Every year millions of students seeking access to federal financial aid complete the Free Application for Federal Student Aid (FAFSA) application which grants an estimated $234 billion in federal aid in the 2020-21 academic year. Upon receiving students’ FAFSA, the U.S. Department of Education selects some students for income verification, a process in which educational institutions check the accuracy of the information students filled out on the FAFSA. I conducted semi-structured interviews with 17 Latinx community college students to identify barriers in the verification process. Using Critical Race Theory, I contend the verification process reflects and upholds institutional racism within the financial aid process through three barriers. Latinx students experience concern and confusion upon receiving notification of verification selection, difficulty locating requested documentation and acquiring parents’ signature, and undergo a lengthy review of their verification forms which delays receipt of their financial aid.
Latinx Community College Students Experiencing Financial Aid Income Verification: A Critical Race Analysis

Abstract

Every year millions of students seeking access to federal financial aid complete the Free Application for Federal Student Aid (FAFSA) application which grants an estimated $234 billion in federal aid in the 2020-21 academic year. Upon receiving students’ FAFSA, the U.S. Department of Education selects some students for income verification, a process in which educational institutions check the accuracy of the information students filled out on the FAFSA. I conducted semi-structured interviews with 17 Latinx community college students to identify barriers in the verification process. Using Critical Race Theory, I contend the verification process reflects and upholds institutional racism within the financial aid process through three barriers. Latinx students experience concern and confusion upon receiving notification of verification selection, difficulty locating requested documentation and acquiring parents’ signature, and undergo a lengthy review of their verification forms which delays receipt of their financial aid.

Key Words: Latinx Students, Financial Aid, Critical Race Theory, Qualitative Methods
Introduction

A misconception exists that the financial aid process ends once a student submits the FAFSA application. However, the reality is that some students will be selected for verification, a process that the U.S. Department of Education uses to confirm the accuracy of the information that students provide on their application (Federal Student Aid, n.d.). Students selected for verification must overcome additional hurdles in order to complete the verification requirements. The Department of Education selects students for verification and requires institutions to confirm the accuracy of students’ information reported on the FAFSA. Often, this information can include personal income, parents’ income, household size, and agreeing to terms and conditions. Students complete the verification process by submitting all required documentation to a college or university financial aid office for review. Once the financial aid office staff approves the students’ application, the financial aid award is disbursed to the students.

Though this process seems relatively straightforward, researchers have found that the financial aid process is not easy for students to complete (Bettinger et al., 2012; Campbell et al., 2015; Dynarski & Scott-Clayton, 2013; Page & Scott-Clayton, 2016). For example, a student may have to go through the verification process multiple times (Hoover, 2017). Also, a student will be delayed if they submit the incorrect documents or fill out verification forms incorrectly (Graves, 2019). In recent years through advocacy and reform efforts by organizations and educational institutions, the Department of Education has reduced the verification rate through implementing data sharing agreements with the Department of Treasury to gain direct tax information for students, using students and families prior tax year information instead of the current year, and allowing usage of unofficial tax transcripts. Though there has been a reduction
in verification rates nationally, “students with the greatest need and fewest resources” (Hoover, 2020), will still experience the greatest impact.

In the 2020-21 aid cycle alone, 17% of federal financial aid applicants, or 2.1 million, were selected for verification, which is a sharp decline compared to 27% of applicants selected in 2018-19 (NCAN, 2021). Furthermore, the 2020-21 aid cycle revealed that about 88% of Pell Grant eligible students were selected for verification (NCAN, 2021). While not a direct measure of socioeconomic status, Pell Grant eligible students are more likely to be low and middle income students of color. In 2015-16, 31.5 percent of white undergraduates received a Pell grant compared to 46.9 percent of Hispanic undergraduates (NCES, 2019).

To subject students who have a demonstrated financial need through such a laborious verification process is unreasonable and may result in a student not completing the verification process or experiencing ‘verification melt’ (NCAN, 2018). Once a student stops-out, they are not eligible to receive additional or subsequent federal aid, which may influence students’ enrollment, persistence, and ultimately, college completion. Though Latinx enrollment rate growth is expected to surpass any other ethnicity group (HACU, 2021), this population still lags behind their peers in degree completion rates (NCES, 2019). The discourse around the financial aid process has predominantly revolved around race neutral perspectives. What has been lacking from the discussion of verification is a critical race exploration about the disproportionate impact that students of color face that ultimately impede their receipt of financial aid. Racism has been void from the scholarly inquiry about verification because the FAFSA application does not have a race or ethnicity question, which requires researchers to utilize institution held data to confirm the race of those selected for verification.
In this study I offer two contributions to the scholarship about verification. My first contribution is an analysis of verification literature applying a CRT framework to contextualize the verification process as a racialized process that intersects racism and classism which disproportionately harms students of color. My second contribution is the uncovering of the extent to which income verification can be a laborious process for students seeking their financial aid through a case study of Latinx students selected for verification.

