TENNESSEE'S BURDEN: HOW STUDENTS APPLY FOR STATE FINANCIAL AID WITHIN ONE SOUTHERN STATE

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Introduction

State spending on financial aid totaled $11.5 billion for students in public higher education in 2020 (Laderman & Heckert, 2021). These funds support various types of aid programs, often within a single state, including programs that target funds based on financial need, academic merit, enrollment in specific institution types, and other factors. States use aid programs to help achieve goals, such as improving college affordability, increasing educational attainment, meeting workforce needs, and reducing inequities in college enrollment and completion. While research indicates that financial aid improves student outcomes and can reduce economic and racial inequities in enrollment and completion (Monarrez et al., 2021; Nguyen et al., 2019), how state policymakers design and implement aid programs may impact whether particular programs are effective and equitable.

Administrative burdens, or the frictions individuals experience as they navigate the bureaucratic processes required to access public services and programs (Burden et al., 2012; Herd & Moynihan, 2018), are a known component of the financial aid application process (Moynihan et al., 2015; Rosinger et al., 2021). The extent to which federal and state governments impose administrative burdens affects who receives aid given that burdens disproportionately fall on low-income and racially minoritized individuals (Herd & Moynihan, 2018; Ray et al., 2022). As a result, more onerous programs may be less effective in meeting state goals and addressing economic and racial inequities (Gándara et al., 2022).

While much is known about barriers to accessing federal aid, particularly the complexity associated with the Free Application for Federal Student Aid (FAFSA) (Bird & Castleman, 2016; Dynarski & Wiederspan, 2012; Kofoed, 2017), we know less about how students access state aid. Rosinger et al. (2021) examined state free college programs and found that the FAFSA was just one of several requirements. States may also require

program applications, documentation of grades, income, or volunteer activities, a certain high school and/or college GPA, and stringent enrollment requirements (e.g., enrollment immediately after high school or full-time and continuous enrollment). In addition, we know little about whether eligibility restrictions or application processes that contribute to administrative burden change over time.

Finally, states frequently operate several aid programs simultaneously with varying target populations, such as students with financial need, racially minoritized students, students meeting academic thresholds, and students at technical, community, and/or four-year colleges. Prior research indicates that aid programs in the state of Michigan impose different requirements on recipients (Steel et al., 2021), but we have little information regarding whether this is a single state phenomenon or if it happens in other states as well. In addition, we do not know whether and how the level of administrative burden relates to the program's target population.

The theory of the social constructions of target populations can explain how policy design can be used to favor positively constructed and more politically powerful groups over less politically powerful groups (regardless of whether this latter group is positively or negatively constructed) (Ingram et al., 2019; Schneider & Ingram, 1993). As a result, policymakers may design aid programs that target more politically powerful and more-advantaged students, such as students meeting some type of academic threshold or students at four-year colleges, to be less burdensome than those that target less-advantaged students, such as low-income students, racially minoritized students, or students at technical and/or community colleges.

Drawing on theories of administrative burden and the social construction of target populations, this study extends research on financial aid complexity by documenting and examining how the level of administrative burden varies across aid programs within a state, whether the level of administrative burden changes over time, and how the level of administrative burden relates to programs' target population. We focus on Tennessee because it is often seen as an innovator in state higher education policy. Tennessee was an early adopter of performance funding, broad-based merit aid (HOPE Scholarship), free college (Promise), and free college focused on helping adults complete a degree (Reconnect). Many of these state policies have served as a model for other states, and the state's efforts have been recognized nationally by the Obama administration and foundations such as Gates and Lumina (Finney et al., 2017). In this study, we ask:

1. *To what extent do administrative burdens vary across state aid programs in Tennessee?*
2. *To what extent do administrative burdens vary within state aid programs over time in Tennessee?*
3. *How does administrative burden relate to whether the target population of a state aid program in Tennessee is relatively more or less advantaged?*

To answer these questions, we reviewed state legislation and aid websites for 19 Tennessee aid programs from Fiscal Years 2011 to 2021. The resulting dataset documents the presence or absence of 30 program features, drawing on the typology created by Rosinger et al. (2021) to identify features of state aid programs that are likely to contribute to administrative burden. We find that the only aid program explicitly focused on racially minoritized students also imposed the highest level of administrative burden on intended recipients. In other cases, however, programs targeted toward less-advantaged students (technical and community college students) proved less onerous while programs targeted toward relatively more-advantaged students (students meeting specified academic thresholds and programs that include students at four-year colleges) proved more onerous. This study expands our understanding of complexity in state aid and offers insight for state policymakers in designing aid programs that can more equitably and effectively meet state goals.

Conceptual Framework

We rely on a conceptual framework that pairs administrative burden (Herd & Moynihan, 2018) with the theory of the social construction of target populations (Ingram et al., 2019; Schneider & Ingram, 1993) in our study of state aid programs. Administrative burdens occur when an individual's experience navigating bureaucratic procedures exercising their rights or accessing public programs is onerous (Burden et al., 2012). Administrative burdens occur across the public domain, from healthcare (Herd & Moynihan, 2020; Moynihan et al., 2016) and food programs (Hanratty, 2006), to immigration (Heinrich, 2018) and natural disasters (Connolly et al., 2021). Administrative burdens that are embedded in public programs impose learning, compliance, and psychological costs on potential recipients (Moynihan et al., 2015). For instance, learning costs arise as potential financial aid recipients explore their aid options, assess their eligibility for aid, and learn how to apply for aid. Compliance costs arise as potential recipients seek to comply with application requirements and eligibility restrictions associated with aid programs. Finally, potential recipients may face psychological costs and/or stigma associated with being deemed "low income", having to repeatedly document their "low-income" status, or meet other stringent aid requirements (Moynihan et al., 2015; Rosinger et al., 2021).

The learning, compliance, and psychological costs that administrative burdens impose can prevent eligible individuals from receiving public benefits, and they fall disproportionately on racially minoritized and low-income individuals who often have less support navigating complex processes (Herd & Moynihan, 2018). Administrative burdens can contribute to structural racism in administrative practices by ensuring certain outcomes that reproduce racial inequities (Ray et al., 2022). As a result, although financial aid programs have the potential to increase college completion and fulfill workforce demands, administrative burdens may hinder students from applying for or maintaining aid, serving to reinforce inequities in college enrollment and completion. By contrast, reduction in the costs associated with program rules is related to higher take-up rates

(Fox et al., 2022), which can lead to program designs that are more effective at reaching their target populations and that have greater potential to reduce inequities (Gándara et al., 2022; Rosinger et al., 2021).

Given the implications administrative burdens hold for the effectiveness and equity of state financial aid programs, our study aims to document and investigate the extent to which administrative burdens vary across aid programs in a single state (RQ1). Since administrative burdens are constructed by policymakers who design policies and the street-level bureaucrats (SLB), such as aid commissions and high school counselors, who implement policies (Herd & Moynihan, 2018), they may also change as the state's political environment, demographics, and financial aid landscape changes. Therefore, we also investigate the extent to which burdens change over time within aid programs (RQ2).

Since aid programs within a single state are often targeted toward different populations, we couple the concept of administrative burden with the theory of the social constructions of target populations to explore how the process of accessing aid varies depending on the targeted population (RQ3). The theory of social constructions of target populations offers insight into how policies vary in their design depending on the social construction of targeted groups as "deserving" (or not) of aid and the amount of political power the target group wields (Ingram et al., 2019; Schneider & Ingram, 1993). In particular, policymakers may ascribe different benefits and burdens on intended recipients depending on recipients' social construction and political power (Ingram et al., 2019; Schneider & Ingram, 1993).

Administrative burdens may be one part of this: indeed, burdens are constructed by policymakers and can be used to allocate resources to individuals the public perceives as more deserving of aid (Herd & Moynihan, 2018). Following this logic, legislators may design aid programs with social constructions of target populations and their political power in mind, and apply varying levels of administrative burden to each targeted population accordingly. Given that many state aid programs explicitly target low-income or other underserved populations, we must be wary of the ways in which habituated patterns of power and advantage are coded into the application process and reinforce inequities.

Schneider and Ingram (1993) identify four types of target populations with different social constructions (positive vs. negative) and political power (weak vs. strong): advantaged (positively constructed and politically strong), contenders (negatively constructed and politically strong), dependents (positively constructed and politically weak), and deviants (negatively constructed and politically weak). In this study, we focus primarily on two types of target populations: advantaged and dependents. Advantaged groups are positively constructed as "deserving" of aid and wield substantial political power. Prior research has found that support for free college programs is stronger when the public perceives the target population as more deserving of aid, for instance, when students qualify based on high school GPA (Bell, 2020). Merit aid disproportionately benefits children from middle- and upper-income families (Heller & Marin, 2004), groups that also hold more political

power (Leighley & Nagler, 2013). We anticipate that aid programs that are targeted toward more-advantaged students who also tend to wield more political power (i.e., students meeting academic qualifications or aid that can be used by students at four-year universities) will have lower levels of administrative burden.

In contrast, dependent groups have little political power even if they are positively constructed. Policies for dependent groups offer benefits but simultaneously tend to label or stigmatize recipients, require recipients to document their need, or prohibit and/or require certain actions of recipients (Ingram et al., 2019; Schneider & Ingram, 1993). Students from lower-income families or racially minoritized backgrounds may be positively constructed if a policy goal is to promote economic and racial equity.

However, prior research indicates that the public views aid programs as less fair when a target population, such as lower-income students, wields less political power (Bell, 2020). As a result, programs that are targeted toward less politically powerful students, such as lower-income and racially minoritized students or students at technical and community colleges that disproportionately serve students from underserved backgrounds (Bailey et al., 2015), may be designed in ways that make aid more difficult to access by requiring eligibility documentation and restricting or requiring certain types of action. We hypothesize that programs that target less-advantaged and less politically powerful populations (i.e., lower-income, racially minoritized, technical or community college students) will have higher levels of administrative burdens relative to other programs.

Literature Review

State spending on financial aid is associated with increased enrollment and completion (Monarrez et al., 2021; Nguyen et al., 2019). Yet, despite increases in state spending on aid (Laderman & Kunkle, 2022), college enrollment and completion has not expanded at the same rate for low-income and racially minoritized students (Bailey & Dynarski, 2011; Baker et al., 2018). Prior research has considered various factors that contribute to economic and racial disparities in college enrollment and completion, including non-financial factors, such as how a complex college-going process contributes to inequitable outcomes (see Dynarski et al. (2022)).

Much of the work on complexity in the college-going process concentrates on applying for federal student aid (Dynarski & Wiederspan, 2012). The FAFSA, which is required for federal student aid, is a long and complex form (Dynarski & Scott-Clayton, 2006), and each year, many potentially eligible students do not apply because they are not aware of federal aid or how to apply for it or report that the form is too complex (Rosinger & Ford, 2019). In addition, after enrolling in college, many students do not re-file FAFSA, which is required to continue receiving federal aid (Bird & Castleman, 2016). State aid programs frequently require students to complete the FAFSA but also often place additional eligibility restrictions and application requirements on potential recipients. State aid programs may require students to submit program applications (sometimes in addition

to FAFSA), submit documentation to verify financial need, academic merit, or other criteria, meet deadlines to apply for aid, sign pledges or promissory notes, meet citizenship and residency requirements, perform volunteer service, and/or meet other program requirements or restrictions (Rosinger et al., 2021).

Complexity in federal and state financial aid program design has material consequences for students. Annually, eligible college students do not receive an estimated $24 billion in grants and loans for which they are eligible (Kofoed, 2017). Even for students who previously received aid, many do not re-file the FAFSA and therefore do not receive federal aid (Bird & Castleman, 2016). Similar patterns emerge in state aid programs. For instance, the initial take-up rate for New York's free college program is estimated at 25 percent of potentially eligible students, and only around half of recipients maintained the scholarship in their second year (Scott-Clayton et al., 2022). Research has found that reducing barriers to FAFSA completion—such as providing assistance with the application and sending personalized reminders about FAFSA (Bettinger et al., 2012; Castleman & Page, 2015, 2016)—can improve college enrollment and completion.

Recent work has begun to investigate administrative burdens in state aid programs, often focusing on street-level bureaucrats (SLB), such as high school counselors, who help implement state aid programs and can help to either mediate or exacerbate administrative burdens that students face (Lipsky, 1980). Bell and colleagues (2020) surveyed SLB who helped implement Oklahoma's Promise aid program and found that conservative SLB were more supportive of administrative burden, often justifying burdens as a way to reduce fraud and abuse and for students to demonstrate that they have earned or deserve aid. In contrast, liberal SLBs were less supportive of burdens and were more likely to view them as barriers that undermine social equity goals (Bell et al., 2020). The support and perceptions SLB have for administrative burden are particularly important given subsequent research showing that high school counselors have discretionary power to either increase or decrease the burden students face in accessing the program (Bell & Smith, 2022). Billings and colleagues (2022) found that high school counselors themselves face administrative burdens in understanding the financial aid process and helping students apply and frequently turn to other counselors in their networks for assistance.

While prior literature offers insight into how SLB experience, perceive, and help students navigate administrative burdens in state aid programs, we know relatively little about the student experience of applying for aid at the state level, particularly the extent to which students encounter administrative burden in accessing aid. A study by Rosinger and colleagues (2021) sought to quantify the level of administrative burden students face in accessing statewide free college programs by documenting the process of applying for and maintaining free college aid across states. They found that free college programs varied substantially across states in the administrative burden imposed on students.

The present study applies Rosinger et al.'s framework of measuring administrative burden on a broader set of state aid programs. Free college programs, the primary focus of literature on administrative burden in state aid (e.g., Bell et al., 2020; Bell & Smith, 2022; Rosinger et al., 2021), represent a growing but small amount of state funding for aid (Mishory & Granville, 2019). States frequently operate multiple aid programs targeted toward different groups of students (National Association of State Student Grant and Aid Programs (NASSGAP), 2020), and these programs can impose different requirements for initial and continued receipt (Steel et al., 2021). However, we know relatively little about the administrative burden associated with applying for state aid, how it varies across aid programs within a state, and about how the level of administrative burden relates to a program's targeted population, which this study examines using the state of Tennessee as a case site.

Data and Methods

State Selection and Context

We chose to focus on the state of Tennessee since it has served as a frequent model for other state aid programs, including broad-based merit aid and free college programs. In 2019-2020, Tennessee provided $480 million in financial aid, the eighth-highest amount in the country (NASSGAP, 2020a). Just under 60 percent of these funds were awarded through merit-based aid programs, around 20 percent through need-based aid programs, 5 percent through a combination of need- and merit-based programs, and the remainder through special purpose funds (such as a two teaching fellows programs, which include academic criteria) (NASSGAP, 2020b). The state funds 28 aid programs through general fund or lottery revenues (authors' review of state documents). This study focuses on 19 programs available to college students across the state.[1] We excluded nine aid programs that were either not grant programs or were narrowly focused on a small group of students (e.g., dependent children of public servants). Table 1 includes information about each program and Appendix A offers detailed descriptions of each program and its requirements (Appendix B lists programs excluded from our study).

See Table 1. Key features of state financial aid programs in Tennessee

Tennessee's funding of financial aid goes back nearly 50 years, with the introduction in 1976 of the Tennessee Student Assistance Award (TSAA) for students with financial need, which remains the state's primary need-based aid program today. In the 2000s, the state expanded its aid programs, particularly with the introduction of the Tennessee Education Lottery Scholarship (TELS) program in 2004. TELS-funded programs are intended to improve high school academic achievement, promote college access, retain the "best and brightest" students, and promote economic and community development (THEC, 2021). Five TELS-funded programs are included in the suite of HOPE programs, the state's broad-based merit aid program.

