

# Burden Reduction Strategies to Improve Equity in Program Access

Elizabeth Bell

The University of Texas, Austin

LBJ School of Public Affairs

[Elizabeth.bell@austin.utexas.edu](mailto:Elizabeth.bell@austin.utexas.edu)

&

Academic Affiliate

Office of Evaluation Sciences

# Motivation

Persistent disparities in program access for marginalized communities.

- One driver of disparity is administrative burden—the learning, compliance & psychological costs in application process.
  - Disproportionately impacts marginalized communities (i.e., disabled, racialized groups, low-income, non-cisgender) & access to assistance is stratified (e.g., Nisar 2017; Bell et al., 2023; Bell et al., 2024; Bell and Smith 2022; Heinrich et al., 2023; Christensen et al., 2021; Barnes, 2020; Chudnovsky & Peeters, 2020)
- Question remains: How can public managers reduce disparities in program access?

# Burden Reduction Framework

**Table 1.** Administrative burden reduction strategies.

Dimension	Strategy	Description
Distributive	Shifting	Shifting the formal duty of enrolling or meeting administrative rules and requirements from the individual to the state or third parties (e.g., employers).
	Sharing	Helping individuals enroll or meet the administrative rules and requirements by providing, or publicly funding, assistance services or by regulating the private market of these services to make them more affordable.
Intensive-ness	Discarding	Reducing the number of steps by removing substantive or administrative requirements needed for receiving the benefit.
	Simplifying	Making it easier to meet a substantive or administrative requirement needed for receipt of the benefit.
	Expediting	Speeding up receipt of the benefit by accelerating the administrative process or by establishing presumptive eligibility.
Relational	Communicating	Increasing the availability and quality of information and feedback in interactions between individuals and the state.
	Respecting	Making state–individual interactions more welcoming and respectful by increasing autonomy and worth and minimizing intrusiveness and humiliation.

Benish, A., Tarshish, N., Holler, R., & Gal, J. (2024). Types of administrative burden reduction strategies: Who, what, and how. *Journal of Public Administration Research and Theory*, 34(3), 349–358. <https://doi.org/10.1093/jopart/muad028>

# Sharing/Investing in Assistance

- Access to assistance is stratified & may be critical to reducing burdens & improving equity (e.g., Heinrich et al., 2022; Bell & Smith 2022)
- **Research Question:** *How does increasing the number of school counselors in schools impact student access to burdensome means-tested college financial aid?*
  - We predict increasing the number of counselors will disproportionately benefit low-income students of color, by reducing the need to triage & improving access to assistance for those most in need.
    - Recent evidence suggests that workload matters for likelihood of discrimination among street-level bureaucrats (Guul, Pedersen, and Petersen 2021; Andersen and Guul 2019; Guul, Villadsen, and Wulff 2019; Assouline et al., 2021)

# “Too few counselors”

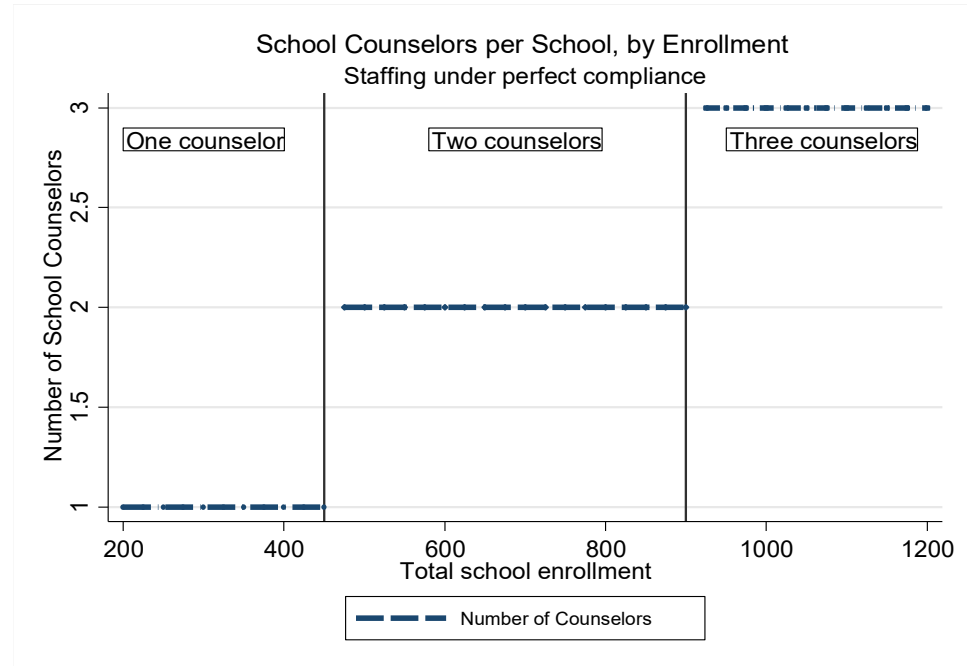


American School Counselor Association recommends a 250-1 student-counselor ratio

- National average: 491-1
- Black students and low-income students are more likely to attend a school that does not have a school counselor