The findings from this study are organized into three themes that encompass the experience of community college Latinx students experiencing verification. The first theme uncovers how Latinx feel confused and concerned when they receive notification about having been selected for verification. The second theme names and describes the hurdle of locating requested documents for verification and gathering parents’ signatures on the dependent verification form. The third theme reveals how the financial aid offices review of students verification forms delays their receipt of financial aid award disbursement.

**Literature Review**

Scholars have long agreed that verification poses a significant barrier to students’ financial aid process (Davidson, 2013, 2015; Eichelberger et al., 2017; MacCallum, 2008; Page et al., 2020), especially for students of color (Lee et al., 2021). Prior reporting and research about verification have found that few students, if any, who are selected for verification have to make corrections to their financial aid applications leaving expected award amounts mostly unchanged (Hoover, 2017; Kreighbaum, 2019; NASFAA, 2018; Smith, 2018). In a survey of its membership, the National Association of Student Financial Aid Administrators (2018) found that, on average, 84% of applicants selected for verification did not experience a change to their Pell grant award.
Empirical studies examining verification have confirmed who is more likely to be selected for verification, historically lower resourced, first-generation students of color. Two in five FAFSA filers were flagged for verification, and those selected were more likely to be low-income (Page et al., 2019). Utilizing data from Tennessee, Lee and colleagues (2021) find that students who were selected for verification are more likely to be female, Black, or first-generation in college. Additionally, students selected for verification were less likely to enroll in higher education the fall immediately following high school graduation, and that students who filed the FAFSA in later months were less likely to attend college (Lee et al., 2021). Though their findings are based on one state, they demonstrate inequities that exist for students selected for income verification. From an institutional standpoint, Guzman-Alvarez and Page (2021) find that public higher education institutions experience a ‘disproportionate burden’ due to the costs of conducting income verification. Of note, these institutions historically have served large portions of Latinx students and several have been classified as Hispanic Serving Institutions or HSIs (Guzman-Alvarez & Page, 2021).

Community college students face high living costs, which can be more expensive than tuition and fees (Goldrick-Rab, 2016). Additionally, community colleges spend the most money conducting verification (Guzman-Alvarez & Page, 2021), the sector that disproportionately serves low-income and students of color (Edgecombe, 2019). An estimated 22 percent of community college’s financial aid office budget is used towards verification (Guzman-Alvarez & Page, 2021). Scholars studying financial aid in the community college context find that students in the sector were at most risk to suffer from the difficulties of complex financial aid requirements (Campbell et al., 2014). Campbell and colleagues (2014) argue that a “climate of penalty” (p. 68) exists for community college students with unmet needs, which is levied by the
federal government and individual institutions' policies (e.g., verification policies). Such a penalty can be seen in Martorell and Friedmann’s (2018) study in which they found that in one semester community college students who were eligible for Pell Grants forwent approximately $130 million in financial aid, which they name the verification process as one of the leading causes.

Scholars have linked inequitable outcomes with those selected for verification and their race (Lee et al., 2021). Black and Latinx students are overrepresented and targeted by verification policies (Douglas-Gabriel, 2021). The previous studies fall into a trend in educational research where race is a finding, but scholars negate racism as a root cause for the inequities (Harper, 2012). CRT recognizes the prevalence of racism in American society and how it is embedded in organizations, policies, and practices that inflict the lived experiences of people of color (Delgado & Stefancic, 2017; Ladson-Billings & Tate, 1995), and verification is not immune to this fact.

The work that my colleagues have provided advances the knowledge about how verification impacts students and institutions. However, researchers have yet to examine verification within a CRT framework, which negates the embedded structures of racism that informs and upholds the process.