In 2013, Governor Bill Haslam launched *Drive to 55*, a statewide college completion initiative aimed at helping the state meet workforce development needs and boost economic development (Tennessee Department of Education, n.d.). The suite of universal aid programs growing out of *Drive to 55* (Promise, Reconnect, TCAT Reconnect) provide tuition-free community and technical college for eligible students and are aimed at helping students complete a community or technical college credential. Loan forgiveness programs tied to specific workforce sectors are another component of Tennessee's aid system. The programs function as grant aid to be forgiven unless the service obligation goes unfulfilled. The state also operates other, often smaller programs, such as the merit-based Ned McWherter Scholars program and the STEP UP program, which provides aid to high school graduates with intellectual disabilities.

Data Collection

We collected data on the eligibility requirements and application process for 19 Tennessee aid programs from 2011 to 2021 by reviewing state administrative code, student aid commission documentation, and program websites, using the Internet Archive Wayback Machine and Thomson Reuters Westlaw database to locate information tied to the Tennessee Higher Education Commission (THEC) and Tennessee Student Assistance Corporation (TSAC). We drew on both administrative code and THEC and TSAC documents to learn about the process of applying for aid under each program because the state legislature established the programs in administrative code, and TSAC (which is part of THEC) administers aid programs. Drawing on both sets of documentation allowed us to capture information regarding requirements that legislators put into place when designing programs (which often determined eligibility restrictions, such as need or merit thresholds, residency and citizenship requirements, and eligible institutions) as well as requirements that TSAC put into place when implementing programs (which often outlined application logistics, such as deadlines, forms, and other requirements). Both sets of documentation helped us understand the complete set of eligibility requirements, application logistics, documentation, and enrollment logistics for each program.

For each program, we collected data on 30 program features, drawing on the administrative burden framework from Rosinger et al. (2021) that identified features of aid programs that are likely to impose administrative burdens when students initially apply for aid (e.g., deadlines, need requirements, academic thresholds, additional aid or program applications, documentation to verify grades and/or income, enrollment after high school, or full-time enrollment). To the list of program features developed by Rosinger and colleagues (2021), we iteratively added features that were specific to some Tennessee programs as we began our coding process, such as essay or recommendation requirements and whether a program had a priority deadline or awarded aid on a first-come, first-served basis. In doing so, our data collection sought to capture the learning and compliance costs associated with applying for each aid program by documenting the process of assessing eligibility and how to apply (learning costs) and complying with various program requirements (compliance costs).

Most of the program features we coded for likely impose both learning and compliance costs. For example, the eligibility restrictions listed in Table 2, such as residency, citizenship, or academic requirements, impose learning costs as students learn about the program and assess their eligibility and compliance costs associated with satisfying these requirements. Many features could also impose psychological costs, such as stress associated with complying with program requirements or meeting certain requirements. Table 2 lists the complete list of data elements we collected for each program. In our dataset, we coded 1 for the presence of a particular program feature, or burden, and 0 for its absence. Together, the 30 data elements represent a comprehensive list of the eligibility restrictions, application logistics, documentation, and enrollment requirements students need to meet in order to receive aid under each program.

See Table 2. Data elements used to construct administrative burden index

We also collected information regarding the target population(s) of each program to examine whether the social constructions of the targeted population related to different levels of administrative burdens. To do this, we examined the eligibility restrictions to understand whether each program was targeted toward a relatively advantaged and politically powerful group identified earlier (i.e., students meeting a specified academic threshold, students at four-year colleges) or a relatively less advantaged and less politically powerful group (e.g., students with financial need, racially minoritized students, technical or community college students).

For each program, we coded variables indicating the target population as 1 if the program focused on that particular group (e.g., students with financial need) and 0 otherwise. We also collected data on the average aid award for each program in its most recent year (adjusted to 2020 dollars) since states might apply different levels of burden for larger versus smaller awards. In our analytic models, we adjust for average award amount to explore the relationship between administrative burden and a program's targeted population, independent of how large the award is. We gathered this data from the NASSGAP annual survey (https://www.nassgapsurvey.com) from the year the program most recently operated. Data for Reconnect came from the program's annual report since it was not recorded in NASSGAP.

We began data collection with one research team member coding for the presence or absence of each design feature for all programs. After this initial data collection, a second team member reviewed the coding and policy documents to determine whether the initial coder and the other team member agreed on the interpretation of policy documents and coding decisions. If there were discrepancies after the second review, both team members reviewed documents again to come to a final consensus. During data collection, members of the research team regularly discussed coding to ensure consistency. State officials at THEC also provided information that we were unable to locate through administrative code and program websites. In a very small number of instances, we were unable to find or verify documentation of a particular feature in a given year,

and we used information from the two surrounding years to fill in missing data if requirements were the same in the years for which we had data.

Data Analysis

We used the 30 data elements we collected for each program to create an administrative burden index (ABI) that equaled the number of program features that existed in a given program in a given year, following the Rosinger et al. (2021) construction of an ABI for free college programs. This index is a measure of the level of administrative burdens a program imposes (or the number of tasks a student must complete and requirements they must meet to access aid), with a higher index value indicating more administrative burden (or more tasks and requirements). We used the ABI to answer the first two research questions, descriptively examining variation in ABI across programs in their most recent year (RQ1) and variation in ABI within programs over time (RQ2). We also examined which program features that likely contribute to administrative burdens were more and less common across aid programs over time.

To examine how the level of administrative burden in aid programs related to their target population (RQ3), we coded programs based on features of their targeted populations. We created four binary variables indicating whether an aid program targeted relatively less-advantaged students. These included 1) students with financial need, 2) racially minoritized students, 3) only students at technical and community colleges, and 4) students at technical and community colleges (could also be used at four-year universities). We also created three binary variables indicating whether a program targeted relatively more-advantaged students. These included 1) students meeting academic thresholds, 2) only students at four-year universities, and 3) students at four-year universities (could also be used at technical or community colleges).

To investigate whether aid programs imposed different levels of administrative burden depending on characteristics of targeted populations, we estimated a separate random effects regression model for each binary indicator to predict the ABI. The equation can be expressed:

$$Y_{it} = \alpha + \beta_1 \, TARGETPOP_{it} + \beta_2 \, AVGAWARD_i + T_t + (u_i + v_{it})$$

where Y_{it} is the ABI for a given program in a given year; $TARGETPOP_{it}$ is the binary variable indicating whether a program targeted a given population in a given year; $AVGAWARD_i$ is the average aid award for the program in its most recent year; T_t are year fixed effects; and $u_i + v_{it}$ is the composite error term. We used random effects because the independent variable of interest (targeted population) does not vary over time (i.e., programs focused on technical and community college students maintain that focus over time).

While the current study uses a blunt measure to indicate the presence of administrative burden (indicating whether a specific burden is present or not), we recognize some program features may be more onerous than others because they require a more sustained effort (e.g., enrolling in college full-time or maintaining

continuous enrollment may impose a larger burden on students than completing FAFSA). We conducted a sensitivity check in which we weighted program features that require a more sustained effort as twice as burdensome than features that required less sustained effort (e.g., discrete tasks that could be completed in a couple of days, such as submitting FAFSA or standardized test scores). We then used this weighted index to examine variation in administrative burden across programs and in relation to targeted populations. Results were similar to those presented and are shown in Appendix C and D.

Findings

Figure 1 shows the ABI for each of the 19 Tennessee aid programs we examined. ABIs are shown for the most recent year, which was 2021 for all except three programs that ended operation prior to 2021.[2] The average program in its most recent year of operation had an ABI of 11.9 with a range of 8 to 17. The ABI can be interpreted as the number of eligibility restrictions and application procedures a student must meet to receive an initial aid award and can be examined alongside the average ABI across programs to investigate whether a program is relatively more (or less) burdensome than the average aid program in Tennessee. The TSAA, which is directed to students with financial need (ABI: 8), the Community College Reconnect Grant (ABI: 9) and Wilder-Naifeh Technical Skills Grant (ABI: 9), which are targeted toward students at community and technical colleges, respectively, have relatively low levels of administrative burden relative to other programs. By contrast, the Teaching Scholars program (ABI:16) and Minority Teaching Fellows program (ABI: 17)—the only program that explicitly directs funds to racially minoritized students—had the highest levels of administrative burden.

Figure 1. Administrative burden index for state aid programs in Tennessee in 2021
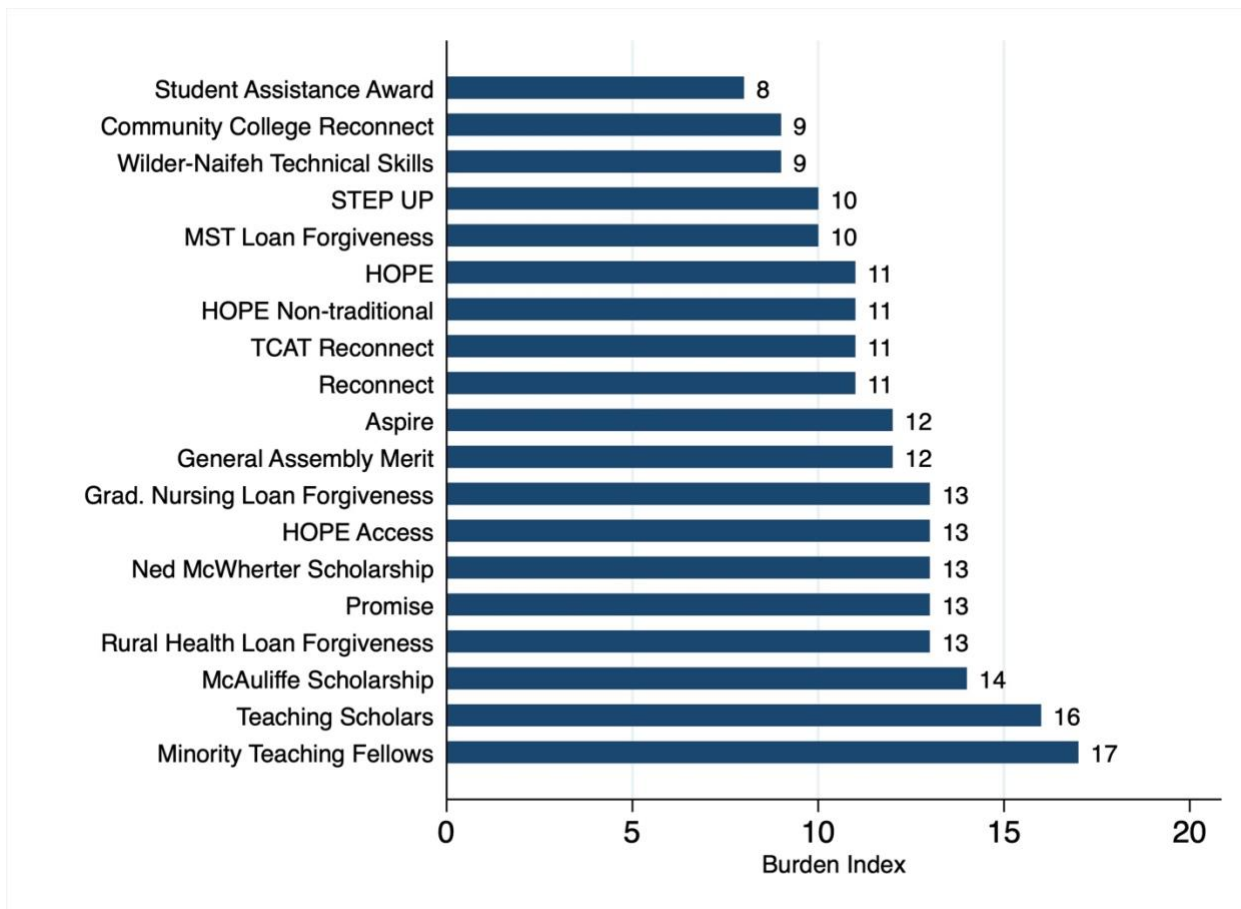

Notes. For programs that were discontinued prior to 2021, we used the most recent year the program was active. These programs were Community College Reconnect (2018), Rural Health Loan Forgiveness (2013), and the McAuliffe Scholarship (2020).

Interestingly, programs grouped together across a larger suite of programs (e.g., the suite of HOPE programs, encompassing HOPE, HOPE Access, HOPE Non-Traditional, Aspire, and the General Assembly Merit Scholarship) varied in administrative burdens. HOPE programs, which provide aid based on academic merit or a combination of need and merit, had ABIs ranging from 11 for its first-year and non-traditional aid programs to 13 for HOPE Access, which is targeted toward first-year students with financial need and academic merit. In contrast to other HOPE programs, HOPE Access requires recipients to meet two academic thresholds (high school GPA and test score). The state's free college programs targeted toward adult students, TCAT Reconnect and Reconnect, had ABIs of 11, while Promise, which focuses on students enrolling in college shortly after high school graduation, had an ABI of 13.

Figure 2 shows the ABI for each of the 19 programs during the years they operated from 2011 to 2021. We find that programs' level of administrative burden varied little over time: just two programs altered the application process and/or eligibility criteria in ways that likely made them more difficult to access. TCAT Reconnect and Wilder-Naifeh Technical Skills Grant both added a deadline and began to encourage students to apply early during the period we observed. With these two exceptions, ABI remained stable within programs over time.

Figure 2. Administrative burdens in state aid programs in Tennessee, 2011-2021
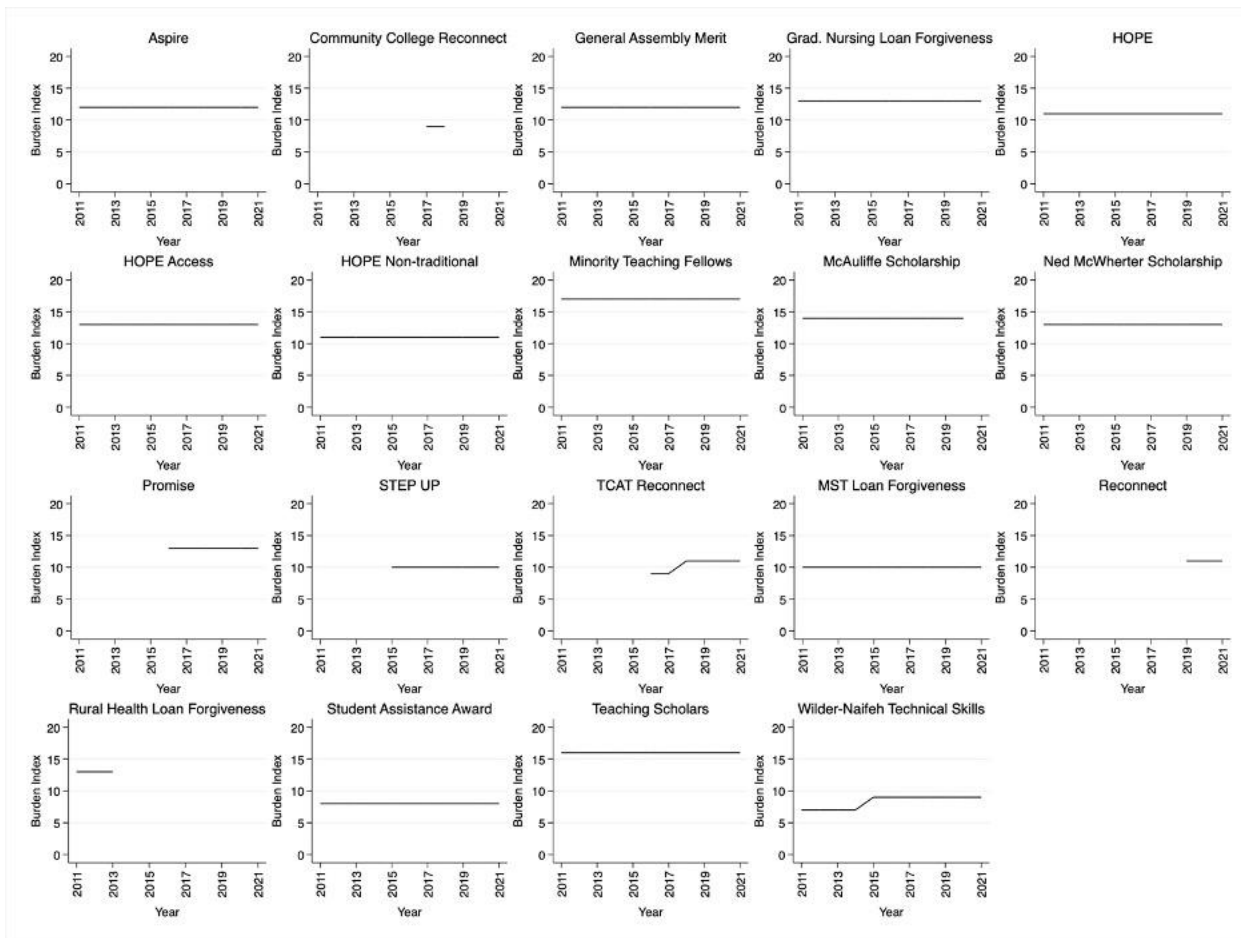
We also examined which features were most and least common across programs over time. Figure 3 is a heat map showing the share of programs with each administrative burden in a given year. Several requirements or burdens showed up across all programs each year they operated (shown in dark purple): recipients were required to be residents of Tennessee, U.S. citizens or eligible non-citizens, and not incarcerated. Other common aid requirements, represented by darker blue and purple cells (present in more than 60% of programs), included continuous college enrollment, academic thresholds, deadlines, awarding aid on a first-come, first-served basis or otherwise encouraging an early application, restricting the institutions where funds

could be used (usually for-profit institutions), and not having defaulted on educational loans. None of the programs required a drug test, criminal history reporting beyond that required for federal aid, confirmation of a code of conduct, specific high school curriculum, or campus-specific processes (shown by the yellow cells). Few programs required essays and/or recommendations (both of which were required for the Minority Teaching Fellows), volunteer requirements (Promise), or listed a priority deadline (TSAA) (shown in light green).