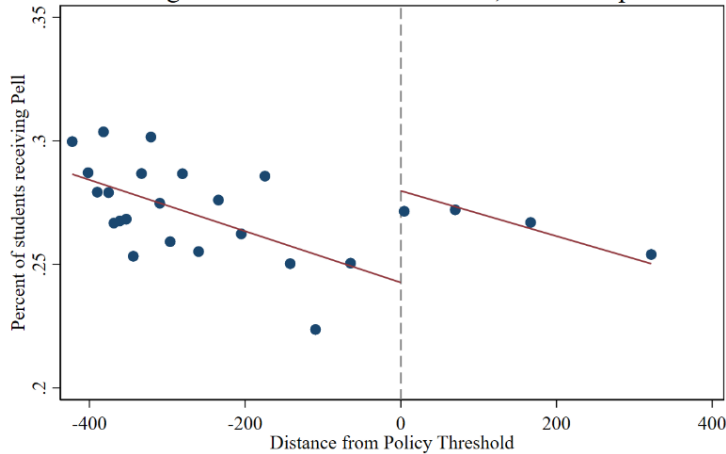
We leverage Oklahoma Staffing Policy, which mandates 450:1 ratio, to conduct a regression discontinuity design

- Rich administrative data on school staffing and on student access to financial aid for college (including Federal Pell Grant and Oklahoma’s Promise)



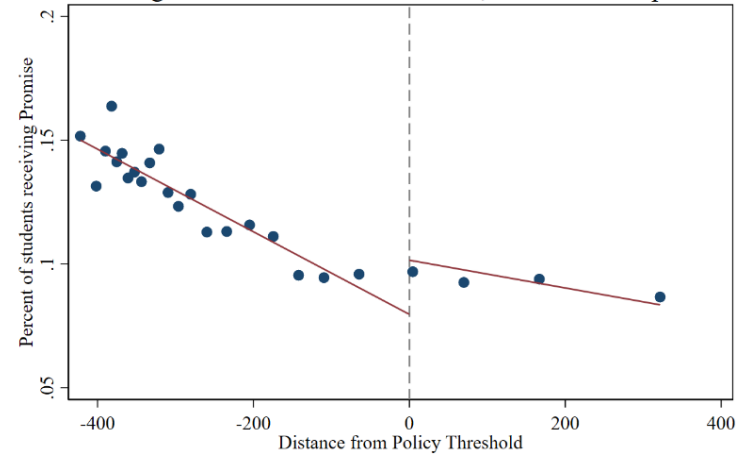
# Additional Counselors Improve Program Access

Figure 3a: Reduced Form Effect, Pell Receipt



Notes: Reduced form discontinuity, percent receiving Pell: 0.036 (0.012)\*\*\*, N= 4155

Figure 3b: Reduced Form Effect, Promise Receipt



Notes: Reduced form discontinuity, percent receiving Promise: 0.017 (0.005)\*\*\*, N= 4155

Under perfect compliance, we estimate a **32-**  
**percentage point** increase in Pell receipt and **15-**  
**percentage point** increase in Promise receipt from  
hiring a full 1.0 FTE counselor

Effects driven entirely by low-income Black, Hispanic,  
& Native students

# Conclusion

Burden reduction strategies need to consider not only overall effects, but for whom.

- Communications interventions are politically and economically feasible, but effects are limited, and may not help those who are most in need
- Even discarding burdens can result in widening inequity if sharing/assistance isn't present

Personalized assistance & increasing administrative capacity increases equity in program access, mitigating negative impacts of admin burden on equity

- Similar findings in studies that examine FAFSA completion—nudges limited but assistance has large impacts

Future research:

1. How can we reduce psychological costs and improve trust in government?
  - Investigate whether trauma-informed training & operations can help.
2. What combination of strategies is most effective for improving *equity* in access?
  - How can we better diagnose the root cause of burden so that we align solutions to problem

# Thank you!

[Elizabeth.bell@austin.utexas.edu](mailto:Elizabeth.bell@austin.utexas.edu)



# Admin Burden in College Financial Aid

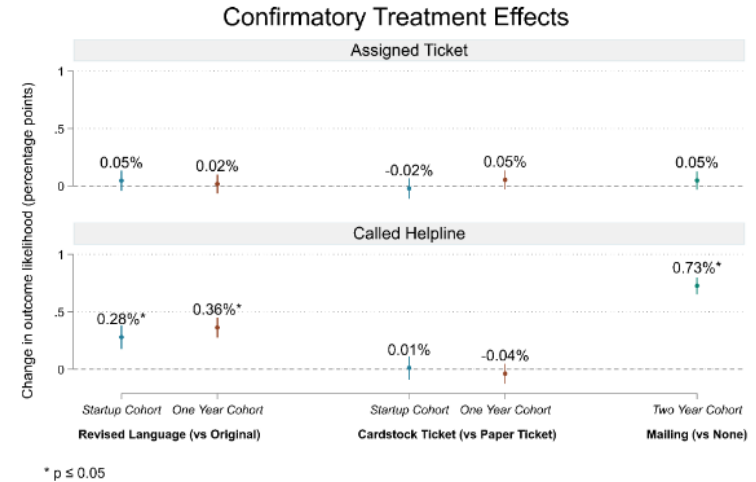
- **Administrative burdens in aid apps reduce equity in access** (Nisar 2020; Herd & Moynihan 2018; Christensen et al. 2020; Baekgaard et al. 2020; Deshpande and Li, 2019).
  - 35-50% of high school students fail to complete the notoriously burdensome FAFSA
  - Lower/middle income students lose estimated \$9,700 in grant and loan aid annually (Bird et al., 2019)
  - In aggregate, this complexity carries a \$4 billion price tag each year (Dynarski & Scott-Clayton, 2006)
- **School counselors may provide critical support to students navigating complexity** (Barnes, 2020; Bell et al., 2020; Maynard-Moody & Musheno, 2003; Mulhern, 2019; Wiley & Berry, 2018).

