANSWERS** to their questions about the CADAA or eligibility for other state-based aid by exploring opportunities to improve CSAC's student call center operations.
- **ESTABLISH AN OPT-IN PROCESS FOR CADAA FILERS** so they can consent to receiving text messages from CSAC about their financial aid status and opportunities. Providing students with the ability to receive messages through their preferred mode of communication will help ensure they can learn about any actions they must take to secure their financial aid or pursue other benefits.
- **REDUCE THE PERCENTAGE OF MANDATED CADAA APPLICATIONS RANDOMLY SELECTED** for verification to better align with recent federal verification process changes.
- **UPDATE THE CADAA WEBSITE** so that it is easier to navigate, alerts users about incorrect information in order to help students troubleshoot, offers users the option to navigate it in a language other than English, and provides students a roadmap for other aid options that might be available. The CADAA website could also provide a centralized portal with a library of virtual training modules and resources for administrators and students.
- **PROVIDE THE COMMISSION WITH ADDITIONAL RESOURCES** to create and staff a centralized CADAA verification submission process, which uses the online CSAC portal, to ensure that applicants know exactly what will be asked of them to complete the process.



Campus Changes and Recommendations

California's universities and colleges play a critical role in helping undocumented students answer questions or address issues they might have concerning financial aid, creating financial aid packages for undocumented students and ultimately ensuring these students apply for and receive financial aid. To that end, higher education leaders should assess how campus departments coordinate and partner to support undocumented students and how they streamline application and disbursement processes for students. The following recommendations would help improve how campuses support undocumented students with financial aid and college affordability:

- **INCREASE AND STREAMLINE COORDINATION** between various departments (but especially admissions, financial aid, basic needs centers, and Dream Resource Centers) within each campus to ensure staff are knowledgeable about the financial aid options available to undocumented students, can help students successfully navigate the financial aid process, and are sharing best practices in how to serve undocumented students.
- **EXPLORE CASE MANAGEMENT MODELS** where an individual or team of individuals help undocumented students navigate the financial aid process until they receive their awards, and help connect students to additional resources they might need.
- **PROVIDE CAMPUS STAFF WITH TRAINING** and resources to help them troubleshoot and build their capacity to serve undocumented students.
- **COLLECT AND MAKE AVAILABLE ACCURATE DATA** regarding the number of undocumented students (both AB 540 and non-AB 540) within the University of California, California State University and California Community College systems.
- **WORK WITH UNDOCUMENTED STUDENTS TO PURSUE SCHOLARSHIP OPPORTUNITIES** or other funding sources — such as institutional aid — that can help backfill some of the aid undocumented students do not receive, either because they are not eligible for federal aid or because they have exhausted all aid options available to them.
- **COLLABORATE WITH CALIFORNIA EMPLOYERS** to raise awareness of independent contracting and entrepreneurship opportunities for undocumented students and organize career fairs as a means to encourage employers to establish and broadcast their inclusive hiring practices.



SPOTLIGHT: Campus Best Practices

Coordinating between Admissions, Financial Aid, and Dream Resource Centers to Support Undocumented Students

While undocumented students and the work group identified the need for increased coordination between various departments on campuses to support undocumented students, there are promising practices and initiatives already happening on some campuses that can serve as a model for other campuses looking to support undocumented students:

- Through its **UndocuAllies** program, **American River College** has assembled an undocu-liaison team that includes a financial aid officer, professor, counselor, admissions staff and several administrators who work together to support undocumented students on campus, particularly with accessing financial aid. The program has hired a full-time liaison to help undocumented students establish residency status and follow up on their financial aid process.
- Through its Undocumented Student Program, **UCLA** has identified **Campus Allies** including UCLA staff, faculty members, and financial aid officers — who have undergone the UndocuALLY training. The UndocuALLY training is an educational training dedicated to increasing the UCLA community's awareness of the unique needs of undocumented students. Faculty and staff that attend the training learn about the history, legislation, and experiences of undocumented students in higher education, and receive an UndocuALLY decal to display in their immediate work-space that will show they are familiar with and supportive of the undocumented student community at UCLA. The UndocuALLY training sessions are held once a quarter.