Figure 3. Heat map of administrative burdens in state aid programs in Tennessee, 2011-2021
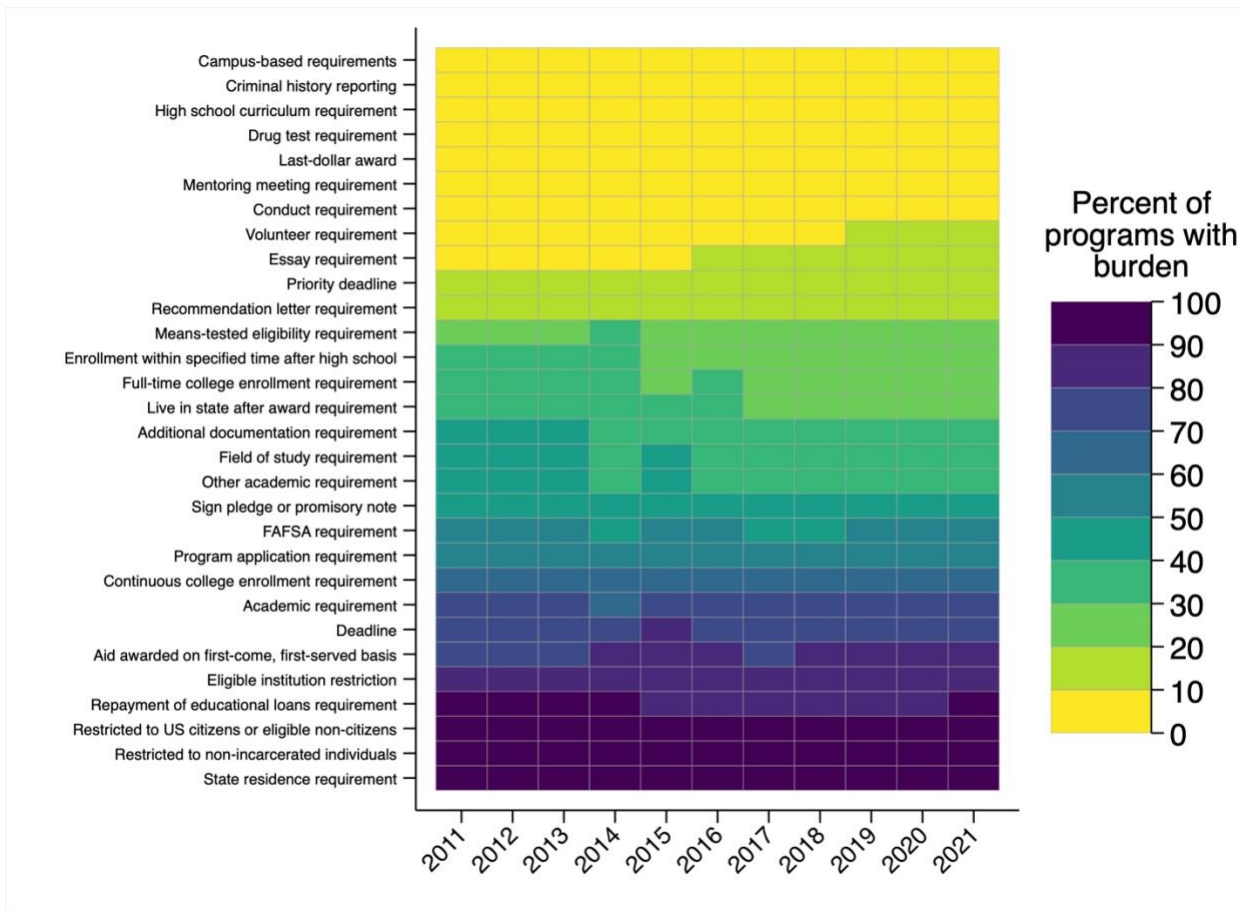

Table 3 shows results from the series of random effects regression using indicators of targeted populations to predict ABI. We found that the ABI for programs targeted toward students with financial need was not statistically different from non-need-based aid programs. That is, aid targeted toward students with financial need was not more (or less) onerous on average than programs that did not explicitly focus on financial need. The Minority Teaching Fellows program had a significantly higher ABI than programs that did not focus on racially minoritized students (by around 5 index points). Programs explicitly targeted toward students at technical and community colleges had statistically significantly lower ABI than other programs (by around 3

index points) while programs that were available but not exclusive to technical and community college students did not have a statistically significant difference in ABI than other programs. We found that programs targeted toward relatively more-advantaged students—students who met certain academic thresholds or that included students at four-year universities—were around 3 index points more burdensome, on average, than other programs.

See Table 3. Random effects regression results

Discussion

This study contributes to research examining administrative burdens in state aid programs (e.g., Bell et al., 2020; Bell & Smith, 2022; Rosinger et al., 2021; Steel et al., 2021) by considering how administrative burdens vary across programs within a state and how the targeted populations of programs relate to administrative burdens. We find administrative burdens vary across programs in Tennessee but change little over time, showing the importance of policymaker and aid commission decisions in designing and implementing programs. We find that programs directed toward technical and community college students, who disproportionately come from racially and economically underserved backgrounds (Bailey et al., 2015), are associated with lower levels of administrative burden. In contrast, aid targeted toward more-advantaged students—students meeting specified academic thresholds or programs that can also be used by students at four-year colleges—are associated with higher levels of administrative burden.

These findings contrast with our hypotheses that programs targeting more-advantaged students would have fewer features that contribute to administrative burden than programs targeted toward less-advantaged students. Our hypotheses aligned with the idea that policy design reflects the social constructions of target populations—the extent to which populations are positively or negatively constructed and therefore deserving of aid or not and the extent to which they wield political power (Schneider & Ingram, 1993). So what could explain these contrasting results? One possible explanation is that aid programs targeted toward technical and community college students, which we hypothesized would be disadvantaged in the design of aid policies since they tend to wield little political power, have close linkages to state workforce development goals and college completion initiatives.

State policymakers may therefore design these programs to be easier to access in an effort to increase college enrollment and make progress on college completion goals, such as Tennessee's *Drive to 55* initiative. After all, policymakers construct administrative burdens and can choose to reduce burdens in programs they support (Herd & Moynihan, 2018), such as ones that are closely linked with state goals. Further, the importance of technical and community college students in attaining state goals may mean these groups are more positively constructed in policymakers' and the publics' perception, which is then reflected in policy design through lower levels of administrative burden.

Our findings, however, do not directly contradict the idea that policymakers may impose higher levels of administrative burden in programs that target less-advantaged or less politically powerful students. In particular, the Minority Teaching Fellows program (the only program explicitly focused on racially minoritized students) imposed the highest level of administrative burden on students. While the Minority Teaching Fellows and the Teaching Scholars Program both had relatively high burden, the first includes additional requirements that applicants of the latter program do not have to provide (applicants to both programs must submit a letter of recommendation, but Minority Teaching Fellow applicants must submit a second reference and an essay). More broadly, it is important to also note the contrast in burdens between the teaching-focused programs (highest levels of burden), where workforce needs are high, and programs enacted under the *Drive to 55* initiative (lower levels of burden) that are aligned explicitly toward workforce needs.

In contrast to our expectations, programs targeted toward relatively advantaged, positively constructed, and more politically powerful groups—students who meet certain academic thresholds and students attending four-year colleges—were found to encounter higher levels of burden. The higher levels of administrative burdens associated with merit aid and aid that can be used at four-year colleges may reproduce inequities by posing one more barrier to high-achieving, underserved students enrolling in a four-year and more selective institution. Thus, we find that administrative burdens may still serve as a mechanism through which policymakers allocate resources—in this case, in the form of merit aid and aid that can be used across sectors—to more-advantaged populations (Ingram et al., 2019).

Importantly, entire groups of disadvantaged students are excluded from state financial aid in Tennessee: people who are currently incarcerated and undocumented students are not eligible for state aid programs in the state. These groups are often negatively constructed as undeserving of public programs and wield virtually no political power (Ingram et al., 2019). Schneider and Ingram (1993) note that policymakers may enact more coercive policies or sanctions toward groups that are negatively constructed and have little political power. While Tennessee has seen increasing levels of access to federal financial aid dollars for incarcerated students under the Second Chance Pell Program (Chesnut et al., 2022; Oakford et al., 2019), no such gains have been made for similar students seeking to access state-level aid. In Tennessee (and many other states (Custer & Akaeze, 2021)), state policymakers make state aid inaccessible to these students.

Contribution to Research and Future Research Directions

Complexity in federal financial aid deters some eligible students from receiving aid (Dynarski & Wiederspan, 2012). In response, researchers and organizations have developed individual-based interventions to help students navigate this complexity (e.g., Castleman & Page, 2016). Rather than nudging students to complete a complex process, other efforts have focused on systems, considering how aid programs themselves could be designed to reduce burdens, increase take-up, and promote more equitable outcomes. In recent years, policy

efforts have resulted in several changes to simplify the federal aid process: a shortened FAFSA, an adjusted timeline that allows students to apply earlier using prior year tax returns, and linking tax returns directly to FAFSA (Dynarski & Wiederspan, 2012). Our study contributes to literature on financial aid complexity by demonstrating additional burdens policymakers place on students seeking state aid. It also contributes to our understanding of how financial aid programs can reinforce (or interrupt) racial and economic inequities in college enrollment and completion.

While our findings offer important insights into administrative burden in state aid and how it relates to the social constructions of target populations, future research should allow for a more nuanced conceptualization of who is advantaged and who is not. Our study uses a blunt measure of "advantage" or "deservingness" by considering programs' focus on financial need, academic merit, and institutional sector (though we would argue that policy actors frequently do the same in determining how to target aid). However, further exploration and refinement of "advantage" and "deservingness" (or lack thereof) is warranted since other states may ascribe different meanings to these concepts and therefore enact different levels of burdens during policy design. Future research can explore state policy documents to explore how deservingness is constructed for different groups of students at the state or more local level. For instance, if scholars find that West Virginia constructs different groups as deserving of state financial aid from Tennessee, this could help explain why it requires students who wish to use its free community college program to pass a drug test while Tennessee does not (Hazelrigg, 2019).

Our study is also limited by the inherent challenges of trying to quantify administrative burden since individual features of aid programs may impose different levels of administrative burden. Our sensitivity check along with prior research (Rosinger et al., 2021) has attempted to account for this by weighting program features that require longer-term efforts, such as maintaining a certain GPA, more than features that can be completed fairly quickly, such as signing a form. However, burdens affect individuals and groups in different ways. What may seem like a relatively small burden—signing a promissory note for loan forgiveness—can have psychological costs that are greater for some individuals and groups than others. As a result, attempts to adjust weights attached to different program features may ignore their disproportionate effects on some intended recipients. While our findings were robust to models where we attached greater weight to program features that are likely to require more sustained effort, there are larger distinctions in burden across program features than a simple index can capture. Future research might investigate how individuals and groups navigate various burdens. Such work would identify specific burdens that are particularly onerous and offer insight into features policymakers could alter to design more equitable programs.

Finally, we focus on documenting the existence of and variation in administrative burdens within a single state over time. The evolution of aid programs in Tennessee follows broader national trends across states with an

initial focus on need-based aid, the creation of a merit aid program, and the recent adoption of free college and other programs aimed at improving college completion and meeting workforce needs (Doyle, 2008; Mishory & Granville, 2019). The state has also served as a model for other state and federal aid programs (Finney et al., 2017). As such, it serves as an important case site in which to investigate administrative burdens that students face in accessing the state's aid programs. However, results may not be generalizable to other states. States differ dramatically in the extent to which they offer financial aid and what types of programs they offer (NASSGAP, 2019; Rosinger et al., 2022). Future research might consider the extent to which these findings hold across other state contexts in order to offer more information to policymakers regarding a full range of program designs.

Subsequent research might also consider the impact of administrative burden across states on college enrollment and completion, particularly among low-income and racially minoritized students. Research might also investigate how the presence (or absence) of specific burdens shapes outcomes to understand which burdens are more or less inequitable. Such research would offer insights into the consequences of administrative burden.

Implications for Policy

Administrative burdens are the result of choices politicians and state officials make regarding policy design and implementation, and these choices have implications for whether and which individuals are able to access aid (Herd & Moynihan, 2018). In particular, administrative burdens can be racialized and serve to reproduce wider social inequities (Ray et al., 2022). But policymakers and state aid officials can make alternative choices, and this study offers several implications regarding the design and implementation of state aid programs. First, given the amount of variation that exists in administrative burden across programs in a single state, we recommend that state higher education officers and state policymakers conduct an audit of the eligibility requirements and application process for each program to understand if, where, and why differences in administrative burdens exist. They may then identify some uncommon burdens (for example, the recommendation letters and essay required for Tennessee's Minority Teaching Fellows program) and examine the costs and benefits of these particular design features. In addition, state policymakers should consider the benefits versus potential costs of any administrative burdens beyond those already imposed by FAFSA (which itself is a barrier).

Second, since many administrative burdens are written into state code and change little over time, as states introduce new programs or revise existing ones, they should carefully consider how additional requirements or complex application processes are likely to shape the outcomes of programs. In the coming years, changes to the federal aid application process may prompt state legislators and aid commissions to revise eligibility restrictions and program requirements to align with federal policy. These upcoming changes include revisions

in how financial need is calculated and eligibility restrictions (e.g., removal of requirement for male students to register with the Selective Service and expanding eligibility to incarcerated individuals and individuals with drug convictions) (Federal Student Aid, 2021). This offers a policy window for state policymakers and aid commissions to revisit program requirements. Tennessee and other states have already shown an interest in streamlining aid processes, posing another impetus for adjusting requirements to reduce administrative burdens.