# Reducing burdens with behaviorally informed communications

## Ticket to Work

- Increased calls to helpline
- No increase in take-up for Ticket to Work, an employment support program for people with disabilities on SSI/SSDI

**Figure 2.** Redesigned mailings did not increase Ticket assignments, but had a small impact on Helpline calls



**Table 4: Effect of Counselor Staffing on Financial Aid Receipt, by Cohort**

		Pre-2008						Post-2008					
				First Stage						First Stage			
		Reduced Form				2SLS		Reduced Form				2SLS	
Received Pell, Count	All Students	-0.367 (2.852)	0.898	0.178 (0.098)	0.069	-5.151 (40.370)	0.900	6.233 (1.764)	0.000	0.155 (0.053)	0.004	50.791 (23.341)	0.039
	White	-0.526 (1.910)	0.783			-7.368 (28.996)	0.802	0.931 (0.984)	0.344			7.568 (8.492)	0.381
	Black	0.518 (0.909)	0.569			7.228 (17.106)	0.677	1.908 (0.813)	0.019			15.554 (8.885)	0.092
	Hispanic	-0.403 (0.357)	0.259			-5.631 (9.216)	0.548	0.543 (0.233)	0.020			4.425 (2.494)	0.088
	Native	0.879 (0.956)	0.358			12.262 (19.695)	0.541	2.627 (0.693)	0.000			21.418 (9.209)	0.028
	Received Promise, Count	All Students	-0.586 (1.185)	0.621			-8.202 (19.605)	0.680	1.518 (0.631)	0.016			12.364 (6.980)
	White	-0.251 (0.950)	0.792			-3.520 (14.127)	0.806	0.247 (0.419)	0.557			2.006 (3.545)	0.576
	Black	0.051 (0.242)	0.834			0.708 (3.683)	0.849	0.398 (0.194)	0.041			3.240 (2.004)	0.118
	Hispanic	0.215 (0.180)	0.233			2.994 (4.974)	0.554	0.258 (0.124)	0.038			2.099 (1.289)	0.116
	Native	-0.163 (0.393)	0.679			-2.271 (6.571)	0.733	0.590 (0.243)	0.016			4.814 (2.586)	0.074
	N observations	1,133						3,022					

## Effects among Black, Hispanic, & Native students

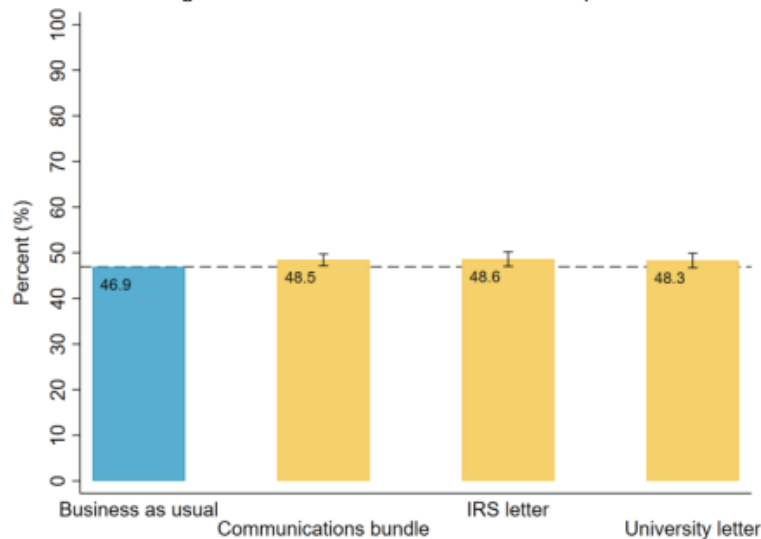
Concentrated in years post burden expansion in Promise program

# Reducing burdens with behaviorally informed communications

## American Opportunity Tax Credit (AOTC)

- 1.5 ppt increase in take-up of AOTC
- No effects on low-income students, who disproportionately do not take-up AOTC

Figure 2. Effect of outreach on AOTC take-up



# Simplifying & Discarding

## Small Business COVID-19 relief funds

- Evaluated city policy change that reduced documentation requirements in the middle of program roll out of COVID-19 small business relief funds
- Improved access for underserved (minority, women, disabled, and veterans) small businesses
  - but disproportionately helped non-underserved (white, men, non-disabled, non-veterans)

# Conclusion

Reducing SLB workload increases equity in program access, potentially mitigating the negative impacts of administrative burden on equity

- Administrative burdens could contribute to racial disparities not only by imposing costs, but also by enhancing complexity/ambiguity, which creates room for discrimination

Mechanisms: 1) workload 2) new counselors shift organizational culture 3) new counselors share lived experiences of students and engage in active representation

Burdens could be so high that even an expansion in SLB capacity might not expand access for the most disadvantaged, esp if some reqs are out of their control

# Data

- Administrative data from the Oklahoma State Regents for Higher Education, and Oklahoma State Board of Education (2005-2015)
  - Program access for Oklahoma's Promise & Pell Grant
  - Number of counselors/counselor FTE
  - Controls: professional staff FTE, administration FTE, teacher FTE
- Merged in data from the National Center for Education Statistics
  - School level controls (e.g. percent in FRL, percent in special education, racial diversity, etc.)