- The **Dream Scholars Resource Team (DSRT)** at **UC Santa Barbara** is a cross departmental group that develops campus responses to address the needs of undocumented students. DSRT members work directly with students and include faculty conducting research and studying policy relevant to Dream Scholars. Their goal is to create a network of departments responsible for Dream Scholars' needs, resources, policies, advocacy, education, and support.

Streamlining the AB540 Affidavit Process for Undocumented Students

Inconsistencies in the requirements and processes that campuses and higher education segments use to exempt students from nonresident tuition rates (AB 540) creates confusion for these students. However, several campuses have implemented innovative practices to simplify the AB 540 affidavit process:

- Many campuses, including **Chico State** and **American River College**, are relying on **self attestation to establish AB 540 status** amongst eligible students and will only require additional documents if there is conflicting information in their application.
- Campuses like **UC San Diego** are helping students **determine residency when they are offered admissions**, instead of after students accept an admissions offer, to ensure more speedy delivery of the affidavit and the financial aid award.
- Campuses like **Chico State** **proactively determine which students have not turned in their affidavits** by coordinating with campus admissions, Dream Resource Centers, and financial aid offices and following up with students through multiple means (email, phone calls) to ensure they complete the process successfully.

SPOTLIGHT: Campus Best Practices continued

Providing undocumented students with work-based learning opportunities

While some undocumented students might lack work authorization, higher education institutions in California have found creative ways to provide these students with valuable, paid work experience.

- Through their **Office of Student Fellowships, Santa Clara University** works with undocumented students and alumni to identify and apply for national fellowship programs that are available to students, regardless of immigration status.
- **UC Merced's Center for Career & Professional Advancement** hosts a **career fair for UndocuScholars** to help them gain internships and employment opportunities. The university has also established agreements with employers and industry partners to help them understand the legal channels through which they can hire and provide opportunities to UndocuScholars.

Helping students cover unmet financial needs

- The gap in financial aid that undocumented students experience, especially since they are not able to receive federal Pell Grant aid, is significant. The **UC system** backfills for missing Pell Grant aid for CADAA students by leveraging institutional aid through its **Blue and Gold Opportunity Plan**.





State Policy and Legislative Recommendations

State policymakers can champion innovative legislation to expand and strengthen financial aid opportunities available to undocumented students. Given the uncertainty surrounding DACA and broader immigration reform efforts at the national level, California's state leaders must find innovative ways to offset the restrictions in financial aid, career experience, and safety net programs that undocumented students encounter while pursuing higher education in California. The following state policy and legislative recommendations would help ensure college remains affordable and a viable option for California's undocumented students:

- **AUTHORIZE CSAC TO EMBED THE AB 540 AFFIDAVIT INTO THE CADAA**, so that students only need to submit a single form through a single entity. CADAA submission data can be used by campuses to establish AB 540 status and Promise Grant eligibility. This would help alleviate the additional burden that students need to go through to establish AB 540 residency status, and more importantly, help ensure that students are not foregoing financial aid by not completing a CADAA in the first place.
- **CREATE A STATE-FUNDED GRANT** that can offset some of the financial burden undocumented students absorb by not being eligible for the federal Pell Grant. This grant can be structured similarly to other recent Cal Grant expansions for student parents and current/former foster youth that provides CADAA Cal Grant recipients with additional support for non-tuition expenses beyond their current Cal Grant award.
- **ENSURE THAT UNDOCUMENTED STUDENTS ARE ELIGIBLE FOR STATE ASSISTANCE PROGRAMS**, as these programs allow students to meet their basic needs, such as housing and food assistance. When establishing these programs, it is important to ensure they are accommodating of students and do not replicate barriers that exist at the federal level, like limitations on college student access to the Supplemental Nutrition Assistance Program (SNAP, or CalFresh).
- **CONSIDER LEGISLATION OR BUDGET ACTIONS TO ENSURE CALIFORNIA'S UNDOCUMENTED STUDENTS ARE ABLE TO RELIABLY ATTAIN THEIR AB 540 STATUS**, including reducing the number of years of school attendance required for such status.
- **UPDATE THE DREAM LOAN PROGRAM**, so that students who receive this type of aid can become eligible for all loan or debt forgiveness programs consistent with their peers, and to ensure that interest rates attached to these loans remain low.
- **WORK WITH CALIFORNIA'S COLLEGES AND UNIVERSITIES TO CREATE MEANS FOR UNDOCUMENTED STUDENTS TO PARTICIPATE IN PAID OPPORTUNITIES** while in college — such as fellowship programs, apprenticeships, and contract work — as a creative path to offsetting affordability issues and helping them gain career skills and training.
- **EXPLORE WORK AUTHORIZATION PROGRAMS** and opportunities for undocumented students, like the ability for the state and its entities to hire undocumented individuals as outlined in the *Opportunity for All* campaign. This might include convening a working group of representatives from the Attorney General's Office, California state human resources officials, and public colleges and universities to explore options for California public employers to support undocumented college students and graduates.



Federal Policy Recommendations

California’s higher education leaders and elected officials can use their platforms and voice to make the case at the national level for policies that can open federal financial aid to undocumented students and provide them with a path to adjustment of status. These following federal policy actions would better support undocumented students and help address the national talent gap for graduates with postsecondary education or training:

- EXPAND PELL GRANT ELIGIBILITY for undocumented students.
- INCLUDE UNDOCUMENTED STUDENTS IN FEDERAL EFFORTS to extend work authorization and legal protections via H1-B visas to international students.
- PASS COMPREHENSIVE IMMIGRATION REFORM, including adoption of a federal Dream Act for qualifying students to be able to more fully and securely contribute to our nation’s economy.



STUDENT STORY



My family immigrated to Los Angeles in 2001. My parents always struggled financially and affording college tuition was a big challenge. Once I transferred to UCLA, the campus Dream Center guided me through the CADAA and I was able to apply and receive financial aid. If I had not received that support, I may not have graduated or I would be working to pay off private loans. Instead, I’m pursuing a law degree at UC Hastings. I am extremely grateful that there is an opportunity for people like me to get an education with the help of CADAA. Before I knew that CADAA was available, it was hard to think about what I would do in this country I’ve called home for most of my life.”

— **UCLA TRANSFER GRADUATE & UC HASTINGS LAW STUDENT**



Building Trust & Getting More Students to Apply for the California Dream Act Application

California recently adopted a new law that requires all high schools to ensure their seniors complete the FAFSA, CADAA, or an opt-out waiver before graduating from high school. Equitable implementation of this new law requires proactive strategies:

- Launch a public awareness campaign, in partnership with high school and community organizations, that helps undocumented students understand that they do have financial aid options to pursue a college education, that the CADAA is safe to fill out, and that they belong on college campuses, while also providing information on the unique needs of students from mixed-status households.
- Equip families with a resource list that can empower students and their families, especially now that California’s public colleges and universities offer free legal services to students, staff, and faculty, at their campuses.
- Develop and share a toolkit for high school counselors and administrators to equip them with information about CADAA eligibility requirements and the application process, and offer training to high school counselors on financial aid options for undocumented students.
- Establish regional hubs, similar to Dream Resources Centers at college campuses, that can work with local high schools within a region and ensure undocumented students and families have access to the resources, information, and support they might need to pursue higher education.

Conclusion

California has built a strong foundation for supporting undocumented students in their pursuit of higher education, but there is substantial work to be done in making college truly affordable and helping undocumented students fulfill their college dreams. Our state leaders and higher education advocates have seen first-hand the positive results and, in the process, learned a great deal about the experiences of undocumented students when they are offered equitable educational opportunities. Undocumented students have successfully graduated from college and have gone on to make invaluable contributions to California's workforce and positively impacted their personal and our state's economic trajectories. Undocumented college students overcome immense obstacles to attain a college education. They represent the very best of our communities and the entrepreneurial spirit on which this country has been built.