**Theoretical Framework**

**Critical Race Theory**

CRT is born from critical legal studies and primarily used to examine and influence the nexus of race, racism, and power (Bell, 1995; Delgado & Stefancic, 2001). CRT recognizes that racism is real and embedded in society (Delgado & Stefancic, 2017; Ladson-Billings & Tate, 1995). Five tenets inform CRT in education: 1) Centrality and intersectionality of race and
racism; 2) Challenge to dominant ideology; 3) Commitment to social justice; 4) Centrality of experiential knowledge; and 5) Interdisciplinary perspective (Solorzano, 1998). Thus, the purpose of CRT is to eliminate racism and its impacts on class, gender, sexual orientation, and national origin (Delgado & Stefancic, 2017; Ladson-Billings & Tate, 1995; Solorzano, 1997).

Applying a critical race perspective to the study of financial aid is not a novel concept. Two prior studies utilizing a critical race lense to the study of financial aid inform the theoretical underpinning for this study. White & Dache (2019) argue that racism exists and influences financial aid at both the individual (e.g., students and staff) and the institutional (e.g., financial aid policies). Similarly, Hypolite and Tichavakunda (2019) find that Black students attending Historically White Institutions viewed receiving financial aid as a racial stereotype and that they experienced microaggressions such as the misconception that all Black students receive financial aid to pay for college.

Specifically applying a CRT framework to this study, CRT recognizes that students of color being more likely to be selected for verification and not completing verification requirements is rooted in racist barriers to stop out or disadvantage students of color seeking higher education. Verification is a mechanism a part of a larger list of barriers that inhibits inequitable outcomes (i.e. enrollment, persistence, and completion rates) experienced by students of color and other minoritized backgrounds in higher education. Mckinnon-Crowley (2022) classifies the rise of verification in the ‘Reganite Normal’ period of the history of financial aid. Verification did not become actual language in regulation in the Higher Education Act until late early 1980s. According to a historical account of NASFAA, the Department of Education increased verification (known as validation at the time) during the Regan administration (Brooks, 2015). NASFAA addressed the intentions of the Administration via a newsletter,
“Given the consistency with which delays seem to be occurring, one must begin to wonder if they are not part of a deliberate attempt to discourage students in the hopes of saving money that has been appropriated to help them attend postsecondary institutions” (Brooks, 2015, p. 40).

There is a recognition that the ramping up of verification that took place during the Regan administration, and the delays it caused students. The increase of verification happened to coincide with when Black, Indigenous, and Hispanic student enrollment numbers peaked in the early 1980s (Deskins, 1991). Given the theoretical underpinning for this study, I recognize that the race of the students who were subjected to the increased regulatory practices is not by chance, but rather is by design.

In this paper, I utilize CRT and stories of Latinx students selected for verification to challenge the notion that verification is race neutral, as studies previously mentioned continue to find that students of color are being selected for income verification disproportionately.

**Methods**

In this study, I employ a qualitative case study to make sense of Latinx students’ experiences in the financial aid verification process. I seek to answer the following research question: How do Latinx community college students experience financial aid income verification policies and practices? Case study research is a predominantly qualitative technique in which a bounded system or case is studied at length in their real-life context (Yin, 2017). The interviews were conducted with community college students that had been selected for financial aid verification. I chose interviews for this study to capture the “…lived experience of other people and the meaning they make of that experience” (Seidman, 2013, p. 9).
This study's data is from a wider study that explored students' and staff's verification experiences at one community college in California. In this paper, I will focus exclusively on student interviews. The interviews were conducted using a semi-structured format (Maxwell, 2013), because the questions were specific to financial aid verification and allowed for the flexibility to gather individual participants’ experiences. The interviews focused on the participants’ educational history, experiences with financial aid, experiences within the verification process, experiences with financial aid institutions and actors, and recommendations to improve the verification process.

Throughout data collection, I took copious field notes about my experiences with the participants and being at the study site. The field notes helped to recall specific challenges and areas of inquiry during the data collection process. Additionally, I wrote reflections after each of the interviews. While analyzing the interview data, I used analytic memos to track specific codes for the analysis.

**Study Site**

The site selected for this study was Streamline College (a pseudonym), a community college comprising one of the 116 individual colleges of the California Community College system. Streamline College was chosen because of its student financial aid demographics and racial demographics. The college is a recognized HSI and enrolls approximately 20,000 students, with a 77% Latinx enrollment. Of note, the college’s Financial Aid Office’s data shows that 84% of students selected for verification at the college identify as Latinx. Approximately 6% of the students are white, 6% Asian, and 2% African American or Black. According to the California Community Colleges Chancellor’s Office Management Information Systems Data Mart, approximately 26% of students receive the Pell grant in the 2018-19 academic year. As stated
earlier, based on institutional data from Streamline college, an alarming 73% of students selected for verification do not complete the verification process, meaning that students lose out on millions in federal, state, and even institutional aid.