# Oklahoma's Promise & Pell Grant

Pell Grant requires FAFSA completion, which many low-income and racially minoritized students struggle to complete

Oklahoma Promise program long-standing – created in 1992 & expanded burden in 2007

- Early application/commitment (by 10<sup>th</sup> grade)
- First dollar, AGI  $\leq$  \$55,000
- 2.5 high school GPA and curriculum requirements
- Virtue commitment
- High administrative burden (Bell & Smith, 2020; Rosinger, Meyer, & Wang, 2021)
- Counselors disseminate info, monitor student progress, & certify compliance





# Effect of Counselor Capacity on Aid Access

- H1: Across specifications, increased counselor staffing increases aid access

**Table 3: Reduced form and 2SLS**

	Below Mean	Reduced Form	2SLS	
			Full Sample/ No Bandwidth	Policy Bandwidth <i> si </i> 225
Received Pell, Percent	0.272	0.036 ** (0.012)	0.322 + (0.169)	0.125 (0.099)
Received Pell, Count	10.886	4.342 ** (1.530)	38.744 * (19.582)	12.901 (10.737)
Received Promise, Percent	0.127	0.017 * (0.005)	0.152 + (0.079)	0.040 (0.040)
Received Promise, Count	4.765	0.866 (0.559)	7.703 (5.864)	2.094 (4.058)
N observations		4155	4155	1528
N schools		385	385	170

**Table C3: Adding School Fixed Effects**

	Below Mean	Reduced Form	2SLS	
			Full Sample/ No Bandwidth	Policy Bandwidth <i> si </i> 225
Received Pell, Percent	0.272	0.068 *** (0.019)	0.462 * (0.199)	0.440 + (0.232)
Received Pell, Count	10.886	7.695 *** (2.188)	52.024 * (22.695)	60.293 + (31.300)
Received Promise, Percent	0.127	0.026 *** (0.007)	0.173 * (0.081)	0.179 + (0.099)
Received Promise, Count	4.765	2.587 *** (0.733)	17.500 * (8.130)	20.075 + (11.317)
N observations		4155	4155	1528
N schools		385	385	170

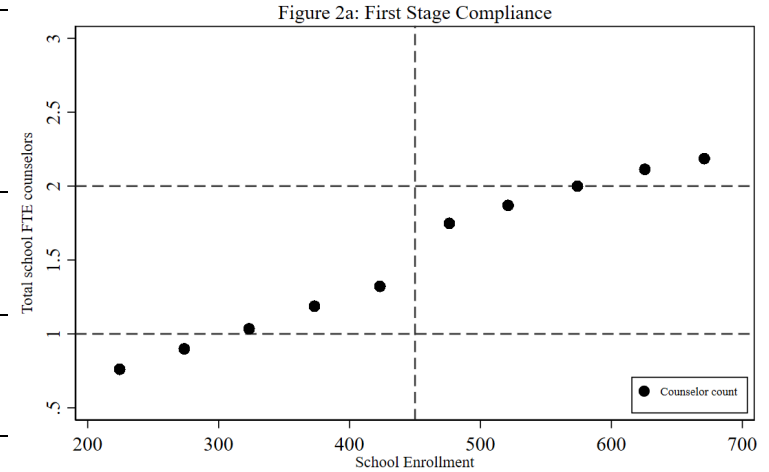
# Solutions to Burden: How do we advance equity in access?

- 1. Communicating & Respecting with Human-centered design (OES):**
  - Nudge RCT increased access to AOTC, but not among low-income students
  - Nudge RCT does not increase access to Ticket to Work program for people with disabilities on SSI/SSDI
- 2. Simplifying & Discarding:** How does reducing documentation requirements impact equity in access to COVID-19 small business relief funds?
  - Improved access for underserved (minority, women, disabled, and veterans) but disproportionately helped non-underserved (white, men, non-disabled, non-veterans)
- 3. Sharing:**
  - Access to assistance is currently stratified, but if we reduce SLB workload, we increase equity in access for intersectionally minoritized clients

**Table 2: First Stage Estimates, Overall and by School FRL**

		<i>BW</i>	Counselor FTE			Counselor Caseload		
			<i>n</i>	<i>Estimate</i>	<i>p-value</i>	<i>n</i>	<i>Estimate</i>	<i>p-value</i>
<i>Panel A</i>	Overall	Full	4155	0.16 (0.047)	0.001	3393	-80.68 (15.447)	0.000
		Policy	1369	0.26 (0.062)	0.000	1339	-39.13 (22.025)	0.076
		MSE	847	0.24 (0.104)	0.020	595	-21.92 (23.235)	0.346
<i>Panel B: By FRL</i>	Low-FRL schools	Full	2123	0.17 (0.054)	0.002	1748	-82.58 (16.680)	0.000
		Policy	853	0.25 (0.070)	0.000	830	-17.14 (19.959)	0.391
	High-FRL schools	Full	2032	0.14 (0.085)	0.103	1645	-68.30 (29.411)	0.020
		Policy	516	0.22 (0.113)	0.051	509	-65.89 (51.158)	0.198

*Notes:* Robust standard errors clustered on the running variable in parentheses. Policy bandwidth is +/-225; MSE bandwidth calculated using rdrobust in Stata. Counselor caseload represents the total enrollment in a school divided by number of counselors; schools with no counselors are therefore missing a counselor caseload value and dropped from caseload model. Includes year fixed effects.