By examining undocumented students' journeys navigating the financial aid pipeline, the Undocumented Student College Affordability Work Group identified many challenges — from insufficient access to information about and assistance with the application process, to confusion around applying for multiple aid programs, to the lack of coordination and resources in obtaining



on-campus support, to barriers in ultimately receiving financial aid, and more. Beyond these obstacles specific to the financial aid process, the work group also identified problems of food and housing insecurity, exacerbated by the increasing cost of living in the state, that are felt particularly acutely by undocumented students.

The work group proposed specific and actionable recommendations at the administrative, campus, and state and federal policy levels to address these pipeline challenges. This report is intended to provide a bird's eye view of the challenges and targeted recommendations that can improve undocumented students' experiences with successfully navigating the college financial aid application process and ultimately with increasing award rates for undocumented students.

The recommendations set forth in this report can serve as a roadmap for reform for lawmakers, higher education system representatives and advocates, CSAC, as well as campus administrators and practitioners, to encourage fruitful collaboration among and within these various entities. Together, we can work to close the financial gap and make college affordable for undocumented students.

Appendix A

Undocumented Student Affordability Work Group

The California Student Aid Commission (CSAC) convened the Undocumented Student Affordability Work Group to gain insight into the challenges undocumented students face in applying for financial aid and paying for college. The work group was asked to identify targeted recommendations for increasing access to financial aid, streamlining the CADAA, and making college more affordable for California's undocumented student population.⁴²

Members of the Student Aid Commission directed CSAC staff to convene this work group following an informational presentation during their July 2020 meeting which pointed out that thousands of potentially eligible undocumented students never submit a CADAA, and among those that do, many do not receive payment on awards they are offered.

With funding secured by the College Futures Foundation, CSAC partnered with external consultants from The Raben Group (Raben) to assist in coordinating and facilitating the work group and developing this report.

The work group was curated to include a range of expertise and direct experience with the administrative practices, campus practices, and policies that affect undocumented students' ability to apply for and receive financial aid. This diverse group included students, financial aid administrators, Dream Resource Center coordinators, education and immigration policy experts, advocates, and immigrant legal services providers representing private non-profit universities and all three segments of California's high education system: California Community Colleges (CCC), California State University (CSU), and University of California (UC). See Appendix B for the full list of work group members.

The work group convened virtually six times between June and November of 2022 for two hour discussion sessions. Using a pipeline analysis approach, each session focused on a specific topic along the continuum students navigate when applying for financial aid. Following each meeting, summary notes were shared with work group members and feedback was welcomed to ensure key takeaways were captured from the discussions.

Focus Group, Interviews, and Listening Sessions

CSAC prioritized hearing directly from undocumented students about their experiences navigating the financial aid process and paying for college. Raben conducted a focus group with 11 undocumented students from various CCC, CSU, UC and private non-profit university campuses. Raben invited students to share their experiences and ideas for increasing access to financial aid for undocumented students. Participating students' identities are not included in this report in order to protect their privacy.

In addition, supplemental informational interviews were conducted with legal experts and immigrant rights organizations to better understand current policy and legal efforts to support undocumented students, in California and nationally, with applying for and receiving financial aid and lessening the financial burden of pursuing higher education. See Appendix C for the full list of interview participants.

Lastly, CSAC and Raben organized a listening session with staff from the California Student Opportunity and Access Program (Cal-SOAP) and Regional Coordinating Organizations (RCOs), two programs that operate across California with funding from CSAC to engage in outreach and offer financial aid application assistance to K-12 schools. The listening session explored challenges and best practices on topics including access to financial aid information in high schools, resources and trainings needed by Cal-SOAP and RCOs, and ways to improve partnerships with school districts to better serve undocumented students.