Finally, state policymakers may look at programs with closer linkages to workforce training, which our findings indicate tend to have lower burdens, in designing other programs. If policymakers continue to create more burdensome requirements for merit aid or programs that can be used across sectors, they may reproduce inequities in access to the four-year sector.

Our study extends prior literature on federal aid complexity by documenting complexity that exists in state aid programs in Tennessee, a state that has served as a model for many other state aid programs, and how this complexity relates to the target populations of these aid programs. Our findings highlight the need for policymakers to consider financial aid simplification at not only the federal level but at the state level as well.

[1] These included two tuition assistance benefit programs, one federal loan forgiveness program, three programs focused on narrowly defined student populations (veterans, foster children, dependent children of public servants), two programs that provide aid to high school students, and one state-administered federal program (see Appendix B for a list of excluded programs).

[2] We used 2013 data for the Rural Health Loan Forgiveness program, 2018 data for the Community College Reconnect program, and 2020 data for the McAuliffe program since that was the last year each program operated.

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Table 1. Key features of state financial aid programs in Tennessee

Program	Sector	Target population	Average award amount[a]	Need or academic requirement	Need threshold	Academic requirement	First-come, first-served[b]	Last dollar[c]	Additional documents	Deadline
Tennessee HOPE	Public 4-year Public 2-year Private	First-year students enrolling within 16 months of HS graduation	$3,602	Merit	N/A	21 ACT or 3.0 GPA	Yes	No	Yes	Sept. 1
Tennessee HOPE Access	Public 4-year Public 2-year Private	First-year students enrolling within 16 months of HS graduation	$1,751	Both	$36,000	2.75-2.99 GPA and 18-20 ACT	Yes	No	Yes	Sept. 1
Tennessee HOPE Non-Traditional	Public 4-year Public 2-year Private	Students 25 and older who have not been enrolled for >2 years	$3,345	Both	$36,000	2.75 GPA after 12 attempted hours	Yes	No	No	Sept. 1
Aspire Award	Public 4-year Public 2-year Private	First-year students enrolling within 16 months of HS graduation	$1,101	Both	$36,000	21 ACT or 3.0 GPA	Yes	No	Yes	Sept. 1
General Assembly Merit Scholarship	Public 4-year Public 2-year Private	First-year students enrolling within 16 months of HS graduation	$898	Merit	N/A	3.75 GPA and 29 ACT	Yes	No	Yes	Sept. 1
Tennessee Promise	Public 4-year Public 2-year Private TCAT	First-year students enrolling within 16 months of HS graduation	$2,011	Need	N/A	N/A	No	Yes	No	Promise: Nov. 1 FAFSA: Feb. 1
Tennessee Reconnect	Public 4-year Public 2-year Private TCAT	Independent adult students who have not earned a degree	$2,420	N/A	N/A	N/A	No	Yes	Yes	Sept. 1
TCAT Reconnect	TCAT	Adult students at a TCAT	$1,135	N/A	N/A	N/A	No	Yes	No	July 1
Community College Reconnect Grant [d]	Public 2-year	Adults returning to complete associate degree	$1,863	N/A	N/A	N/A	Yes	Yes	No	N/A

Program	Institution Type	Eligibility	Amount	Type	Max	Requirements				Deadline
Tennessee Student Assistance Award	Public 4-year Public 2-Year Private Proprietary TCAT	Students with financial need	$1,386	Need	$2,100	N/A	Yes	No	No	Feb. 1
Ned McWherter Scholars	Public 4-year Public 2-year	High school graduates	$2,912	Merit	N/A	3.5 GPA and 29 ACT	Yes	No	Yes	Feb. 15
Tennessee STEP UP	Public 4-year Private	High school graduates with intellectual disabilities	$3,765	N/A	N/A	N/A	No	No	Yes	Sept. 1
Wilder-Naifeh Technical Skills Grant	TCAT	Students at a TCAT	$1,275	N/A	N/A	N/A	No	No	No	Nov. 1
McAuliffe Scholarship[e]	Public 4-year Public 2-year Private Proprietary TCAT	Students in 3rd year of approved teacher education program	$567	Merit	N/A	3.5 GPA and ACT score >national average	Yes	No	Yes	N/A
Minority Teaching Fellows	Public 4-year Public 2-year	Racially minoritized students in approved teacher education program in the state	$4,826	Merit	N/A	2.75 GPA and 18 ACT, or top 25% of HS graduating class	Yes	No	Yes	April 15
Tennessee Teaching Scholars	Public 4-year Public 2-year	Students admitted to approved teacher education program in the state	$3,314	Merit	N/A	2.75 GPA	Yes	No	Yes	April 15
Graduate Nursing Loan-Forgiveness	Public 4-year Public 2-year Private	Registered nurses seeking to become teachers and administrators in Tennessee nursing education programs	$5,456	N/A	N/A	N/A	Yes	No	Yes	March 1
Tennessee Math & Science Teacher Loan Forgiveness	Public 4-year Public 2-year Private	Public school teachers seeking advanced degree or certification in math or science in the state	$2,000	N/A	N/A	N/A	No	No	No	Sept. 1
Tennessee Rural Health Loan Forgiveness[f]	Public 4-year Public 2-year Private	Health care providers and dentists in the state	$10,695	N/A	N/A	GPA and program test scores	No	No	Yes	Sept. 1

Notes. Data comes from fiscal year 2021 unless indicated otherwise. Unless otherwise noted, academic requirement is for incoming first-year students.

[a] Data on average aid award come from NASSGAP for the most recent year the program operated (adjusted to 2020 dollars) or from state financial aid annual reports if a program was not reported to NASSGAP.

[b] First-come, first-served indicates that aid is awarded on first-come, first-served basis and is coded as 1 if documents indicated thereias a priority deadline, that the program might run out of money, or otherwise encourages students to apply early.

[c] Last dollar indicates that program aid is awarded after any other grant aid funds a student receives are applied to tuition and fees. Unless documents explicitly noted that a program operated as a last-dollar program, we coded the program as first dollar.

[d] Ceased operation in summer 2018

[e] Ceased operation in summer 2020

[f] Operated in academic years 2008-2013

Table 2. Data elements used to construct administrative burden index

Type of burden	Variable	Definition
Program eligibility restrictions	Institution restriction	1 if program stipulates funds cannot be used in specific institutional sectors; 0 otherwise
	Incarcerated student restriction	1 if program restricts incarcerated students from receiving program funds; 0 otherwise
	Undocumented student restriction	1 if program restricts undocumented students from receiving program funds; 0 otherwise
	Residency restriction	1 if program stipulates an in-state residency requirement; 0 otherwise
	FAFSA	1 if state aid application requires FAFSA submission; 0 otherwise
	Need restriction	1 if there an income, EFC, or other means-tested requirement; 0 otherwise
	Enrollment within specified time after HS graduation	1 if program requires college enrollment in specified time period after high school graduation (e.g., immediately, 1 year, 2 years, 3 years); 0 otherwise
	HS curriculum requirement	1 if program requires student to complete a certain number of high school credits or specified curriculum in high school to receive award; 0 otherwise
	Academic requirement	1 if program stipulates high school or college GPA, test scores, or other academic requirement above SAP; 0 otherwise
	Additional academic requirement	1 if program stipulates an additional academic requirement (test score, etc.); 0 otherwise
Application logistics	Essay(s)	1 if program requires a personal essay as part of application materials; 0 otherwise
	Recommendation(s)	1 if program requires recommendation letters on behalf of student; 0 otherwise
	Deadline	1 if state-specific deadline to apply for aid; 0 otherwise
	Priority deadline	1 if state-specific priority deadline to apply for aid; 0 otherwise
	First-come, first-served	1 if aid is awarded on first-come first-served basis (code as yes if state uses language like: priority deadline, we might run out of money, so apply early or otherwise encourages students to apply early); 0 otherwise
	Last dollar	1 if aid is awarded on a last-dollar basis; 0 otherwise
	Form required	1 if state financial aid or program application required (beyond FAFSA); 0 otherwise
Additional documentation	Additional requirements or documentation	1 if aid application includes additional requirements or documentation; 0 otherwise
	Pledge or promisory note requirement	1 if program requires high school students to sign a pledge or enroll in program before 12th grade; 0 otherwise
	Live in state after award requirement	1 if program requires students to live in state for specified period of time after receiving award and/or after completing degree/certificate; 0 otherwise

	Loan repayment	1 if program stipulates loan and/or debt requirements for state/federal education loans
	Drug test reporting	1 if program requires students to take a drug test; 0 otherwise
	Criminal history reporting	1 if program requires students to self-report any aspect of criminal history beyond standard FAFSA reporting; 0 otherwise
	Code of conduct	1 if program requires other code of conduct; 0 otherwise
Enrollment logistics	Full-time enrollment	1 if program requires full-time enrollment (12 credit hours per semester); 0 otherwise
	Volunteer requirements	1 if program requires student to volunteer or do some type of community service in order to receive award; 0 otherwise
	Campus-specific requirements	1 if there are campus-specific requirements, i.e., campus can impose separate criteria in addition to state; 0 otherwise
	Field of study restriction	1 if program restricts student college enrollment in a field of study; 0 otherwise
	Continuous enrollment restriction	1 if program requires students to maintain continuous enrollment to maintain award; 0 otherwise
	Mentoring requirement	1 if program requires students to undergo behavioral support programming to maintain aid; 0 if otherwise

Table 3. Random effects regression results

Targeted population	Administrative burden index	List of program(s) targeted toward specific population
Students with financial need	-3.622	Student Assistance Award (*n*=1)
	(2.286)	
Racially minoritized students	5.009*	Minority Teacher Fellows (*n*=1)
	(2.256)	
Only students at technical and community colleges	-2.819+	Community College Reconnect, TCAT Reconnect, Wilder-Naifeh Technical Skills
	(1.475)	Grant (*n*=3)
Includes students at technical and community colleges	2.126	Aspire, Community College Reconnect, General Assembly Merit, TCAT Reconnect,
	(1.762)	Wilder-Naifeh Technical Skills Grant, Graduate Nursing Loan Forgiveness, HOPE, HOPE Access, Minority Teaching Fellows, McAuliffe Scholarship, Ned McWherter Scholarship, Promise, MST Loan Forgiveness, Reconnect, Rural Health Loan Forgiveness, Student Assistance Award, Teaching Scholars (*n*=17)
Students meeting specific academic thresholds	3.063**	General Assembly Merit, HOPE, Minority Teaching Fellows, McAuliffe
	(0.995)	Scholarship, Ned McWherter Scholarship, Teaching Scholars (*n*=6)
Only students at four-year universities	-2.126	HOPE Non-traditional, STEP UP (*n*=2)
	(1.762)	
Includes students at four-year universities	2.819+	HOPE Non-traditional, STEP UP, Aspire, General Assembly Merit, Graduate
	(1.475)	Nursing Loan Forgiveness, HOPE, HOPE Access, Minority Teaching Scholars, McAuliffe Scholarship, Ned McWherter Scholarship, Promise, MST Loan Forgiveness, Reconnect, Rural Health Loan Forgiveness, Students Assistance Award, Teaching Scholars (*n*=16)
Number of observations	**169**	

Notes. Results come from separate random effects regression models in which programs are coded as 1 if they are targeted toward the specific population of students and all other state aid programs in Tennessee are coded as 0 (referent group). All models control for the average aid award (logged) and year fixed effects. The outcome is the level of administrative burden in a given program in a given year.

+ p<.10 * p<.05, ** p<.01

Appendix A:
Tennessee State Financial Aid Program Descriptions

Tennessee HOPE Financial Aid Programs

The suite of Tennessee HOPE Scholarship programs first came available to students enrolling at Tennessee postsecondary institutions in Fall 2004. The current study analyzes student eligibility requirements across six HOPE programs: HOPE, HOPE Access, the Aspire Award, the General Assembly Merit Scholarship, the HOPE Non-Traditional Scholarship (which began offering aid in Fall 2005), and the Wilder-Naifeh Technical Skills Grant.

HOPE financial aid programs are funded from the net proceeds of the Tennessee Education Lottery Scholarship program (hereafter referred to as TELS). TELS state administrative code sets forth general student eligibility requirements for all students who receive TELS-funded financial aid, regardless of the specific HOPE aid program. TELS code states that HOPE aid recipients shall:

1. Be a Tennessee citizen; and
2. Be a Tennessee resident pursuant to T.C.A § 49-8-104 [2016]; and
3. Make application for a TELS award by submitting the FAFSA or Renewal FAFSA as required by Tenn. Comp. R. & Regs. 1640-01-19-.03 [2015]; and
4. Be admitted to and enrolled in eligible postsecondary institution; and
5. Comply with United States Selective Service System requirements; for registration, if such requirements are applicable to the student; and
6. Be in compliance with federal drug-free rules and laws for receiving financial assistance; and
7. Meet each qualification relating to the relevant TELS award and applicable to the student; and
8. Not be in default on a federal Title IV educational loan or Tennessee educational loan; and
9. Not owe a refund on a federal Title IV student financial aid program or a Tennessee financial aid program; and
10. Not be incarcerated. *(Text taken from Tenn. Comp. R. & Regs. 1640-01-19-.02, 2021.)*

TELS financial aid programs provide support to students enrolled throughout the state's public colleges, universities, or private colleges, across two- and four-year sectors, including Tennessee College of Applied Technology (TCATs) (T.C.A § 49-4-902, 2022). TELS does not provide aid to students enrolled in proprietary institutions within the state.

Students apply for all TELS-funded programs by submitting the Free Application for Federal Student Aid (FAFSA). For the five of the HOPE aid programs analyzed in the current study, students enrolling in a Fall term must submit the FAFSA by September 1; Spring/Summer enrollments must submit the form by February 1 (the Wilder-Naifeh Technical Skills grant maintains a different set of application deadlines broken down by enrollment term). No additional application forms are required. All TELS funded-programs are coded as first-come, first-serve programs in our dataset because "early application is recommended" (Tennessee HOPE Scholarship, 2020).

Full-time enrollment is not stipulated for TELS aid recipients, however, receipt of aid does require continuous enrollment at the student's eligible postsecondary institution of choice (Tenn. Comp. R. & Regs. 1640-01-19-.02, 2021).

Additional student eligibility requirements are broken down by individual HOPE aid programs.

Tennessee HOPE

The Tennessee HOPE Scholarship (hereafter referred to as TN HOPE) provides merit-based financial aid to "entering freshmen who are enrolled at an eligible postsecondary institution within sixteen (16) months after graduating from an eligible Tennessee high school" (Tennessee HOPE Scholarship, 2020). Eligible postsecondary institutions include those public/private four-year and two-year institutions across the state, not including Tennessee Colleges of Applied Technology (TCATs).