*Notes:* The above figure shows school counselor staffing levels in Oklahoma public schools (*BW*: +/-225). *Binsize* = 50. First-stage linear discontinuity, counselor count: 0.271 (0.060)\*\*\*, *N* = 1493

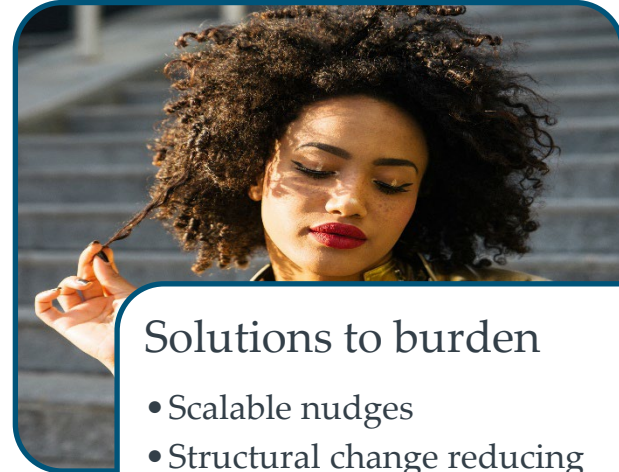
# Policy Compliance: First Stage

# Overview



## Causes of unequal distribution of burden

- *State factors:* administrative capacity, discrimination
- *Individual factors:* Race, health, gender, disability, administrative capital etc.



## Solutions to burden

- Scalable nudges
- Structural change reducing compliance costs
- Enhancing capacity of street-level bureaucrats

# Method: Regression Discontinuity

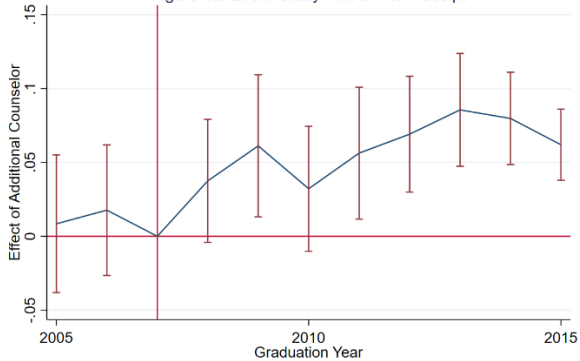
$$Staffing_{it} = \pi_0 + \pi_1(Distance_{it}) + \pi_2(Above_{it}) + \pi_3(Above_{it} * Distance_{it}) + \delta_t + \mu_{it} \quad (1)$$

$$Y_{it} = \gamma_0 + \gamma_1(Distance_{it}) + \gamma_2(Above_{it}) + \gamma_3(Above_{it} * Distance_{it}) + \delta_t + v_{it} \quad (2)$$

$$Y_{it} = \beta_0 + \beta_1(Staffing_{it}) + \beta_2(Distance_{it}) + \beta_3(Above_{it} * Distance_{it}) + \delta_t + \varepsilon_{it} \quad (3)$$

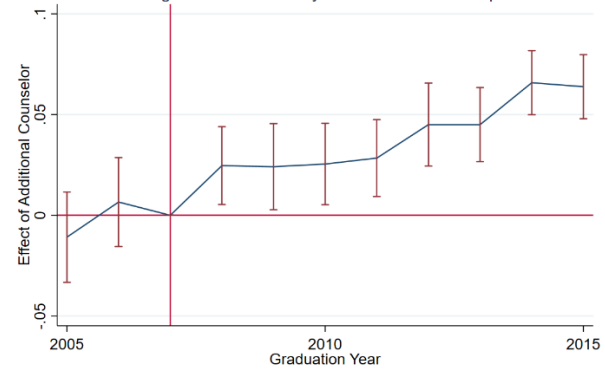
- $Distance_{st}$ : Enrollment<sub>st</sub> – Threshold
- $Above_{st}$ : Indicator for Enrollment<sub>st</sub> > Threshold
- $Staffing_{st}$ : Counselor staffing in school in given year
- $Y_{st}$ : School-level outcomes for aid access
- Controls: Includes school-level demographics (urbanicity, enrollment by race, share of students receiving special education, share of students on free or reduced price lunch), staffing information (teacher and administrator count), and district labor market indicators (district unemployment rate, share in poverty, and average income). Also include year fixed effects.

Figure 4a: Event Study Plot of Pell Receipt



Note: Plots the event study estimates of additional counselor effect pre and post Promise administrative burden increase in 2008. Pre-policy year (2007) effect set to zero.

Figure 4b: Event Study Plot of Promise Receipt



Note: Plots the event study estimates of additional counselor effect pre and post Promise administrative burden increase in 2008. Pre-policy year (2007) effect set to zero.

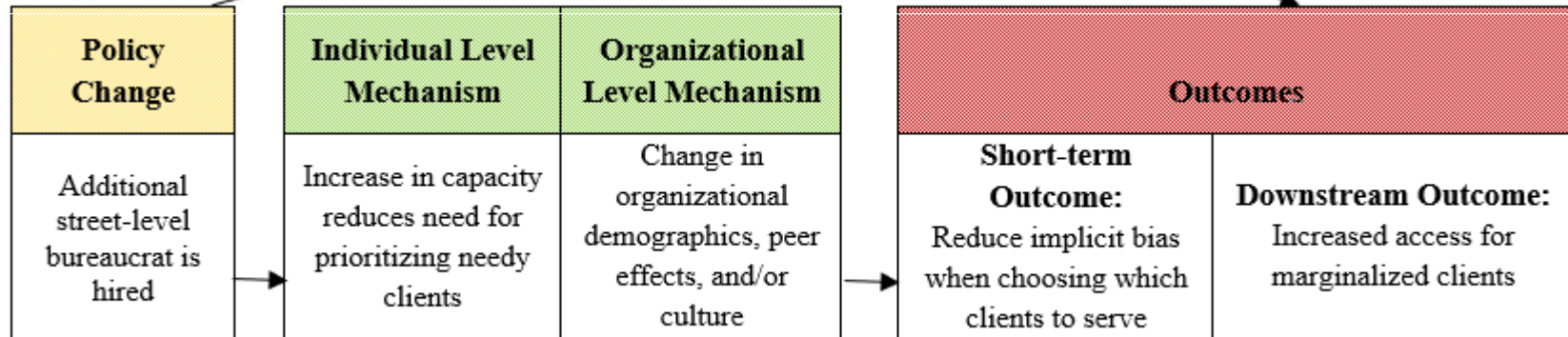
# Theoretical Model & Hypotheses

*H1: Increasing the number of school counselors will positively impact the proportion of low-income students receiving burdensome means-tested financial aid.*