Work group discussion topics

- **College Affordability for Undocumented Students:** General overview and discussion of challenges to accessing information about, applying for, and receiving financial aid
- **Administrative and Technical Solutions when Applying for Financial Aid:** Simplifying CADAA, AB 540 affidavit and Promise Grant application; improving information access and clarity on the CSAC website
- **Campus Policies and Best Practices for Awarding Financial Aid:** Models for guiding undocumented students through the financial aid process; improving coordination and communication among admissions, financial aid offices, and Dream Resource Centers; improving resources and trainings for campus administrators
- **Policy Levers to Increase College Affordability:** State policy proposals to expand financial aid for undocumented students, innovative approaches to work authorization and college affordability; improvements to CADAA
- **Additional Challenges, Possibilities, and Best Practices:** Specific challenges of students from mixed-status households, support and resources to improve intra- and inter-campus coordination; expanding post-graduate employment opportunities; facilitating information access through community organizations
- **Review of Affordability Challenges and Recommendations:** Access to information and outreach; navigating the application process; campus resources and support, receiving financial aid

Appendix B

CSAC Commissioners

- **Charles Nies** – Commission Vice Chair and Vice Chancellor for Student Affairs, University of California, Merced
- **Alexis Takagi** – Student Commissioner and Doctoral Student, Santa Clara University School of Education and Counseling Psychology
- **Leonardo Rodriguez** – Former Student Commissioner and Trustee, Mendocino College and Student, University of California, Berkeley
- **Steve Ngo** – Former Commissioner and Partner, Lozano Smith LLP

CSAC Staff

- **Marlene Garcia** – Executive Director
- **Catalina Mistler** – Chief Deputy Executive Director
- **Jake Brymner** – Deputy Director of Policy and Public Affairs
- **Daniela Rodriguez** – Policy Analyst
- **Rosa De Anda** – Policy Consultant
- **Julia Blair** – General Counsel
- **Mark Paxson** – Senior Attorney
- **Tae Kang** – Deputy Director for Program Administration & Services
- **Alessandra Morrison** – Assistant Deputy Director for Programs
- **Javier Argüello** – Manager, Institutional Support Unit
- **Austin Robbins** – Information Technology Associate, System Requirements & Testing Unit

Financial Aid Administrators

- **Elizabeth Alaniz** – Associate Director of Financial Aid and Scholarship Office, California State University, Chico
- **Shawn Brick** – Executive Director, Student Financial Support, University of California Office of the President (UCOP)
- **Patricia Jiménez de Valdez** – Financial Aid Officer, American River College

Legal Services

- **Anna Manuel** – Director of Strategic Initiatives & Staff Attorney, University of California Immigrant Legal Services Center

Undocumented Student Liaisons

- **Enrique Campos** – Program Director, Undocumented Student Program, University of California, Los Angeles
- **Alejandra Garcia** – Project Specialist, Dreamer Center, Southwestern Community College
- **Diana Hernández Banderas** – Assistant Director of Undergraduate Admissions & Coordinator of DREAMer Support, California Lutheran University
- **Erik Ramirez** – Director, Equity and Affinity Centers, Sacramento State University
- **Jessica Zaldana** – Financial Aid Technician & Dream Resource Center Lead, Los Angeles City College

Students

- **Andrea Ramos Castro** – Student, University of California, Riverside
- **Dixie Samaniego** – Student, California State University, Fullerton and Vice President of Systemwide Affairs, California State Student Association (CSSA)

Policy Experts

- **Nikki Dominguez** – Educational Equity Director, Asian Americans Advancing Justice Los Angeles
- **Marisela Hernandez** – Senior Specialist, Foundation for California Community Colleges
- **Nancy Jodaitis** – Director, Higher Education Initiatives, Immigrants Rising
- **Katrina Linden** – Public Affairs Director, The Campaign for College Opportunity and Facilitator, California Undocumented Student Higher Education Coalition
- **Rita Medina** – Deputy Director, State Policy & Advocacy, Coalition for Humane Immigrant Rights (CHIRLA)
- **Marcos Montes** – Policy Director, Southern California College Access Network (SoCal CAN)
- **Emmanuel ‘Manny’ Rodriguez** – California Director of Policy & Advocacy, The Institute for College Access & Success (TICAS)
- **Christopher Sanchez** – Policy Advocate, Western Center on Law & Poverty