Award amounts vary depending on the type of postsecondary institution attended, as well as the timing of aid receipt. For entering freshmen beginning with Fall 2015 and thereafter (NOTE: class status is determined by the postsecondary institution):

1. **Four-Year institutions** and **Two-Year institution** with on-campus housing: Up to $1,750 per full-time enrollment semester as a freshman and sophomore; then up to $2,250 per full-time enrollment semester as a junior and senior; including summer.
2. **Two-Year Institutions** Up to $1,500 per full-time enrollment semester as a freshman and sophomore; including summer. *(Text taken from Tennessee HOPE Scholarship, 2020.)*

For students who first received TN HOPE in Fall 2009 through Summer 2015:

1. **Four-Year institutions** and **Two-Year institutions** with on-campus housing: Up to $2,000 per full-time enrollment semester; including summer.
2. **Two-Year institutions:** Up to $1,000 per full-time enrollment semester; including summer. *(Text taken from Tennessee HOPE Scholarship, 2020.)*

Entering freshmen must meet the following TN HOPE eligibility criteria in addition to the TELS general eligibility requirements:

1. Have been a Tennessee resident for one year by September 1 of the application date. For students beginning spring and summer terms, residency determined by February 1 as of application date;
2. Graduate from a TN eligible high school;
3. Enroll in one of the Tennessee public colleges, universities, or private colleges;
4. Achieve a minimum of a 21 ACT or a minimum of a 1060 SAT, exclusive of the essay and optional subject area battery tests (concordant equivalent score) OR Overall minimum 3.0 grade point average

    a. Home School graduates – minimum 21 ACT exclusive of the essay and optional subject area battery tests
    b. GED recipients – minimum 21 ACT exclusive of the essay and optional subject area battery tests and qualifying GED score (minimum average Revised GED score is 170)

   c. HiSet recipients – minimum 21 ACT exclusive of the essay and optional subject area battery tests and qualifying HiSet score (minimum average HiSet score is 15;

- ○ ACT/SAT exams must be taken on a national test date or state test date and prior to the first day of college enrollment. The ACT Residual test is not accepted.
- ○ Must enroll within 16 months following high school graduation at any postsecondary institutions. However, enrollment at an ineligible postsecondary institution during the 16 months will make the student permanently ineligible. *(Text taken from Tennessee HOPE Scholarship, 2020.)*

Tennessee HOPE Access

The Tennessee HOPE Access Grant (hereafter referred to as Access) provides a combination of merit- and need-based financial aid to eligible students in Tennessee. Eligible students must be enrolled in an eligible postsecondary institution no later than sixteen (16) months after graduating from high school (Tennessee HOPE Access Grant, 2020). Eligible postsecondary institutions include those public/private four-year and two-year institutions across the state, not including Tennessee Colleges of Applied Technology (TCATs).

Award amounts vary depending on the type of institution attended, as well as the timing of aid receipt. For students who first received HOPE in Fall 2009 through Summer 2015:

1. **Four-Year Institution:** Up to $1,375 per full-time enrollment semester; including summer.
2. **Two-Year Institutions:** Up to $875 per full-time enrollment semester; including summer. *(Text taken from Tennessee HOPE Access Grant, 2020.)*

For entering freshmen beginning with Fall 2015 and thereafter:

1. **Four-Year Institutions:** Up to $1,250 per full-time enrollment semester; including summer.
2. **Two-Year Institutions:** Up to $875 per full-time enrollment semester; including summer. *(Text taken from Tennessee HOPE Access Grant, 2020.)*

Students applying for Access funds must meet all general eligibility requirements for TELS-funded state scholarships. Other Access student eligibility requirements include:

1. Have been a Tennessee resident for one year by September 1 of the application date. For students beginning spring and summer terms, residency is determined by February 1 as of application date;
2. Graduate from a TN eligible high school;
3. Enroll in one of the Tennessee public colleges, universities, or private colleges;
4. Entering freshmen must have a final high school GPA between 2.75-2.99 AND between an 18-20 ACT or between 960-1050 SAT, exclusive of the essay and optional subject area battery tests;
      a. Because the final high school GPA and the composite test score on the ACT/SAT range must fall between a specific range in order to qualify for this grant, entering freshmen cannot also academically qualify for the TN HOPE Scholarships at the same time;
5. ACT/SAT exams must be taken on a national test date or state test date and prior to the first day of college enrollment after high school graduation. The ACT Residual test is not accepted;

6. Be admitted to and enroll in an eligible postsecondary institution no later than sixteen (16) months after graduation from an eligible high school. *(Text taken from Tennessee HOPE Access Grant, 2020.)*

Tennessee HOPE Non-Traditional

The Tennessee HOPE Non-Traditional Scholarship program (hereafter referred to as HOPE-Non) provides a combination of need- and merit-based age to non-traditional age students. HOPE-Non funds are awarded to students of at least 25 years of age who:

> *enroll in a baccalaureate degree program at an eligible four-year postsecondary institution on or after August 1, 2018, as wither an entering freshman or with at least two (2) years after last attending any postsecondary institution; or enroll in a baccalaureate degree program at all eligible four-year postsecondary institution on or after August 1, 2018 while maintaining continuous enrollment following the completion of an associate degree as a TN Reconnect recipient. (Text taken from Tennessee HOPE Scholarship – Nontraditional, 2020.)*

Eligible four-year postsecondary institutions include the public and not-for-profit private sectors.

Award amounts vary by the type of postsecondary institution attended. For entering freshmen beginning with Fall 2015 and thereafter (NOTE: class status is determined by the postsecondary institutions):

1. **Four-Year institutions** and **Two-Year institutions** with on-campus housing: Up to $1,750 per full-time enrollment semester as a freshman and sophomore; then up to $2,250 per full-time enrollment semester as a junior and senior; including summer.
2. Up to $1,500 per full-time enrollment semester as a freshman and sophomore; including summer. *(Text taken from Tennessee HOPE Scholarship – Nontraditional, 2020.)*

For students who first received HOPE in Fall 2009 through Summer 2015:

1. **Four-Year institutions** and **Two-Year institutions** with on-campus housing: Up to $2,000 per full-time enrollment semester; including summer.
2. **Two-Year institutions:** Up to $1,000 per full-time enrollment semester; including summer. *(Text taken from (Tennessee HOPE Scholarship – Nontraditional, 2020.)*

Students who apply for HOPE-Non funds are expected to meet all TELS general eligibility requirements. Additional student eligibility requirements specific to the HOPE-Non program include:

1. Have been a Tennessee resident for one year by September 1 of the application date. For students beginning spring and summer terms, residency determined by February 1 as of application date;
2. Be at least 25 years of age and enroll in a baccalaureate degree program at an eligible four-year postsecondary institution on or after August 1, 2018, as either an entering freshman or with at least two (2) years after last attending any postsecondary institution; or,

   a. Enroll in a baccalaureate degree program at an eligible four-year postsecondary institution on or after August 1, 2018 while maintaining continuous enrollment following the completion of an associate degree as a Tennessee Reconnect aid recipient;

3. Have an adjusted gross income of $36,000 or less on IRS tax form;
4. Be continuously enrolled at an eligible postsecondary institution in the fall and spring semesters and maintain satisfactory academic progress;
5. Have a minimum cumulative GPA of 2.75 after 12 attempted semester hours or required GPA or subsequent benchmark. (Attempted hours and college grades prior to re-enrollment at an eligible postsecondary institution after at least a two year break in enrollment are not considered.);
6. Enroll in one of the Tennessee public colleges, universities, or private colleges. *(Text taken from (Tennessee HOPE Scholarship – Nontraditional, 2020.)*

Unlike other HOPE financial aid programs, HOPE-Non does not impose a limit on aid eligibility after high school graduation. The program requires a minimum college GPA for those students over the age of 25 who re-enroll at an eligible postsecondary institution within two years of prior attendance, which we coded as an academic requirement that could potentially impose an administrative burden on the program's aid applicants.

Students who apply for and receive for HOPE-Non aid are ineligible to apply for funds stemming from the TELS-funded Aspire Award or General Merit Assembly Scholarship.

Aspire Award

The Aspire Award (hereafter referred to as Aspire) is awarded to "entering freshmen as a supplement to the TN HOPE Scholarship" (Aspire Award, 2020). Eligible students must enroll in an eligible postsecondary institution no later than sixteen (16) months after graduating from high school. Eligible postsecondary institutions include those public/private four-year and two-year institutions across the state, not including Tennessee Colleges of Applied Technology (TCATs).

Award amounts vary depending on the type of institution attended, as well as the timing of aid receipt. For students who first received HOPE in Fall 2009 through Summer 2015:

1. **Four-Year institutions:** Up to $750 per semester as a supplement to the HOPE Scholarship; including summer.
2. **Two-Year institutions:** Up to $750 per semester as a supplement to the HOPE scholarship; including summer. *(Text taken from Aspire Award, 2020.)*

For entering freshmen beginning with Fall 2015 and thereafter:

1. **Four-Year institutions:** Up to $750 per semester as a supplement to the HOPE Scholarship; including summer.
2. **Two-Year institutions:** Up to $250 per semester as a supplement to the HOPE Scholarship; including summer. *(Text taken from Aspire Award, 2020.)*

Recipients of Aspire funds are expected to meet all TELS-funded general eligibility requirements, plus "parents' or independent student's spouse's adjusted gross income of $36,000 or less IRS tax form" (Aspire Award, 2020).

A student eligible for both the Aspire Award and the General Merit Assembly Scholarship shall be awarded the Aspire Award but shall not simultaneously receive both awards. Recipients of the HOPE Non-Traditional funding are ineligible for the Aspire Award.

General Assembly Merit Scholarship

The General Assembly Merit Scholarship (hereafter referred to as GAMS) provides merit-based aid "to entering freshmen as a supplement to the HOPE Scholarship program" (General Assembly Merit Scholarship, 2020). Eligible postsecondary institutions include public/private four-year and two-year institutions across the state, not including Tennessee Colleges of Applied Technology (TCATs).

For students who first received HOPE aid in Fall 2009 and thereafter (General Assembly Merit Scholarship, 2020): GAMS provides supplemental award amounts up to $1,500 (in addition to any TN HOPE funds received); annual award amounts are divided equally between fall, spring, and summer semesters; and awards to part-time students are pro-rated.

Recipients of GAMS aid are expected to meet all TN HOPE general eligibility requirements, including the time limit on aid eligibility after high school graduation (eligible students must be admitted to and enrolled in an eligible postsecondary institution no later than sixteen (16) months after graduating from high school). Other GAMS-specific student eligibility requirements include:

1. Students graduating from a Tennessee public school or category I, II, III private school must have a minimum 3.75 GPA AND 29 ACT or a minimum 1330 SAT, exclusive of the essay and optional subject area battery tests;
2. ACT/SAT exams must be taken on national test date or state test date and prior to the first day of college enrollment after high school graduation. The ACT Residual test is not accepted;
3. Students graduating from Homeschool programs (and non-category, I, II, & III Schools), in addition to meeting the HOPE scholarship requirements, and during the course of a homeschool program, must meet the minimum academic requirements to qualify for GAMS. *(Text taken from General Assembly Merit Scholarship, 2020.)*

A student eligible for both the Aspire Award and the General Merit Assembly Scholarship can be awarded the Aspire Award but cannot not simultaneously receive both awards.

Wilder-Naifeh Technical Skills Grant

The Wilder-Naifeh Technical Skills Grant (hereafter referred to as WNTS) was also established and funded from the net proceeds of the Tennessee Education Lottery Scholarship (TELS) program alongside the suite of HOPE scholarship programs. WNTS is awarded to students who are enrolled at a Tennessee College of Applied Technology (TCAT). The program is available to "all students enrolled at a TCAT who have been Tennessee residents for one (1) year prior to enrollment" (Wilder-Naifeh Technical Skills Grant, 2020). The program does not delineate any merit- or need-based eligibility requirements, nor any combination thereof. WNTS awards cover costs of attendance up to $2,000.

Students apply for WNTS funds by submitting a FAFSA. Deadlines for application break down by the term enrolled: November 1 (Fall), March 1 (Winter/Spring); July 1 (Summer) (Wilder-Naifeh Technical Skills Grant, 2020). There is no time limit for applicants to apply for WNTS funds after high school graduation. No minimum number of enrollment hours are required for WNTS eligibility.

WNTS recipients are expected to meet TELS ineligibility requirements (T.C.A. § 49-4-904, 2003). Additional WNTS-specific student eligibility requirements include:

1. Enroll in a certificate or diploma program at a TCAT and maintain satisfactory academic progress and continuous enrollment.
2. Cannot be a prior recipient of the Wilder-Naifeh Technical Skills Grant. *(Text taken from Wilder-Naifeh Technical Skills Grant, 2020.)*

WNTS grants may not be used for continuing education courses and students can only receive one (1) WNTS grant over time (T.C.A. § 49-4-921, 2022).

Tennessee Reconnect Aid Programs

Over time, the suite of Tennessee Reconnect aid programs has encompassed three different scholarship applications: the TCAT Reconnect Grant, the Community College Reconnect Grant, and Tennessee Reconnect.

TCAT Reconnect Grant

The Tennessee College of Applied Technology (TCAT) Reconnect Grant (hereafter referred to as TCAT Reconnect) was established via the Tennessee Promise Scholarship Act of 2014 (T.C.A. § 49-4-708, 2014). Per communications with a state contact, the statutory title of the program is "Wilder-Naifeh Reconnect Grant", but in programmatic discussions the program is referred to as "TCAT Reconnect". The name was shortened after its introduction in 2015 for communication purposes and administering the program. The Wilder-Naifeh title first appeared on the TN financial aid website in July 2015 (Wilder-Naifeh Reconnect Scholarship, 2015). By July 2016, website language was updated to reflect TCAT Reconnect nomenclature (TCAT Reconnect Scholarship, 2016).

TCAT Reconnect is designed for "students with a FAFSA status of independent" who are enrolled full-time at a TCAT campus (TCAT Reconnect Scholarship, 2020). TCAT Reconnect funds are restricted for use by students enrolled at TCAT institutions. The program does not delineate any merit- or need-based eligibility requirements, nor any combination thereof. TCAT Reconnect provides last-dollar financial aid packages: "award amount varies based on amount of remaining tuition and mandatory fees after all other gift aid has first been applied" (TCAT Reconnect Scholarship, 2020).

The FAFSA is the only application form students are required to submit in pursuit of TCAT Reconnect funding. Eligibility requirements from FY16 encourage students to submit the FAFSA by January 1 (Wilder-Naifeh Reconnect Scholarship, 2015). In FY18, deadline requirements change: FAFSA

applications must be received by July 1 for the Summer trimester, November 1 for the Fall trimester, and March 1 for the Winter/Spring trimester; application instructions are also amended to indicate that "early application is recommended" (TCAT Reconnect Scholarship, 2017).

TCAT Reconnect student eligibility requirements include:

1. Meet the requirements of §§ 49-4-904 [2003] and 49-4-905(a) [2020];
2. Be admitted to the institution in an eligible program of study;
3. Complete and file the FAFSA;
4. Be an independent student as determined by the FAFSA;
5. Enroll full-time as defined in T.C.A. § 49-4-708 [2022];
6. Maintain continuous enrollment;
7. Reapply annually to continue receiving funds;
8. Grants may not be used for continuing education courses;
9. No student shall be eligible for more than one (1) TCAT Reconnect grant at a time. *(Text taken from T.C.A. § 49-4-923, 2021.)*

Community College Reconnect Grant

The Tennessee Reconnect Grant program was originally established as the Community College Reconnect Grant (hereafter referred to as CCRG), and first provided aid to students enrolled for Fall 2015. CCRG terminates in Summer 2018, at which point active CCRG recipients who remained eligible for the award began participating in the newly announced Tennessee Reconnect Grant program.

CCRG provided last-dollar scholarship funds "to offset tuition and mandatory fees associated with pursuing an associates degree at an eligible postsecondary institution after all other gift aid has been credited to tuition and mandatory fees" (Tenn. Comp. R. & Regs. 1640-01-27-.02, 2017). Returning adults must have previously completed a minimum of 30 credit hours and have not attended a postsecondary institution for at least 12 months prior to enrollment (Community College Reconnect Grant, 2017). The program does not delineate any merit- or need-based eligibility requirements, or any combination thereof. CCRG funds could be used across the state's public two-year community college sector, not including Tennessee Colleges of Applied Technology (TCATs).