**Sample and Recruitment**

The sample consisted of 17 Latinx student participants who attended Streamline College and were selected for financial aid verification. Each participant identifies as Latinx and a first-generation student. Additionally, each student had applied for financial aid and had received or expected to receive some form of need-based aid. The interviews were conducted on campus in the Spring semester of 2019. For the interviews, participants were recruited using purposeful and snowball sampling (Maxwell, 2013). Purposeful sampling was conducted by sending out emails to students that had been selected for verification. Based on institutional data from the college, the financial aid office identified all students selected for verification, sent emails to each of the students consisting of information about the study, and instructed students on how to sign up for interviews if they were interested in participating in the study. Snowball sampling was conducted by allowing the interview participants to recommend fellow students they knew had been selected for verification. The purpose of interviewing participants was to gather direct insight into what students at Streamline College experienced in the financial aid verification process. I emailed all students that responded to the financial aid office’s email with additional information about the study and asked if they would be willing to participate in an interview for approximately sixty minutes. Students who participated in the interview received a $20 Amazon gift card. The following table provides the demographic information for each student participant based on the demographic sheets they filled out before the interview.
Table 1 Student Interview Participants Demographic Sheet Information

<table>
<thead>
<tr>
<th>Pseudonym</th>
<th>Age</th>
<th>Gender</th>
<th>Ethnicity/Race</th>
<th>Major</th>
<th>Years Attended</th>
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<td>Hispanic</td>
<td>Film/CIT</td>
<td>No Response</td>
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<tr>
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<td>Male</td>
<td>Mexican American</td>
<td>History</td>
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<tr>
<td>Ethan</td>
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<td>Male</td>
<td>Hispanic</td>
<td>Japanese</td>
<td>2</td>
</tr>
<tr>
<td>Melissa</td>
<td>19</td>
<td>Female</td>
<td>Hispanic</td>
<td>Biology</td>
<td>1</td>
</tr>
<tr>
<td>Kiara</td>
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<td>Female</td>
<td>Hispanic</td>
<td>Ultrasound Tech.</td>
<td>1</td>
</tr>
<tr>
<td>Martin</td>
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<td>Male</td>
<td>Latino</td>
<td>Criminal Justice</td>
<td>2</td>
</tr>
<tr>
<td>Kim</td>
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<td>Hispanic</td>
<td>Political Science</td>
<td>1</td>
</tr>
<tr>
<td>Raymond</td>
<td>18</td>
<td>Male</td>
<td>Mexican American</td>
<td>Nursing</td>
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<tr>
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<td>Male</td>
<td>Hispanic</td>
<td>Theater Arts</td>
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<tr>
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<tr>
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<td>Nursing</td>
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<tr>
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<tr>
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<td>Hispanic</td>
<td>Administration of Justice</td>
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<tr>
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<tr>
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<td>Computer Science &amp; Business Economics</td>
<td>3.5</td>
</tr>
</tbody>
</table>

Analysis

The interview transcriptions were analyzed using Dedoose, a qualitative coding software. Concept coding was used for the first round of coding. Concept coding is a coding style that identifies words or phrases that represent a broader meaning (Saldaña, 2016). This coding style is appropriate for this study because it helps connect what the participants share to the broader context of the verification process that the participants would most likely not identify precisely. For example, when participants discuss their experiences with the verification process, they may not realize that the knowledge they are describing are barriers or laborious tasks that impede
their ability to access aid. The analytical approach connects directly with the application of CRT with the study to identify how verification policies and practices are upholding institutional racism in the participants’ experiences. Each interview transcription was transcribed separately with similar codes grouped. After the first cycle of coding, I used axial coding for the second cycle of coding. This type of coding helped me determine the dominant codes in the analysis in order to formulate a list of themes supported by each code (Saldaña, 2016).