Appendix C

Interview Participants

- **Ahilan Arulanantham** – Professor from Practice and Co-Director of the Center for Immigration Law and Policy at UCLA School of Law
- **Maria Blanco** – Former Executive Director, UC Immigrant Legal Services Center
- **Tanya Broder** – Senior Staff Attorney, National Immigration Law Center (NILC)
- **Cynthia Buiza** – Executive Director, California Immigrant Policy Center (CIPC)
- **Miriam Feldblum** – Co-Founder and Executive Director, Presidents' Alliance on Higher Education and Immigration
- **Ignacia Rodriguez** – Immigration Policy Advocate, National Immigration Law Center (NILC)



Endnotes

1. Immigrants in California, 2019, <https://www.ppic.org/publication/immigrants-in-california>
2. While AB 540 has enabled thousands of undocumented students to pursue higher education, it is important to also note that this pathway to exemptions from nonresident tuition rates is also available to U.S. citizens; “AB 540 student” is often used synonymously with “undocumented students,” but in fact includes other students that meet criteria and are seeking more affordable tuition rates.
3. Assembly Bill 131, http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0101-0150/ab_131_cfa_20110621_121323_sen_comm.html
4. 2021–22 California Student Aid Commission Data
5. 2021–22 California Student Aid Commission Data
6. 2021–22 California Student Aid Commission Data
7. Immigrants in California, 2019, <https://www.ppic.org/publication/immigrants-in-california>
8. New Americans in California, American Immigration Council, 2020, https://www.americanimmigrationcouncil.org/sites/default/files/research/immigrants_in_california.pdf
9. Obama White House, Deferred Action for Childhood Arrivals: Who Can Be Considered? 2012, <https://obamawhitehouse.archives.gov/blog/2012/08/15/deferred-action-childhood-arrivals-who-can-be-considered>
10. National Immigration Law Center, Supreme Court Overturns Trump Administration’s Termination of DACA, 2020, <https://www.nilc.org/issues/daca/alert-supreme-court-overturns-trump-administrations-termination-of-daca>
11. Informed Immigrant, DACA Decision at the Supreme Court 2020, https://www.informedimmigrant.com/resources/daca/daca-decision-2020/#accordion__heading-Supreme-Court-Decision
12. Department of Homeland Security, Department of Homeland Security Will Reject Initial Requests for DACA As It Weighs Future of the Program, 2020, <https://www.dhs.gov/news/2020/07/28/department-homeland-security-will-reject-initial-requests-daca-it-weighs-future>
13. The White House, Preserving and Fortifying Deferred Action for Childhood Arrivals, 2021, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/preserving-and-fortifying-deferred-action-for-childhood-arrivals-daca>
14. United States District Court Southern District of Texas, State of Texas v. US, Karla Perez, State of New Jersey, 2021, <https://s3.documentcloud.org/documents/21010983/7-16-21-texas-v-us-opinion.pdf>
15. United States Court of Appeals for the Fifth Circuit, 2022, <https://s3.documentcloud.org/documents/23119347/daca-ruling.pdf>
16. FWD.us, The Post-DACA Generation is Here, 2022, <https://www.fwd.us/news/undocumented-high-school-graduates>
17. FWD.us, What Happens if DACA Ends, 2022, <https://www.fwd.us/news/what-if-daca-ends/#:~:text=California%20and%20Texas%2C%20home%20to,of%20their%20jobs%20each%20month>