Institutions "determine[d] eligible recipients based on a first-come, first-served methodology and the availability of funding" (Community College Reconnect Grant, 2017). Students applied to CCRG funds via FAFSA submission (deadlines included: September 1 (Fall) and February 1 (Spring/Summer)). No additional application forms were required.

Student eligibility requirements included:

1. Tennessee resident and a U.S. citizen, or eligible non-citizen;
2. File the FAFSA by the deadline date;
3. Be in pursuit of an associate degree;
4. Have previously earned at least 30 hours toward an associate degree;
5. Not enrolled in or attended any postsecondary institution for at least 12 months;

6. Enroll in and attend at least nine (9) hours at a Tennessee community college;
7. Maintain a minimum of 2.0 GPA and satisfactory academic progress. *(Text taken from Community College Reconnect Grant, 2017.)*

CCRG applicants were not required to provide any prior documentation of GPA or test scores from high school. The stipulation regarding nine-hour enrollment equates to a full-time enrollment requirement. Students were also required to remain continuously enrolled in order to continue receiving the award.

Tennessee Reconnect Grant Program

The Tennessee Reconnect Grant program (hereafter referred to as Reconnect) began operation in Fall 2018. Reconnect funds are available to "students who have not previously earned an associate or baccalaureate degree, are independent according to FAFSA rules, and are enrolled part-time in an eligible program of study" (Tennessee Reconnect Grant, 2020). The program does not delineate any merit- or need-based eligibility requirements, or any combination thereof.

Prior to the availability of Reconnect funds in Fall 2018, students using CCRG funds were restricted to enrollment at community colleges, not including TCATs. Reconnect expanded the CCRG framework for students enrolled in associate degree programs across four-year, two-year, and private sectors, including (TCATs). Reconnect also made it possible for students to enroll in eligible two-year programs at eligible four-year colleges or universities.

Reconnect "award amounts vary based on the amount of remaining tuition and mandatory fees after all other gift aid has first been applied" (a last-dollar aid program) (Tennessee Reconnect Grant, 2020).

Students must submit the FAFSA in order to apply for Reconnect funds: September 1 (Fall) and February 1 (Spring/Summer) (Tennessee Reconnect Grant, 2020). Students must also submit a separate Reconnect application via the Tennessee Student Assistance Corporation (TSAC) Portal.

Reconnect student eligibility requirements include:

1. Tennessee residency for one (1) year prior to date of application;
2. File the FAFSA annually and be classified as an independent student;
3. Be enrolled in a federal Title IV eligible curriculum of courses leading to a certificate or associate degree;
4. Not have previously earned an associates degree or baccalaureate degree;
5. Enroll in and attend at least six (6) hours at an eligible institution (continuous, part-time enrollment);
6. Maintain a minimum 2.0 cumulative GPA at the end of the academic year as determined by the institution;
7. Participate in a college success program, as determined by the Tennessee Higher Education Commission (THEC);

8. Not be ineligible for the grant under T.C.A. 49-4-904 [2003]. *(Text taken from Tennessee Reconnect Grant, 2020.)*

As stated, the Reconnect program requires recipients to participate in a college success program. No explanatory details are provided in either the state's administrative code or the TN financial aid website.

Tennessee Promise

The Tennessee Promise scholarship (hereafter referred to as Promise) began offering aid to students in the 2014-2015 academic year. Promise is available to "Tennessee residents, U.S. citizens, and eligible non-citizens who graduate from an eligible high school, homeschool, or earn a GED/HiSet prior to their nineteenth (19th) birthday" (Tennessee Promise Scholarship, 2020). The program does not delineate any merit- or need-based eligibility requirements, nor any combination thereof. Instead, promise provides "last-dollar financial aid, mentoring, and community service opportunities for Tennessee students" (Tenn. Comp. R. & Regs. 1640-01-26-.01, 2019).

Promise funds can be used in two-year programs across the state's public four- and two-year sectors, including Tennessee Colleges of Applied Technology (TCATs) and private, non-profit technical schools (Tenn. Comp. R. & Regs. 1640-01-26-.03, 2017). Students must be enrolled full-time in an eligible postsecondary institution in order to maintain eligibility for the program and continuous enrollment is expected except for approved medical or personal leaves of absence (Tenn. Comp. R. & Regs. 1640-01-26-.04, 2019).

Promise is primarily coded as a last-dollar program. At four-year institutions, however, Promise does not function as a last-dollar program. The amount of Promise funding received for an associate degree program at a four-year institution will be based on the average amount of tuition and fees at a community college (T.C.A. § 49-4-708, 2022).

Promise aid recipients are required to attend mandatory meetings, participate in a mentoring program, and perform 8 hours of community service each term the award is received (Tennessee Promise Scholarship, 2020).

Students are required to complete a stand-alone Promise application via the TSAC application portal by November 1 each year; FAFSA applications must also be submitted by February 1 (Tennessee Promise Scholarship, 2020). The program's FAFSA submission deadline changes over time, likely reflecting updates to federal application guidelines.

Promise administrative code makes no mention of access to aid for incarcerated students or undocumented students. The code also lacks any reference to requirements regarding student loan repayment/default, as stipulated by other aid programs in the state.

Tennessee Student Assistance Award

First established in 1974, the Tennessee Student Assistance Award program (hereafter referred to as TSAA) was designed to provide "non-repayable assistance to financially needy undergraduate students who are residents of Tennessee" (Tennessee Student Assistance Award, 2020). The TSAA is a first-dollar, need-based grant aid program, funded in part by the Tennessee Education Lottery Scholarship (TELS) program and (at one point) federal LEAP/SLEAP program (Tennessee Student Assistance Award, 2010).

Maximum award amounts are determined by the TSAC Board of Directors prior to the beginning of the fall term. The amount of the award is based on the institution indicated on the student's FAFSA. Award amounts depend on the type of institution attended:

1. Four-Year/Two-year private: $4,000.
2. Four-Year public: $2,000.
3. Two-Year public: $1,300.
4. Career Schools: $2,000.
5. Tennessee College of Applied Technology: $1,000. (Tennessee Reconnect Grant, 2020)

Students apply for TSAA funds by submitting the FAFSA annually. In FY11, the TSAA website instructs students to submit their FAFSA as soon as possible after January 1, and includes a priority deadline of February 15 (Tennessee Student Assistance Award, 2010). Because these instructions do not impose a state-specific deadline after which students cannot apply for TSAA funds each year, the program deadline is coded as "0" for FY11-FY14. In FY12, the priority deadline language was removed from the TSAA website, though it still encourages students to apply as soon as possible after January 1 (Tennessee Student Assistance Award, 2011). The consistent "early application" language led us to code the program as first-come, first-serve.

In FY15, the TN state financial aid website introduced a new TSAA deadline component (Tennessee Student Assistance Award, 2014). The standard "apply as soon as possible after January 1" dictum remains in place. However, new language then states that prior-year recipients (renewals) will receive the award if they meet all eligibility requirements and complete the FAFSA on or before March 1. After March 1, remaining funds are awarded to the neediest applicants who apply by March 1 based on the availability of funds (awards to be made until funds are depleted). In FY18, the March 1 deadline became a January 17 deadline in response to the expanded FAFSA application window (Tennessee Student Assistance Award, 2017). This deadline changes again in FY20, to February 1 (Tennessee Student Assistance Award, 2019). From FY15-FY21, the deadline variable is coded "1". The priority deadline is noted for FY21 only.

The Tennessee Student Assistance Corporation (TSAC) administers the TSAA. TSAA promulgated rules do not include a time limit after graduating high school in which students must apply for TSAA.

However, the TSAA website updates in FY14 to include the following stipulation: to be eligible, the applicant must not have already received a baccalaureate degree (Tennessee Student Assistance Award, 2014).

TSAA is one of only two state-funded aid programs over time to provide aid to all postsecondary educational sectors, including Tennessee Colleges of Applied Technology (TCATs) and proprietary institutions (T.C.A. § 49-4-301, 2021). (The Christa McAuliffe Scholarship program also provided aid to all sectors, but the program was terminated in Summer 2020.)

State administrative code dictates that incarcerated students are ineligible to receive TSAA funds and also states that students who are citizens of the United States shall receive priority, providing no alternative pathway for undocumented students to apply for TSAA funds (T.C.A. § 49-4-301, 2021).

Eligible students must not owe a refund or repayment on any grant, and not be in default on any loan, received at any institution under provisions of Title IV of the Higher Education Act of 1965 (Tenn. Comp. R. & Regs. 1640-01-01-.02, 2015)

Tennessee STEP UP Scholarship

Effective May 2014, the Tennessee STEP UP Scholarship program (hereafter referred to as STEP UP) is "designed to assist students with intellectual disabilities who have completed high school and enroll in an individualized program of study of up to four (4) years at an eligible postsecondary institution" (Tennessee STEP UP Scholarship, 2020). The program does not delineate any merit- or need-based eligibility requirements, nor any combination thereof.

In FY15 and FY16, STEP students received $2,000 in aid (Tennessee STEP UP Scholarship, 2014; Tennessee STEP UP Scholarship, 2015). Beginning in FY17, the program begins to differentiates award amounts by class distinction, which is further amended for FY21 to reflect the following:

1. For entering students beginning with Fall 2015 and thereafter:
    a. Award amount is up to $1,750 per full-time enrollment semester as a freshman and sophomore then up to $2,250 per full-time enrollment semester as a junior and senior. Determination of class is made by the institution.
2. For students who first received STEP UP funds in Fall 2012 through Summer 2015:
    a. Students will continue to receive $2,000 per semester.
    b. The sum of all financial aid, including a STEP UP scholarship, for which a student qualifies, cannot exceed the institutional defined total cost of education at the eligible postsecondary institution the scholarship recipient is attending. If the total cost of education is exceeded then the STEP UP scholarship may be reduced. *(Text taken from Tennessee STEP UP Scholarship, 2020.)*

STEP UP student eligibility requirements include:

1. Not be ineligible for the scholarship under T.C.A. § 49-4-904;

2. Have been a Tennessee resident, as defined by regulations promulgated by the board of regents under § 49-8-104 [2016], for one (1) year immediately preceding the date of application for a scholarship or the renewal of the scholarship;

3. Complete high school in a Tennessee high school in accordance with the requirements of the student's Individualized Education Program (IEP) and receive a high school diploma, occupational diploma or certificate, a special education diploma, a transition certificate, or an IEP certificate;

4. Be admitted to and enroll in an eligible postsecondary institution in an eligible postsecondary program no later than sixteen (16) months after completing high school; and

5. Apply for a Tennessee STEP UP Scholarship each academic year. *(Text taken from Tennessee STEP UP Scholarship, 2020.)*

For academic years 14-15, 15-16, and 16-17, STEP UP funds were restricted to "two-year individualized program(s) at an eligible postsecondary institution" (Tennessee STEP UP Scholarship, 2016). This meant that funds could be spent at four-year institutions, but only for enrollment in two-year academic programs. In FY18, however, the program language is updated to allow funds to be used in "an individualized program of study of up to four (4) years at an eligible postsecondary institution" (Tennessee STEP UP Scholarship, 2017).

The defined list of eligible institutions and programs include Lipscomb University (IDEAL Program), Union University (Union EDGE Program), University of Memphis (TigerLIFE), University of Tennessee (UT FUTURE), and Vanderbilt University (Next Steps) (Tennessee STEP UP Scholarship, 2020).

Students and parents must complete the stand-alone STEP UP scholarship application and email the completed form to STEP.program@tn.gov. In addition, recipients must complete the FAFSA each academic year. Both the STEP UP form and the FAFSA must be submitted by September 1 for Fall enrollment, February 1 for Spring enrollment, and May for Summer enrollment (Tennessee STEP UP Scholarship, 2020).

STEP UP recipients must maintain continuous enrollment in the eligible postsecondary program of choice, but the program does not require full-time enrollment (T.C.A. § 49-4-943, 2020).

STEP UP administrative code makes no mention of access to aid for incarcerated students or undocumented students.

Ned McWherter Scholars Program

First established in 1986, the Ned McWherter Scholars program (hereafter referred to as NMS) is "intended to encourage academically superior Tennessee high school graduates to attend college in Tennessee" Tennessee high school seniors starting their last semester in high school may apply" (Ned McWherter Scholars Program, 2020). State administrative code from 2002 stipulates that applicants must "be an applicant for initial admission to college after high school graduation at the time of his/her initial application for the scholarship" (Chapter 1640-01-09-.02, 2002). Code from 2017 reflects the

following update: applicants must "enroll at an eligible postsecondary institution within sixteen (16) months following graduating from high school" (Tenn. Comp. R. & Regs. 1640-01-09-.02, 2017). We code the program as imposing a time limit for aid eligibility after high school graduation across all years in the dataset.

NMS provides merit-based financial aid awards of up to $6,000 per academic year ($3,000 from the State of Tennessee and $3,000 from the college or university attended) (Ned McWherter Scholars Program, 2020).

While NMS does not require applicants to submit the FAFSA, students must submit a stand-alone NMS application via the Tennessee Student Assistance Corporation (TSAC) portal which must be submitted by February 15 each year, alongside copies of their high school transcripts (containing grades through the first semester of senior year) and official ACT/SAT scores (Ned McWherter Scholars Program, 2020).

We code NMS as a first-come, first-serve program because, "NMS awards are competitive and are based on limited funding" (Ned McWherter Scholars Program, 2020).

NMS-specific student eligibility requirements include:

1. Be a resident of Tennessee, a U.S. citizen or permanent resident, and attend an eligible Tennessee college or university full-time;
2. Have at least a 3.5 unweighted grade point average;
3. Have a minimum composite score of 29 on the ACT (or concordant equivalent score on the SAT). *(Text taken from Tenn. Comp. R. & Regs. 1640-01-09-.02, 2017.)*

NMS funds may be used at public four- and two-year institutions, but are prohibited from use at Tennessee Colleges of Applied Technology (TCATs) and proprietary institutions (Tenn. Comp. R. & Regs. 1640-01-09-.03, 2017).

NMS administrative code names no mention of access to funds for incarcerated students or undocumented students, nor does the code stipulate and educational loan repayment/default requirements.

Christa McAuliffe Scholarship Program

Established in 1986, the Christa McAuliffe Scholarship program (hereafter referred to as CMSP) was created to "honor the memory of Christa McAuliffe, a high school teacher who lost her life in the space shuttle Challenger accident… [and was] designed to encourage promising Tennesseans who have a commitment to teaching and inspiring young minds to explore and achieve their highest potential" (Christa McAullife Scholarship Program, 2019). The program was terminated effective August 1, 2020 (T.C.A. § 49-4-705, 2020). There are alternate spellings of "McAuliffe" found across the program's documentation. CMSP administrative code spells the name "McAuliffe" (Tenn. Comp. R. & Regs. 1640-

01-10-.01, 1986). The TN state financial website consistently spells the name "McAullife" (Christa McAullife Scholarship Program, 2019). CMSP was "intended to assist and support Tennessee residents who have demonstrated a commitment to a career in educating the youth of Tennessee" (Tenn. Comp. R. & Regs. 1640-01-10-.01, 1986).

CMSP administrative code from 2002 is attached as the "promulgated rules" document for FY11-FY17 on the TN state financial aid website (Christa McAullife Scholarship Program, 2016). The TN state financial aid website consistently communicated a one-time award amount of $500 from FY11-FY20 (Christ McAullife Scholarship Program, 2019). However, all versions of the CMSP administrative code refer to a maximum award amount of $1,000 (Tenn. Comp. R. & Regs. 1640-01-10-.02, 1986).

