

**Table 1:** A Framework for Equity-Driven Free College Policy

COMPONENT	RATIONALE	EXPLANATION/APPLICATION
<b>1. Helps low-income students cover living (i.e., non-tuition) costs</b>	Aid distributed to low-income students through free college programs should not be offset by the receipt of other aid. This so-called “last dollar” aid frequently has no benefit for low-income students enrolling at low-cost institutions. States can either opt to provide non-tuition restricted aid, waive tuition regardless of the receipt of other aid, or make free college scholarships “first dollar,” which ensures that award levels are not reduced by the receipt of other grant aid. In the latter case, non-tuition-restricted grants, including Pell Grants, in excess of the cost of tuition could be used to cover living expenses.	Programs do not meet the criteria if they provide aid that is tuition-restricted and reduced based on the receipt of other non-tuition-restricted aid. Programs that are offset by the receipt of federal Pell Grants do not meet the criteria regardless of their interactions with state, institutional, and private aid programs. Programs meet this criteria if they provide aid that can be used for living costs when tuition is paid through other sources, if they waive tuition regardless of the receipt of other aid, or if they provide aid that is not offset by the receipt of non-tuition restricted aid (i.e., “first dollar” aid). Providing minimum awards or covering specific expenses such as books, transportation, and supplies is not considered sufficient to meet this criteria.
<b>2. Covers the cost of fees (in addition to the cost of tuition)</b>	The cost of fees at public institutions can be substantial, and unexpected costs can derail low-income students pursuing college goals. To truly eliminate financial barriers and simplify postsecondary costs, free college programs should provide support for these hidden costs for all participating students.	Programs do not meet the criteria unless they cover at least some fees. Programs covering all fees, those covering only mandatory fees, and those covering other specified fees meet this criteria.
<b>3. Covers the cost of tuition for at least four years of college</b>	When states provide only two years of tuition, they risk tracking low-income students into programs that graduate fewer students and provide smaller economic payoffs, further exacerbating enrollment stratification and inhibiting social mobility.	Programs do not meet the criteria if they impose an eligibility cap of less than four years, eight semesters, or 120 credit hours, or if program eligibility ends after a bachelor’s degree-seeking recipient receives an associate degree or certificate.
<b>4. Covers the cost of tuition for bachelor’s degree programs at four-year institutions</b>	When states limit free college programs to two-year colleges or associate degree programs, they risk tracking low-income students into programs that graduate fewer students and provide smaller economic payoffs, further exacerbating enrollment stratification and inhibiting social mobility.	Programs do not meet the criteria unless they provide aid that is usable at four-year institutions and designed to cover at least the cost of tuition for bachelor’s degree programs.
<b>5. Provides benefits for adult and returning students</b>	Students from low-income families face a number of financial pressures that may require them to delay or interrupt attending college. Limiting eligibility for free college programs to recent high school graduates or first-time college students denies benefits to a large population of students in need of support and greatly limits the ability of such programs to move the needle on overall postsecondary attainment.	Programs do not meet the criteria if they limit eligibility based on age, year of high school graduation, or prior college experience. Programs can, however, meet the criteria if they exclude adults who have already earned a college degree or have completed the number of credits necessary to earn a degree.
COMPONENT	RATIONALE	EXPLANATION/APPLICATION
<b>6. Does not impose GPA requirements beyond what is needed to maintain eligibility for federal financial aid</b>	Institutions are already required to establish minimum GPA requirements that students must meet to demonstrate “satisfactory academic progress” (SAP) and maintain eligibility for federal financial aid. Programs requiring students to maintain a GPA higher than a 2.0 (the general SAP minimum) may shut out the students who stand to benefit the most from free college programs. Such restrictions also add to the complexity and limit the impact of free college programs, and should therefore be reserved for merit-based or other targeted aid programs.	Programs do not meet the criteria if they require recipients to earn a college GPA higher than a 2.0 to stay eligible, except that they may defer to the college’s SAP GPA cutoff if that cutoff is higher than a 2.0 and still meet the criteria. (High school GPA and test score requirements were not considered for the evaluation except to exclude merit-based awards from consideration.)
<b>7. Does not impose enrollment intensity or credit accumulation requirements beyond what is needed to maintain eligibility for federal financial aid</b>	Programs requiring students to maintain more than half-time enrollment or earn a certain number of credits per semester or year may shut out the students who stand to benefit the most from free college programs, including older students and those working while in school. Such restrictions also add to the complexity and limit the impact of free college programs, and should therefore be reserved for merit-based or other targeted aid programs.	Programs do not meet the criteria if they limit eligibility based on the number of hours a student enrolls per semester or the number of credits they earn per semester or year, except that they may apply federal financial aid requirements (i.e., half-time enrollment and credit accumulation sufficient to demonstrate satisfactory academic progress).
<b>8. Does not demand the repayment of aid</b>	States should not place any requirements on free college program beneficiaries related to their residency, employment, or activities after they leave or graduate from college and cease receiving aid. Under no circumstances should grants distributed through free college programs be converted to loans, and states should not impose financial penalties on recipients for failing to maintain eligibility or for moving outside of the state after leaving college. For example, the proposed Wisconsin Promise Program would require recipients to graduate with a 3.0 GPA and be continuously employed in the state for three years after graduation; failure to do so results in the grant converting to a loan that has to be repaid with a 5 percent interest rate. Such requirements could be problematic in states where low-income students and students of color face more challenges in the workforce and may need to move to find a job paying a living wage or take care of family members.	Programs do not meet the criteria if grants ever convert to loans or if aid is ever required to be repaid.