**Positionality**

My role as a researcher is informed by my own experience as a first-generation student of color who needed financial aid to access my higher education. I remember having to go through verification during my first year of college and not understanding the process, why I had to submit additional information to the financial aid office, and upon review, not understanding why my financial aid package changed. I also enter into my work as someone who served as a member on a state commission tasked with administering state financial aid programs. In this role, I tracked decreasing take-up rates, when students do not receive the financial aid they're eligible for, and learned how verification is a cause. When working with this research site, I built relationships with financial aid staff and students, trying to understand the institution and how it operated. My personal and policy experiences and my time spent on the study site, inform my positionality.

**Findings**

Latinx students explained how they navigated the verification process: accessing verification forms, locating necessary documents needed to complete verification, and going back-and-forth with the financial aid office to complete the process successfully. The findings show an excessively bureaucratic process that students must adhere to complete verification. The
results provide insight into how Latinx students navigate and make sense of institutional verification policies and process.

**Experiencing Confusion & Concern About Notification of Verification**

Most of the participants were not deterred by the verification process. However, many of them expressed confusion and frustration at having to go through receiving their financial aid. For most of the students, they submitted their FAFSA months before the academic year started and were alarmed to be notified that they had to go through verification. Kim, a Hispanic second-year political science major, is one such student who was shocked to find out that she had to go through verification:

I was confused because I thought everything was in order because, like I said, I did it in high school, and they said it was fine. And then I think they have a summer bridge program here, so they revise everything to make sure that you have it and they said it was fine, so I was like, “What possibly could be wrong?”

Even after having her FAFSA completed while she was still in high school and having it double-checked during a summer program offered by Streamline College, Kim was yet selected for verification. Upon being notified about being selected for verification, Kim, like most students, figured it meant something was wrong with her FAFSA.

To complete verification at Streamline, students must complete the financial aid office’s internal verification form titled “Verification Worksheet”. The dependent verification worksheet is more extended because the worksheet requests the students’ individual tax information in addition to their parents’ information. Similar to Kim, David, a Mexican American second-year history major, shared his confusion with having to submit the verification form:
It was really just who lives in your house. Write their names. And yeah, I think that was it, actually. Your name, where you live. It was honestly stuff they could’ve pulled from my FAFSA, so that’s where I was like, “Why am I doing this again?” But yeah, it was stuff that they could’ve pulled from my FAFSA, so I don’t know.

David questioned the redundancy of having to submit the information that was already required in the FAFSA. This redundancy led many participants to ask why they even had to provide this information and go through verification. At one point during the process of turning in his documents for verification, David thought he had done something wrong with his financial aid:

Yeah. I thought they weren’t gonna give me financial aid because of my first time doing it, and so my very first semester here, they said to fill it out. I’m like, “Oh, my gosh. What happened? Like, what, did I do it wrong?” Like, I was freaking out at first. But then I took it home, and my mom was like, “Okay, well, let’s just fill it out. Turn it in, see what happens.” I’m like, “Okay.”

David’s experience exemplifies how, though students were initially alarmed by the notification about being selected for verification; they followed the directions to fill out the forms and provide the necessary documentation to the financial aid office. The students’ actions are thought-provoking given that data provided by the financial aid office found that 73% of students selected for verification at Streamline College do not complete verification. All the participants interviewed for this study had completed or were in the process of completing verification.

**Experiencing Hurdles: Findings Documents & Gathering Parent’s Signature**

The most challenging task that students experienced with verification was compiling the documents that needed to be submitted to the financial aid office. Documents that were requested from the participants included tax transcripts, W-2s, and birth certificates. Financial aid
verification can be delayed longer if the student submits the incorrect documents or fills out any forms incorrectly (Graves, 2019). Miguel, a Mexican American, fourth-year Computer Science and Business major, repeatedly visited the financial aid office to clarify that he had the correct documents and forms:

So it was definitely more of a “I know what I need, I just don’t know what it is exactly and how to get it.” . . . I had to come back and a back-and-forth thing. Whereas, “Okay, I have this, now what do I need to do? Okay, is this the correct document that I would need? Is there someone that can help me fill it out? Or what do I need to fill out on certain things like that?” So my first time around, it definitely took a lot longer than it should have or that it had to because of the fact that I was confused, and then it wasn’t as helpful, I guess you could say.

Miguel describes the confusion he experienced during the first time that he was selected for verification. The difficulty he encountered with the process centered around determining if he had the correct forms or getting the proper documents to complete verification. One point that he makes is asking the financial aid office if there is any person that could help him fill out the verification forms. Because of the back-and-forth that Miguel had to do with the financial aid office, it took him a long time to complete verification.