*H2: Increasing the number of school counselors will positively impact the number of low-income and racially marginalized students receiving financial aid.*

<b>H3: Moderator: Level of Administrative Burden</b>	
<i>Ambiguity</i>	<i>Complexity</i>
Increases in the number of program requirements create ambiguity in eligibility	Increase the time and effort required to evaluate eligibility

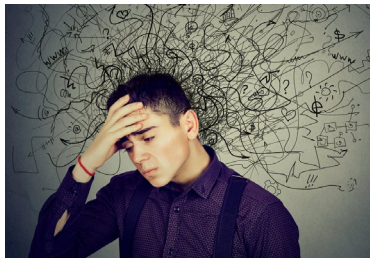
*H3: The impacts of reducing counselors' workload on low-income students will be concentrated in the years following expansions in administrative burden.*



# Unequal Distribution of Burdens

## *Individual Factors*

- Across 3 cases, health problems (i.e. ADHD/ADD, anxiety/depression, & pain) increased burdens & loss of access



## *State Factors*

- For-profit colleges imposed more burden, while public colleges & MSIs reduced burdens in HEERF



# Regression Discontinuity Assumptions

- » Manipulation Test ✓
  - » Density at Threshold ✓
  - » Observables Smooth at the Threshold ✓
  - » Fidelity of Program Rule ✓
    - » Fuzzy Design
    - » Strong first-stage discontinuity at threshold
-