According to a response from a state contact, there were no restrictions on the type of postsecondary institutions students can attend in receipt of CMSP funds. The state contact communicated that the program likely had less than 10 students total in the lifetime of the award. CMSP was one of only two state-funded grant programs within Tennessee that have provided aid to students across all postsecondary sectors over time, including TCATs and proprietary institutions. The Tennessee Student Assistance Award (TSAA) also provides aid to students across all institutional sectors.

In order to be eligible for CMSP funding, students must:

1. Be a rising college junior enrolled full-time in a teacher education program in an accredited Tennessee postsecondary institution;
2. Have completed at least their first semester of their junior year;
3. Have at least a 3.5 cumulative grade point average;
4. Have an ACT or SAT score that meets or exceeds the national norm. *(Text taken from Christa McAullife Scholarship Program, 2019.)*

Students applied for CMSP funds via the TSAC online portal by April 1 each year, alongside official college transcripts and an official SAT/ACT score, with no requirement to submit the FAFSA (Christa McAullife Scholarship Program, 2019). We code CMSP as first-come, first-serve because CMSP funds were "very competitive and [were] based on limited funding" (Christa McAullife Scholarship Program, 2019).

CMSP administrative code states that students must be enrolled full-time within their approved teacher education program (Tenn. Comp. R. & Regs. 1640-01-10-.04, 1992). While the code also required students to maintain a statement of compliance with federal drug-free rules and laws on file with their institution of choice; it makes no mention of loan repayment/default requirements typical of other aid programs in the state.

CMSP administrative code makes no mention of pathways to aid application for incarcerated students or undocumented students.

Tennessee Loan Forgiveness Programs

The State of Tennessee operates six loan forgiveness programs over time, five of which are analyzed in this study: the Graduate Nursing Loan-Forgiveness Program, Minority Teaching Fellows, Tennessee Teaching Scholars, the Tennessee Math & Science Teacher Loan Forgiveness Program, and the Tennessee Rural Health Loan Forgiveness Program. Each program is tied to a specific workforce sector, imposing explicit service obligations on all program recipients. These loan programs effectively function as traditional financial aid programs, unless the service obligation goes unmet. The programs share several similarities (based on authors' review of documents):

1. No FAFSA submission is required;
2. Recipients must be citizens and residents of both the United States and Tennessee;
3. Recipients must not be in default on a federal Title IV educational loan or Tennessee educational loan, and not owe a refund on a federal Title IV student financial aid program or a Tennessee student financial aid program;
4. Recipients must sign a promissory note tying their postgraduate employment to the relevant workforce sector before receiving any funds.

Graduate Nursing Loan-Forgiveness Program

Established April 1976, the Graduate Nursing Loan-Forgiveness program (hereafter referred to as GNLF) is "designed to encourage Tennessee residents who are registered nurses to become teachers and administrators in Tennessee nursing education programs" (Graduate Nursing Loan Forgiveness Program, 2020). The program does not indicate any need- or merit-based eligibility requirements for applicants, nor any combination thereof. GNLF recipients must be enrolled in eligible nursing education programs across the state's public and private, two- and four-year sectors.

The maximum award amount is seven thousand dollars ($7,000) per year during periods of full-time enrollment and three thousand five hundred dollars ($3,500) per year during periods of part-time enrollment (Tenn. Comp. R. & Regs. 1640-01-03-.04, 2013).

Participants in GNLF "incur an obligation to enter a faculty or administrative position at a college or university in Tennessee in a nursing education program" (Graduate Nursing Loan Forgiveness Program, 2020). Students are obligated to serve four (4) years in a faculty or administrative position following graduation in order to have the loan forgiven. If recipients do not meet this obligation the award must be repaid. Participants are allowed a grace period of three (3) months, which begins when the borrower either completes their eligible academic program or no longer meets graduate nursing loan eligibility requirements, and during which period of time interest does not accrue and repayment is not required (Tenn. Comp. R. & Regs. 1640-01-03-.02, 2014). Interest will accrue at the rate of nine percent (9%) per year starting at the end of the grace period (Tenn. Comp. R. & Regs. 1640-01-03-.06, 2014).

Students apply for GNLF via the Tennessee Student Assistance Corporation's (TSAC) online application portal. We code the program as first-come, first-serve because "awards are very competitive and are based on funding" (Graduate Nursing Loan Forgiveness Program, 2020). TSAC must receive the application by March 1 – this is considered a "priority application date" according to the program's administrative code (Tenn. Comp. R. & Regs. 1640-01-03-.02, 2014).

Award recipients must attend an eligible Tennessee college or university and be enrolled in a graduate program accredited by the National League for Nursing Accrediting Commission (NLNAC) and/or by the Commission on Collegiate Nursing Education (CCNE), which must also be approved by the Tennessee Board of Nursing and "lead to a master's or post-master's degree in a field of study which will qualify the graduate to become a teacher or administrator in a college or university education program in Tennessee" (Tenn. Comp. R. & Regs. 1640-01-03-.02, 2014).

GNLF student eligibility requirements include:

1. Hold an unencumbered Tennessee Registered Nurse License; and
2. Be enrolled either part-time or full-time in an eligible academic program at an eligible postsecondary institution (Eligibility is limited to four (4) years of full-time enrollment, or the equivalent part-time enrollment, with one (1) year of full-time enrollment equaling two (2) years of part-time enrollment. Eligibility is subject to the availability of funds); and
3. Provide written evidence of the student's intention to become employed full-time or part-time in a Tennessee nursing educational program in a teaching or administrative capacity; and
4. Maintain satisfactory academic progress; and
5. Agree to inform TSAC in writing when any change occurs in name, address, or school enrollment, and provide supporting documentation. After completing the program, the recipient shall continue to notify TSAC of any change in name or address, and when the recipient has obtained a teaching or administrative position, changed teaching or administrative positions, or terminated teaching or administrative positions. *(Text taken from Tenn. Comp. R. & Regs. 1640-01-03-.03, 2013.)*

Tennessee Math & Science Teacher Loan Forgiveness Program

Established in 2006, the Tennessee Math & Science Teacher Loan Forgiveness program (hereafter referred to as TMST) "provides financial assistance to Tennessee public school teachers seeking an advanced degree in a math or a science, or a certification to teach a math or a science" (Tennessee Math and Science Teacher Loan Forgiveness Program, 2020). "Science" refers to the study of biology, botany, chemistry, physics, zoology, geology, and other natural and physical sciences (Tenn. Comp. R. & Regs. 1640-01-20-.02, 2007). The program provides aid to students enrolled in eligible academic programs across the states' public and private, two- and four-year sectors. Program code does not stipulate any need- or merit-based aid eligibility requirements, nor any combination thereof.

TMST recipients are awarded two thousand ($2,000) per academic year, regardless of the number of terms enrolled within that academic year. The total amount of TMST funds a recipient may receive

over time shall not exceed ten thousand dollars ($10,000) for all years required for the teacher's program of study (Tenn. Comp. R. & Regs. 1640-01-20-.04, 2007).

Loan forgiveness requires employment in a Tennessee public school system two (2) years for each year of loan funding received. TMST recipients are allowed a grace period of three (3) months which begins when the borrower either completes their eligible academic program or no longer meets the TMST eligibility requirements(Tenn. Comp. R. & Regs. 1640-01-20-.02, 2007). Interest will not be charged for a TMST loan (Tenn. Comp. R. & Regs. 1640-01-20-.06, 2007). Repayment will begin at the end of the grace period, and continue in monthly installments over a period of no more than eight (8) years, provided that payments are a minimum of one hundred ($100) per month (Tenn. Comp. R. & Regs. 1640-01-20-.07, 2007).

Applicants must submit TMST forms annually; both the application form and the promissory note must be submitted via the Tennessee Student Assistance Corporation's (TSAC) online portal. The application deadline is September 1 for students enrolling in Fall, February 1 for students enrolling in Spring, and May 1 for students enrolling in Summer (Tennessee Math and Science Teacher Loan Forgiveness Program, 2020).

TMST eligibility requirements include:

1. Be a citizen of the United States; and
2. Be a citizen of Tennessee; and
3. Be a resident of Tennessee, as defined by regulations promulgated by the Tennessee Board of Regents for the state university and community college system, under the authority of T.C.A. § 49-8-104 [2016] where applicable for one (1) year immediately preceding the date of application; and
4. Be a tenured teacher teaching in a Tennessee public school system; and
5. Comply with the United States selective service requirement for registration, as such requirements are applicable to the student; and
6. Not be in default on a federal Title IV educational loan or a Tennessee educational loan; and
7. Be in compliance with federal drug-free rules and laws for receiving financial assistance; and
8. Not be incarcerated; and
9. Be admitted to and attend an eligible postsecondary institution seeking an advanced degree in a math or a science or certification to teach math or a science; and
10. Agree to teach math or a science in a Tennessee public school system two (2) academic years for each year funds are provided by this program and sign a promissory note that stipulates the cash repayment obligation incurred if the teaching service is not fulfilled; and
11. Maintain satisfactory academic progress in the teacher's program of study with no minimum number of hours required per semester; and
12. Complete the program of study within five (5) years beginning with the first terms for which the loan was awarded; and
13. Not allow a break in enrollment at an eligible postsecondary institution of more than twelve (12) months. If the break in enrollment exceeds twelve (12) months, the borrower enters the grace period followed by repayment. *(Text taken from Tenn. Comp. R. & Regs. 1640-01-20-.03, 2007.)*

The program's administrative code specifies no requirements for full-time, part-time, or continuous enrollment, nor does the code provide access to aid for undocumented students.

Tennessee Rural Health Loan Forgiveness Program

The Tennessee Rural Health Loan Forgiveness program (hereafter referred to as TRH) was established through the Tennessee Rural Health Act of 2008, which set up a five-year pilot program that provided loans and loan forgiveness to Tennessee health care providers and dentists (Tenn. Comp. R. & Regs. 1640-01-21-.01, 2009). TRH ceased offering new awards after the 2012-2013 academic year (Tennessee Rural Health Loan Forgiveness Program, 2013). Recipients had to be enrolled in eligible academic programs across the state's public and private, two- and four-year sectors. The program's administrative code does not specific any need- or merit-based aid eligibility requirements, nor any combination thereof. TRH awards did not exceed twelve thousand dollars ($12,000) per academic year (Tennessee Rural Health Loan Forgiveness Program, 2012).

Participation in TRH loan forgiveness "requires health care providers and dentists to locate and practice in a Tennessee health resource shortage area after becoming licensed to practice" (Tenn. Comp. R. & Regs. 1640-01-21-.01, 2009). If the service obligation is not met, the amount becomes a loan and must be repaid plus interest at nine percent (9%) annually from the date of disbursement (Tenn. Comp. R. & Regs. 1640-01-21-.06, 2009). TRH recipients are allowed a grace period of up to twelve (12) months which begins when the borrower either completes the program of study or no longer meets the TRH eligibility requirements, during which repayment is not required (Tenn. Comp. R. & Regs. 1640-01-21-.02, 2009).

The application deadline is September 1. Applicants submit documentation through the Tennessee Student Assistance Corporation's (TSAC) online portal and the application deadline is September 1 (Tenn. Comp. R. & Regs. 1640-01-21-.05, 2009).

TRH eligibility requirements include:

1. Be a citizen of Tennessee; and
2. Be a resident of Tennessee as defined by regulation promulgated by the Tennessee Board of Regents for the state university and community college system, under the authority of T.C.A. § 49-8-104 [2016] where applicable and under the rules of the University of Tennessee system as of the date of application and on the date of reapplication for the loan each academic year; and
3. Comply with the United States selective Service system requirement for registration, as such requirements are applicable to the borrower; and
4. Not be in default on a federal Title IV educational loan or Tennessee educational loan; and
5. Be in compliance with federal drug-free rules and laws for receiving financial assistance (being compliant means for felony possession of or selling of illegal drug charges while receiving Federal Student Aid); and
6. Not be incarcerated; and

7. Be admitted to and attend an eligible postsecondary institution seeking an advanced degree in an eligible program of study; and

8. As a service obligation of this loan, the borrower agrees to:

    a. Practice medicine in a health resource shortage area after becoming a Tennessee licensed physician, osteopathic physician, or physician assistant or receiving a Tennessee certificate of fitness as a nurse practitioner for one (1) year for each year of funding provided by TRH and sign a promissory note that stipulates the cash repayment obligation incurred with interest if the service obligation is not fulfilled; or

    b. Practice dentistry in a health resource shortage area after becoming a licensed Tennessee dentist one (1) year for each year of funding provided by TRH and sign a promissory note that stipulates the cash repayment obligation incurred with interest if the service obligation is not fulfilled.

9. Maintain satisfactory academic progress in the program of study in which the borrower is enrolled; and

10. Complete the program of study in this five-year pilot program no later than Spring 2013; and

11. Not accept any other financial assistance that carries with it a service obligation after graduation and receipt of the applicable license to practice medicine or dentistry, except for a service obligation in the United States armed forces, reserve, or the National Guard. The service obligation period shall not exceed six (6) years. *(Text taken from Tenn. Comp. R. & Regs. 1640-01-21-.03, 2009.)*

The program did not include any stipulations regarding full-time, part-time, or continuous enrollment. No pathways to aid access were available for undocumented students.

Minority Teaching Fellows Program

First established in 1989, the Minority Teaching Fellows program (hereafter referred to as MTF) is a merit-based aid program intended to "encourage talented minority Tennesseans to enter the teaching field in Tennessee" (Minority Teaching Fellows Program, 2020). MTF awards provide $5,000 per year for students who enroll in a teacher certification program at an eligible Tennessee college or university.

According to MTF administrative code, a "minority" student is a person who is:

African American, a person having origins in any of the black racial groups of Africa; Hispanic, a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race; Asian American, a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands; or Native American, a person having origins in any of the original peoples of North America. [NOTE: This definition does not change over time.] *(Text taken from Tenn. Comp. R. & Regs. 1640-01-13-.02, 2014.)*

Eligible students include: high school seniors who have achieved at least a 2.75 high school cumulative grade point average, and either scored a minimum composite score of 18 on the ACT or 860 SAT (math and critical reading only), or be in the top 25 percent of their high school graduation class; or,

continuing college students who have achieved at least a 2.5 cumulative grade point average (Minority Teaching Fellows Program, 2020).

MTF funds are intended primarily for use at Tennessee's public four-year institutions. However, MTF funds may also be granted to students admitted to or enrolled in an accredited two-year institution of higher education, provided that a plan of study is pursued which is transferable to a college or university in Tennessee and will lead to licensure, which will then be used to teach in a public school at some prekindergarten, kindergarten, elementary, or secondary level in the State, provided that the plan of study can be completed within a four-year period calculated from the date of the first disbursement (Tenn. Comp. R. & Regs.1640-01-13-.03, 2013).

MTF applicants must submit their application materials by April 15. The program is considered first-come, first-serve because "awards are very competitive and based on funding," but the program does not impose a deadline for priority consideration (Minority Teaching Fellows Program, 2020). It does not appear that students are required to submit FAFSA documentation alongside the stand-alone MTF application via the Tennessee Student Assistance Corporation (TSAC) online application portal.