18. AB 540, 2001, http://www.leginfo.ca.gov/pub/01-02/bill/asm/ab_0501-0550/ab_540_bill_20011013_chaptered.html
19. AB 130, 2011, http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0101-0150/ab_130_bill_20110725_chaptered.html
20. AB 131, 2011, http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0101-0150/ab_131_bill_20110527_amended_asm_v95.html
21. AB 1899, 2012, http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_1851-1900/ab_1899_cfa_20120526_013431_asm_floor.html
22. AB 2000, 2014, <https://openstates.org/ca/bills/20132014/AB2000/>
23. SB 1210, 2014, http://www.leginfo.ca.gov/pub/13-14/bill/sen/sb_1201-1250/sb_1210_bill_20140828_enrolled.html
24. SB 1141, 2022, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB1141
25. California Student Aid Commission, Dream Act Service Incentive Grant, <https://www.csac.ca.gov/california-dream-act-service-incentive-grant-program>
26. AB 1895, 2018, <https://openstates.org/ca/bills/20172018/AB1895>
27. SB 68, 2017, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB68
28. California Student Aid Commission, Dream Act Service Incentive Grant, <https://www.csac.ca.gov/california-dream-act-service-incentive-grant-program>
29. California Volunteers, College Corps, <https://www.californiavolunteers.ca.gov/californiansforall-college-corps>
30. California Student Aid Commission, Learning-Aligned Employment Program (LAEP), <https://www.csac.ca.gov/learning-aligned-employment-program>
31. The Campaign for College Opportunity, In Their Voices: Undocumented in California Public Colleges and Universities, 2019, <https://collegecampaign.org/portfolio/in-their-voices>
32. The UC system provides institutional aid through its Blue and Gold Opportunity Program to enrolled undocumented students to supplement for federal financial aid. However, the majority of undocumented students are enrolled in CSUs and CCCs which do not currently have a parallel system wide program.
33. The estimate of 94,030 undocumented students is based on pre-COVID data. Based on trends in post-COVID financial applications, it is very likely fewer undocumented students were enrolled in the 2021–2022 academic year compared to 2019–2020.
34. 2021–22 California Student Aid Commission Data
35. NASFAA | ED Announces Improvements in FAFSA Verification at FSA Training Conference: https://www.nasfaa.org/news-item/20271/ED_Announces_Improvements_in_FAFSA_Verification_at_FSA_Training_Conference
36. Persisting Inequalities and Paths Forward: A Report on the State of Undocumented Students in California’s Public Universities, UC Collaborative to Promote Immigrant and Student Equity (UC PromISE) and the Undocumented Student Equity Project (USEP), 2020, https://cpb-us-e2.wpmucdn.com/sites.uci.edu/dist/4/3807/files/2020/12/State_Of_Undocumented_Students_2020report.pdf
37. California Student Aid Commission 2018–19 Student Expenses and Resources Survey: Initial Insights An Initial Look at the Obstacles Students Face Affording Higher Education V4, 2019, https://www.csac.ca.gov/sites/main/files/file-attachments/2018-19_student_expenses_and_resources_survey_web.pdf

38. California Student Aid Commission, COVID-19 Survey, 2020, https://www.csac.ca.gov/sites/main/files/file-attachments/2020_covid19_student_survey.pdf
39. Persisting Inequalities and Paths Forward: A Report on the State of Undocumented Students in California's Public Universities, UC Collaborative to Promote Immigrant and Student Equity (UC PromISE) and the Undocumented Student Equity Project (USEP), 2020, https://cpb-us-e2.wpmucdn.com/sites.uci.edu/dist/4/3807/files/2020/12/State_Of_Undocumented_Students_2020report.pdf
40. Immigrant Legal Resource Center, Public Charge, <https://www.ilrc.org/public-charge>
41. New Americans in California, American Immigration Council, 2019, <https://map.americanimmigrationcouncil.org/locations/california/#>
42. The work group and this report focus on college affordability for undocumented students at the undergraduate level. Undocumented graduate students face a unique set of financial challenges, but these issues are not within the scope of this research.



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