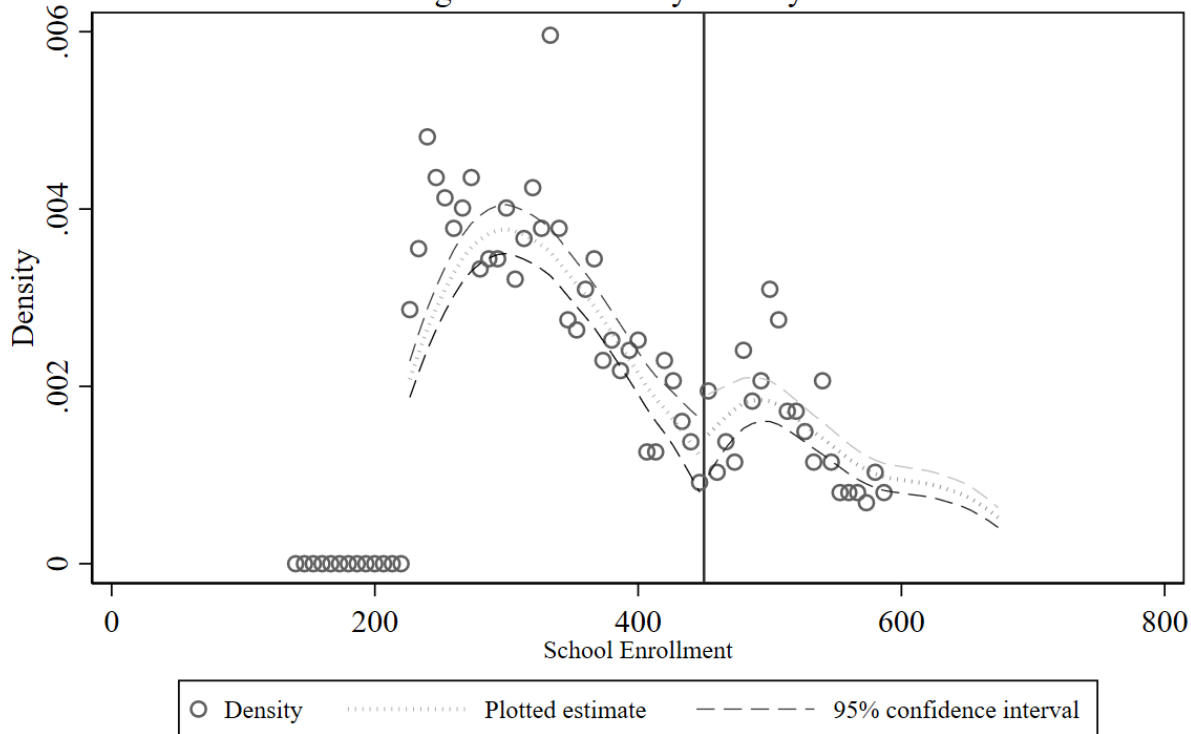
**Table 1: Sample**

				Discontinuity	
	Overall	Below	Above	Full Sample/No Bandwidth	Policy Bandw  si  225
<i>Student Characteristics</i>					
% Free or Reduced Lunch	0.57	0.58	0.51	0.05 *** (0.016)	0.05 ** (0.022)
% Special Education	0.16	0.17	0.14	0.02 *** (0.004)	0.01 + (0.006)
% Asian	0.01	0.01	0.01	0.00 + (0.001)	0.00 (0.002)
% Black	0.04	0.04	0.08	-0.01 (0.015)	0.00 (0.023)
% Hispanic	0.07	0.07	0.08	0.02 *** (0.007)	0.02 ** (0.008)
% Native	0.24	0.24	0.24	-0.01 (0.013)	0.03 + (0.018)
% White	0.64	0.65	0.58	0.00 (0.016)	-0.05 * (0.023)
<i>School Characteristics</i>					
Enrollment	227.34	163.75	610.11	0.00 * (0.000)	0.00 (0.000)
Counselor FTE	0.77	0.54	2.13	0.16 *** (0.047)	0.26 *** (0.062)
Teacher FTE	15.25	11.84	35.78	1.56 *** (0.287)	1.41 *** (0.404)
Special Education FTE	1.50	1.02	4.37	0.08 (0.139)	-0.14 (0.202)
Professional Staff FTE	0.79	0.62	1.86	-0.05 (0.084)	0.05 (0.116)
Administration FTE	1.26	0.97	3.04	0.14 * (0.070)	0.04 (0.101)
N School Observations	4155	3563	592	4155	1369
N Unique Schools	385	338	69	385	159

	Discontinuity							Discontinuity																	
				<i>Full Sample/No</i>				<i>Policy Bandwidth</i>							<i>Full Sample/No</i>				<i>Policy Bandwidth</i>						
	Overall	Below	Above	<i>Bandwidth</i>		<i> s </i> 225		Overall	Below	Above	<i>Bandwidth</i>		<i> s </i> 225		Overall	Below	Above	<i>Bandwidth</i>		<i> s </i> 225					
<i>Student Characteristics</i>								<i>Student Characteristics</i>																	
% Free or Reduced Lunch	0.57	0.58	0.51	0.05 ***	0.05 **	(0.016)	(0.022)	% Free or Reduced Lunch	0.57	0.58	0.51	0.01	(0.014)	(0.010)	% Free or Reduced Lunch	0.57	0.58	0.51	0.01	(0.014)	(0.010)				
% Special Education	0.16	0.17	0.14	0.02 ***	0.01 +	(0.004)	(0.006)	% Special Education	0.16	0.17	0.14	0.02 **	(0.005)	(0.005)	% Special Education	0.16	0.17	0.14	0.02 **	(0.005)	(0.005)				
% Asian	0.01	0.01	0.01	0.00 +	0.00	(0.001)	(0.002)	% Asian	0.01	0.01	0.01	0.00	(0.001)	(0.001)	% Asian	0.01	0.01	0.01	0.00	(0.001)	(0.001)				
% Black	0.04	0.04	0.08	-0.01	0.00	(0.015)	(0.023)	% Black	0.04	0.04	0.08	0.01 **	(0.005)	(0.004)	% Black	0.04	0.04	0.08	0.01 **	(0.005)	(0.004)				
% Hispanic	0.07	0.07	0.08	0.02 ***	0.02 **	(0.007)	(0.008)	% Hispanic	0.07	0.07	0.08	-0.01	(0.004)	(0.004)	% Hispanic	0.07	0.07	0.08	-0.01	(0.004)	(0.004)				
% Native	0.24	0.24	0.24	-0.01	0.03 +	(0.013)	(0.018)	% Native	0.24	0.24	0.24	0.02 *	(0.008)	(0.008)	% Native	0.24	0.24	0.24	0.02 *	(0.008)	(0.008)				
% White	0.64	0.65	0.58	0.00	-0.05 *	(0.016)	(0.023)	% White	0.64	0.65	0.58	-0.02 **	(0.008)	(0.008)	% White	0.64	0.65	0.58	-0.02 **	(0.008)	(0.008)				
<i>School Characteristics</i>								<i>School Characteristics</i>																	
Enrollment	227.34	163.75	610.11	0.00 *	0.00	(0.000)	(0.000)	Enrollment	227.34	163.75	610.11	0.00	(0.000)	(0.000)	Enrollment	227.34	163.75	610.11	0.00	(0.000)	(0.000)				
Counselor FTE	0.77	0.54	2.13	0.16 ***	0.26 ***	(0.047)	(0.062)	Counselor FTE	0.77	0.54	2.13	0.19 ***	(0.061)	(0.060)	Counselor FTE	0.77	0.54	2.13	0.19 ***	(0.061)	(0.060)				
Teacher FTE	15.25	11.84	35.78	1.56 ***	1.41 ***	(0.287)	(0.404)	Teacher FTE	15.25	11.84	35.78	1.74 ***	(0.516)	(0.521)	Teacher FTE	15.25	11.84	35.78	1.74 ***	(0.516)	(0.521)				
Special Education FTE	1.50	1.02	4.37	0.08	-0.14	(0.139)	(0.202)	Special Education FTE	1.50	1.02	4.37	0.34 +	(0.186)	(0.166)	Special Education FTE	1.50	1.02	4.37	0.34 +	(0.186)	(0.166)				
Professional Staff FTE	0.79	0.62	1.86	-0.05	0.05	(0.084)	(0.116)	Professional Staff FTE	0.79	0.62	1.86	-0.04	(0.112)	(0.128)	Professional Staff FTE	0.79	0.62	1.86	-0.04	(0.112)	(0.128)				
Administration FTE	1.26	0.97	3.04	0.14 *	0.04	(0.070)	(0.101)	Administration FTE	1.26	0.97	3.04	-0.01	(0.105)	(0.112)	Administration FTE	1.26	0.97	3.04	-0.01	(0.105)	(0.112)				
N School Observations	4155	3563	592	4155	1369			School Fixed Effects																	
N Unique Schools	385	338	69	385	159			N School Observations	4155	3563	592	4155	1369	N School Observations	4155	3563	592	4155	1369	N Unique Schools	385	338	69	385	159