MTF student eligibility requirements include:

1. Be a minority;
2. Be admitted to or enrolled in an accredited institution of higher education in Tennessee from which credits earned are recognized by the State to be applicable to a teacher certification program. Loans may also be granted to students admitted to or enrolled in an accredited two-year institution of higher education, provided that a plan of study is pursued which is transferable to a college or university in Tennessee and will lead to licensure, which will then be used to teach in a public school at some prekindergarten, kindergarten, elementary, or secondary level in the State, provided that the plan of study can be completed within a four-year period calculated from the date of the first disbursement;
3. Submit to TSAC a signed Statement of Intent to teach in a Tennessee public prekindergarten, kindergarten, elementary, or secondary school;
4. Not accept any financial aid that carries with it a conflicting service obligation. For the purposes of this program, participation in the Tennessee Teaching Scholars Program shall be considered as accepting aid that carries a conflicting service obligation;
5. Submit a completed application to TSAC by the established deadline on a TSAC-approved application;
6. Submit to TSAC copies of all official transcripts and the most recent test scores;
7. Agree to inform TSAC in writing when any significant change in status occurs and provide documentation to support it. This shall include, but is not limited to, changes in name, address, and enrollment. After obtaining teacher licensure, the recipient shall inform TSAC when they have obtained a teaching position, changed teaching assignments, or terminated teaching service. *(Text taken from Tenn. Comp. R. & Regs.1640-01-13-.03, 2013.)*

Application materials must include:

1. A 250-word essay on "Why I Chose Teaching as a Profession";

2. Two recommendation letters: one from a school official and one from a person in the applicant's community;
3. A list of extracurricular activities;
4. An official high school transcript with official ACT/SAT scores for high school applicants or an official college transcript for continuing college students;
5. A signed Promissory Note to teach full-time in a Tennessee public prekindergarten, kindergarten, elementary, or secondary school, one (1) year of service for each year an award is received. *(Text taken from Tenn. Comp. R. & Regs.1640-01-13-.03, 2013.)*

A grace period of one (1) year is granted to allow recipients opportunity to secure employment to begin cancellation credit accrual (Tenn. Comp. R. & Regs. 1640-01-13-.05, 2014). If recipients do not meet their obligations, the award must be repaid to TSAC. Repayment will begin if the recipient does not complete the plan of study or is not employed at an eligible PreK-12 school. When a repayment schedule is imposed, the interest accrues at nine percent (9%) from the date of graduation or withdrawal from the program (Tenn. Comp. R. & Regs. 1640-01-13-.05, 2014).

MTF program administrative code makes no mention of eligibility for incarcerated students or undocumented students.

Tennessee Teaching Scholars

The Tennessee Teaching Scholars program (hereafter referred to as TTS) was established by Public Act in 1996. The program is intended to "encourage exemplary students to enter the teaching field in Tennessee. Participation is limited to college juniors, seniors, and post-baccalaureate candidates admitted to a teacher education program in a Tennessee college or university" (Tennessee Teaching Scholars, 2020).

No FAFSA submission is required for this merit-based aid program. Annual award amounts are unknown.

TTS student eligibility requirements include:

1. Be a Tennessee resident and a U.S. citizen;
2. Have at least a 2.75 cumulative GPA or higher (if required for the teacher education program at the school of choice);
3. Be enrolled full-time if undergraduate and at least half-time if a graduate student;
4. Not be a licensed teacher or receive the scholarship while employed in a teaching position;
5. Submit a signed Statement of Intent to teach full-time, one year for each year an award is received;
6. Submit a Letter of Recommendation from an official of a State-approved teacher education program to which the student has been admitted;
7. Not accept any financial aid that carries with it a conflicting service obligation. Participation in the Minority Teaching Fellows program shall be considered as accepting aid that carries a conflicting service obligation;

8. Shall now owe a refund or repayment on any grant and is not in default on any loan received at any postsecondary institution, under the provisions of Title IV of the Higher Education Act of 1965, as amended. *(Text taken from Tenn. Comp. R. & Regs.1640-01-17-.03, 2013.)*

Students submit TTS applications via the Tennessee Student Assistance Corporation (TSAC) portal). Completed application must be submitted by April 15. Applications must include:

1. A letter of recommendation from an official of a state-approved teacher education program, attesting to the applicant's commitment to teaching and potential for success as a teacher
2. Official copies of all college or university transcripts and documentation verifying the standardized test scores used for admission to the teacher education program. *(Text taken from Tennessee Teaching Scholars Program, 2020.)*

Students receive a grace period of one (1) year that will begin on the date the student completes their plan of study, during which repayment is not required (Tenn. Comp. R. & Regs. 1640-01-17-.05, 2014). Repayment will begin if the recipient does not complete the plan of study or is not employed at an eligible PreK-12 school. Interest accrues at 9 percent (9%) from the date of each disbursement. Recipients must be employed as a full-time teacher to be considered for forgiveness (Tenn. Comp. R. & Regs. 1640-01-17-.05, 2014).

TTS is coded as a first-come, first-serve program because "awards are very competitive and are based on limited funding" (Tennessee Teaching Scholars Program, 2020). Renewal applicants are given first priority. Applicants seeking initial licensure are considered.

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Appendix B: List of TN State Aid Programs Excluded from Data Collection

Voluntary Buyout Program - Tuition Assistance Benefit

"Tuition assistance of up to $15,600 ($7,800 per year) at the schools, institutions, and entities governed by the Tennessee Board of Regents and the University of Tennessee Board of trustees, as well as certified apprenticeship programs. Tuition assistance benefits are available for a two-year period beginning when an employee is separated due to the voluntary buyout program. GED classes are also available through the Tennessee Department of Labor and Workforce Development's Career Centers, and testing fees will be covered under the tuition assistance benefit. This program is not offered to the general public, but only as one of the benefits provided to State employees who are impacted by the Voluntary Buyout Program" (Voluntary Buyout Program - Tuition Assistance Benefit, 2022). The program is active for FY23.

Reduction in Force Tuition Assistance Benefit

"Tuition assistance of up to $11,600 ($5,800 per year) at the schools, institutions, and entities governed by the Tennessee Board of Regents and the University of Tennessee Board of Trustees, as well as state certified apprenticeship programs. Tuition assistance benefits are available for a two-year period beginning when an employee is separated due to a reduction in force. GED classes are also available through the Tennessee Department of Labor and Workforce Development's Career Centers, and testing fees will be covered under the tuition assistance benefit. This program is not offered to the general public, but only as one of the benefits provided to State employees who are impacted by the Reduction in Force" (Reduction in Force Tuition Assistance Benefit, 2022). The program is active for FY23.

John R. Justice Student Loan Repayment Program

"Congress enacted the John R. Justice Prosecutors and Defenders Incentive Act (42 U.S.C. 3797cc-21) to encourage qualified attorneys to choose careers as prosecutors and public defenders and to continue that service. The program provides loan repayment assistance for local, state, and federal public defenders and local and state prosecutors who commit to continued employment as public defenders and prosecutors for at least three years. The Bureau of Justice Assistance awarded federal funds to all fifty states and the District of Columbia to serve eligible recipients working within their respective jurisdiction" (John R. Justice Student Loan Repayment Program, 2013). The program operated in Tennessee during academic years 2012-2014.

Dependent Children Scholarship Program

"The Dependent Children Scholarship Program provides aid for Tennessee residents who are dependent children of a Tennessee law enforcement officer, foreman, or an emergency medical service technician who has been killed or totally and permanently disabled while performing duties within the scope of such employment. The parent must be a Tennessee resident and have been on duty when the incident occurred. The scholarship is awarded to full-time undergraduate students attending eligible Tennessee institutions" (Dependent Children Scholarship Program, 2022). The program is active for FY23.

Helping Heroes Grant

"The Helping Heroes Grant is established and funded from the net proceeds of the state lottery and awarded to U.S. veterans who were honorably discharged or who are a former or current member of a reserved or TN National Guard unit" (Helping Heroes Grant, 2022). The program is active for FY23.

Tennessee HOPE Foster Child Tuition Grant

The Foster Child Tuition Grant is established and funded from the net proceeds of the state lottery and awarded to students who were in custody of the Department of Children Services for at least one (1) year after reaching age thirteen (13) (Tennessee HOPE Foster Child Tuition Grant, 2022). The program is active for FY23.

Middle College Scholarship

"Begun in the Fall 2018 semester, the Middle College Scholarship is established and funded from the proceeds of the state lottery and awarded to high school juniors and seniors enrolled full-time at an eligible postsecondary institution" (Middle College Scholarship, 2022). The program is active for FY23.

TSAC-Byrd Scholarship Program

"The TSAC-Byrd Scholarship program, formerly the Robert C. Byrd Honors Scholarship Program was intended to promote student excellence and achievement, and to recognize exceptional students who show promise of continued excellence… TSAC was notified that funding for this program was eliminated from the federal budget. Therefore TSAC [was] unable to offer new awards to students starting with the 2011-2012 academic year" (TSAC-Byrd Scholarship Program, 2011).

Dual Enrollment Grant

The Dual Enrollment Grant is established and funded from the net proceeds of the state lottery and "awarded to students who are attending an eligible high school and who are also enrolled in college

courses at eligible postsecondary institutions for which they will receive college credit" (Dual Enrollment Grant, 2022). The program is active for FY23.

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Appendix C. Random effects regression results for weighted administrative burden index

Targeted population	Weighted administrative burden index	List of program(s) targeted toward specific population
Students with financial need	-6.672+ (3.693)	Student Assistance Award (n=1)
Racially minoritized students	7.754* (3.927)	Minority Teacher Fellows (n=1)
Only students at technical and community colleges	-5.181* (2.514)	Community College Reconnect, TCAT Reconnect, Wilder-Naifeh Technical Skills Grant (n=3)
Includes students at technical and community colleges	3.764 (2.999)	Aspire, Community College Reconnect, General Assembly Merit, TCAT Reconnect, Wilder-Naifeh Technical Skills Grant, Graduate Nursing Loan Forgiveness, HOPE, HOPE Access, Minority Teaching Fellows, McAuliffe Scholarship, Ned McWherter Scholarship, Promise, MST Loan Forgiveness, Reconnect, Rural Health Loan Forgiveness, Student Assistance Award, Teaching Scholars (n=17)
Students meeting specific academic thresholds	5.413** (1.706)	General Assembly Merit, HOPE, Minority Teaching Fellows, McAuliffe Scholarship, Ned McWherter Scholarship, Teaching Scholars (n=6)
Only students at four-year universities	-3.764 (2.999)	HOPE Non-traditional, STEP UP (n=2)
Includes students at four-year universities	5.181* (2.514)	HOPE Non-traditional, STEP UP, Aspire, General Assembly Merit, Graduate Nursing Loan Forgiveness, HOPE, HOPE Access, Minority Teaching Scholars, McAuliffe Scholarship, Ned McWherter Scholarship, Promise, MST Loan Forgiveness, Reconnect, Rural Health Loan Forgiveness, Students Assistance Award, Teaching Scholars (n=16)
Number of programs	**169**	

Notes. Results come from separate random effects regression models in which programs are coded as 1 if they are targeted toward the specific population of students and all other state aid programs in Tennessee are coded as 0 (referent group). All models control for the average aid award (logged) and year fixed effects. The outcome is the level of weighted administrative burden in a given program in a given year. To weight the administrative burden index, we applied a double weight to program features that required sustained effort. These included: an institution restriction, an incarcerated student restriction, an undocumented student restriction, a residency restriction, a need restriction, enrollment within a specified time after high school graduation, a high school curriculum requirement, an academic requirement, an additional academic requirement, a pledge or promissory note requirement, live in state after award requirement, loan repayment requirement, drug test reporting, criminal history reporting, code of conduct requirement, full-time enrollment, field of study restriction, and continuous enrollment restriction.

+ p<.10 * p<.05, ** p<.01

Appendix D. Weighted administrative burden index for state aid programs in Tennessee in 2021
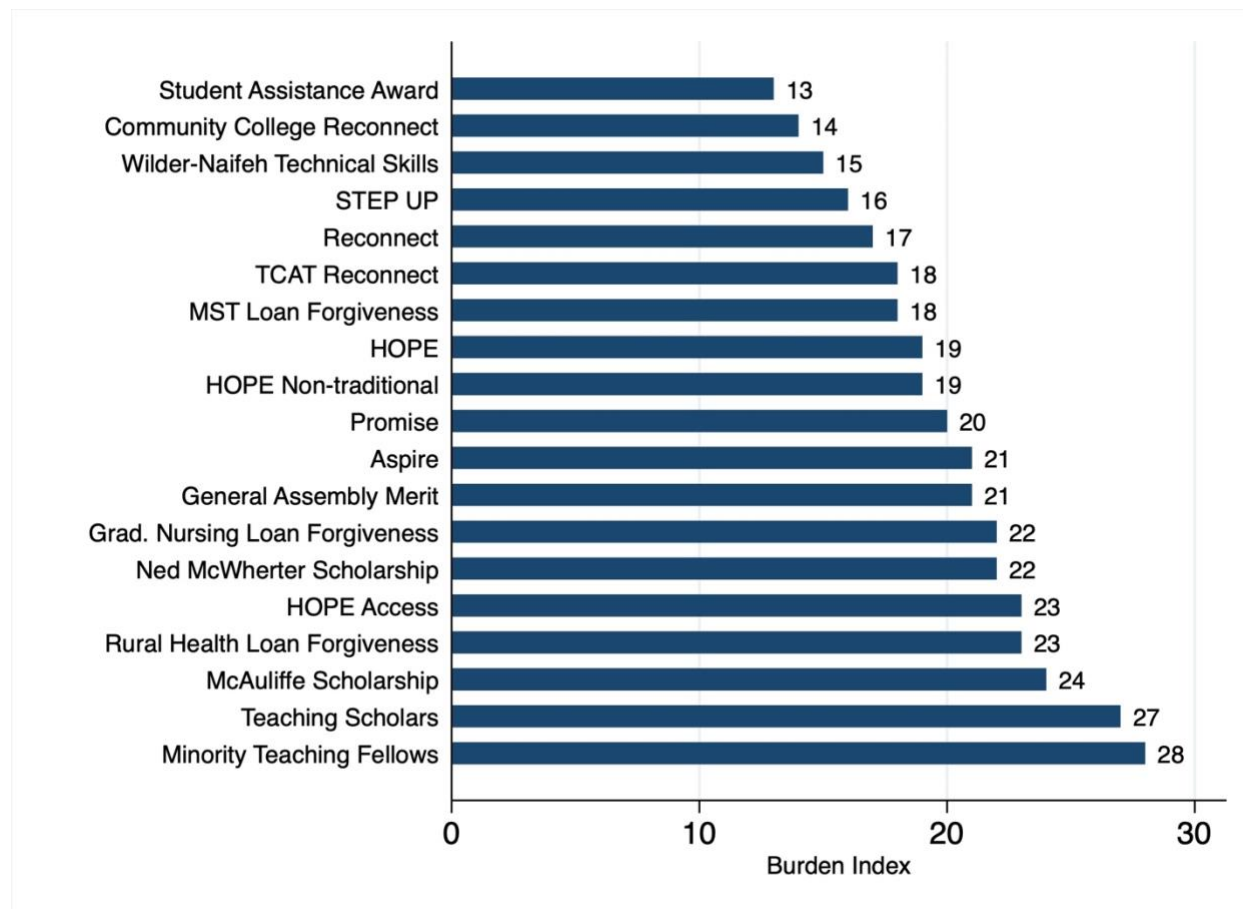
Notes. For programs that were discontinued prior to 2021, we used the most recent year the program was active. These programs were Community College Reconnect (2018), Rural Health Loan Forgiveness (2013), and the McAuliffe Scholarship (2020). To weight the administrative burden index, we applied a double weight to program features that required sustained effort. These included: an institution restriction, an incarcerated student restriction, an undocumented student restriction, a residency restriction, a need restriction, enrollment within a specified time after high school graduation, a high school curriculum requirement, an academic requirement, an additional academic requirement, a pledge or promissory note requirement, live in state after award requirement, loan repayment requirement, drug test reporting, criminal history reporting, code of conduct requirement, full-time enrollment, field of study restriction, and continuous enrollment restriction.