# Checking for Manipulation

Figure A1: McCrary Density Test

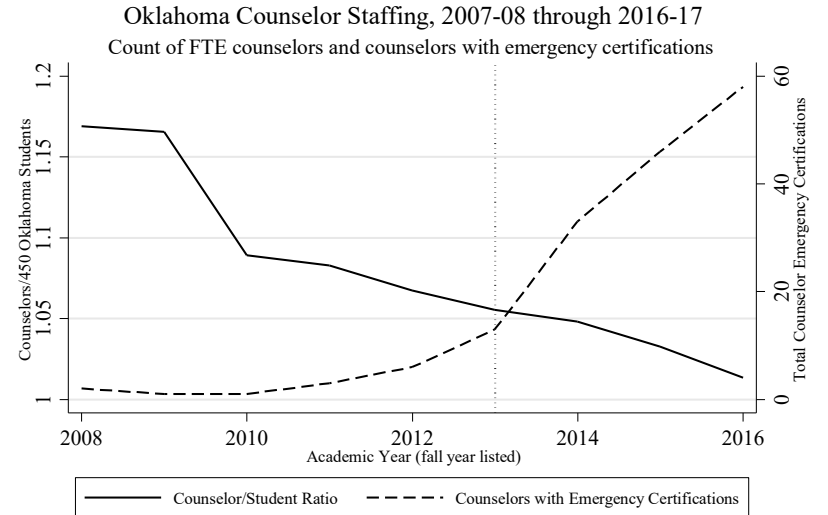


Note: Bin size = 6.67  
 Discontinuity estimate 0.163 (SE: 0.266)

# Policy Compliance: Overall Staffing

School Characteristics				
	Overall	Below	Above	Discontinuity
<b>Enrollment</b>	227.04	163.86	610.40	0.00* (0.000)
<b>Counselor FTE</b>	0.77	0.55	2.13	0.18*** (0.046)
<b>Teacher FTE</b>	15.17	11.79	35.73	1.61*** (0.271)
<b>Special Education FTE</b>	1.49	1.02	4.33	0.09 (0.132)
<b>Professional Staff FTE</b>	0.79	0.62	1.87	-0.01 (0.082)
<b>Administration FTE</b>	1.26	0.97	3.04	0.15* (0.067)

\* $p < 0.05$ , \*\* $p < 0.01$ , \*\*\* $p < 0.001$



Notes: Counselor ratio represents the number of FTE counselors per thousand students enrolled in Oklahoma for a given year. Uses public data compiled from Oklahoma Department of Education state certificate counts, and school employee and school headcounts aggregated to the state level. Vertical line represents 2013-14 academic year.

# Why Would Counselor Staffing Matter?

## Potential Mechanisms:

- More time with each student/fewer students in caseload develop better relationships (Krueger & Whitmore, 2001)
- Engage in more resource-intensive practices (Grabowski et al., 2011)
- Reduction in discrimination (Auwarter & Arguete, 2008; Francis, Dimmitt, de Oliveira, 2018; Welsch & Winden, 2018; Andersen & Guul 2019)
- Peer effects – learning from colleagues (Jackson & Bruegmann, 2009) or increased productivity when being watched (Monsalve et al., 2014; Weisburst, 2018; MacDonald, Fagan, & Geller, 2016)
- Specialization of duties (e.g., one counselor manage all college applications, another all behavioral management)

May be especially important in accessing burdensome financial aid programs

# Sample & Validity

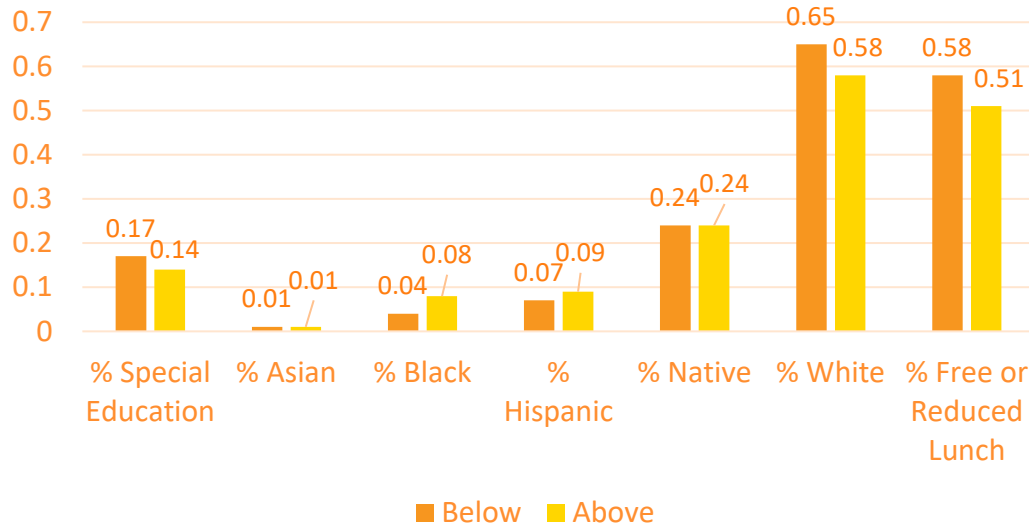
385

- Unique high schools merging to Promise data

161

- Unique high schools +/- 225

## Student Demographics



# Theoretical Framework