Students had to navigate working with their parents and external entities to retrieve the documents. Several participants shared having to contact the United States Internal Revenue Service or their tax preparers to track down copies of their documents. Jessica, a fifth-year English major who identifies as Mexican, shared that she had to contact her parents’ tax preparer to locate their W-2s:
At first, it’s like, and it’s kind of funny because it would be a thing. Around the same time, it would be like, “Mom, where’s your tax folder?” And she’d be like, “Okay, it’s over here.” And I’d be, “Okay, what do the W-2s look like again?” And I would look, I would scan every page because I didn’t want to bother her. I would be like, “Mom, I can’t find them.” She’d be [like], “What do you mean you can’t find them?” “They’re not here!” And then it’d just be a hassle of next step, call the taxman. Not answering. Secretary’s not answering. And then finally, when he would get back to us, he could have trouble finding them himself on his own system. I don’t know if it was just by coincidence, just our file or whatever, but now we kind of superglue those W-2s to the folder whenever we get them now.

In this example, Jessica not only had trouble, but her tax preparer also had difficulties locating the documents. Finding these additional documents can delay how quickly a student can return their information to the financial aid office to be verified.

As a reminder, after students locate the forms and submit them to the financial aid office, they are informed by the staff that it can take up to eight to ten weeks to review the requested documents (e.g. tax transcripts, W2s, pay stubs, etc.). This review period does not consider whether students have made a mistake on the college’s verification form or submitted incorrect documents, meaning that students could have to wait for an additional two to three months for the resubmitted documents to be reviewed.

Ignacio, a third-year theater arts major, who identifies as Hispanic, expressed his frustration with verification after waiting two months, only to be told that the documentation he submitted was incorrect. As a result, he had to retrieve the correct forms and wait again:
I remember when that first happened. In the beginning of the semester, they were telling me it’s just wrong forms, and the dependent verification wasn’t going through. It wasn’t processing. So when that happened, I come in . . . When that happened eight to ten weeks later, and I come in, and they tell me, you have to wait eight to ten weeks for things to get reviewed and confirmed. And then they tell me that it’s not the forms, it’s the 1098 form. It kind of made me mad. I’m like, “It took you guys eight to ten weeks to find out it’s not the forms you guys been begging me to come in personally and give you or hit up the IRS for the certain transcripts. It’s not even those that you needed. It was something else that I could have just gone on the computer for.” I don’t know. That’s what made me mad.

Ignacio had contacted the IRS by phone and in-person to get tax forms that he thought were needed to complete verification. After the financial aid office review, he learned that he could have accessed the correct form via the internet. Though this was an easy fix, he was upset that it took the financial aid office so long to inform him that he needed different documents. Because of this, Ignacio was not expecting to receive his first disbursement until the end of March, two months before the academic year was over.

Another hurdle in the verification process was the parent signature requirement on the college’s verification form for dependent students. Several students shared needing to work with their parents to find the documents and wait for their schedules to align to get their signature. Miguel was one of the students who was waiting to find a mutual time for him and his mother to complete the verification form:

…We would forget on the weekends to do it, and then yeah, we just forget because we wouldn’t see each other during the weekdays. It was always the weekend we would see each other, but like, she’s doing stuff on the weekends, or I was doing stuff… I ended up
telling her a few days later and then she’d be like, “Oh, okay,” but she was actually the one reminding me, so it would be like the next week and be like, “Mijo, don’t forget, we still have to do that.”

In this example, Miguel’s mother reminded him that they needed to complete the verification forms. Because the two did not see each other throughout the week, Miguel would forget to find time to work on the form. The verification forms require parents’ financial information and signature, so without meeting with his mother, Miguel is delayed with submitting the form to the financial aid office.

Overall, students’ experience with the verification process centers around navigating a complicated process to complete a worksheet required to submit to the financial aid office. Students needed to gather external stakeholders' documents, such as the IRS and parent’s tax information, to complete these forms. Complying with verification connects to regulating the poor by way of students with financial need having to comply with strict requirements to get their aid. From a critical race perspective, the regulations are oppressive barriers for students. Furthermore, because students have a constant reminder of completing verification, the students still having to complete verification show how the confusion, frustration, going back and forth with the financial aid office reflects microaggressions. The over-regulation of the bureaucratic process and the racist structures do not end with students completing verification. Because of the time it takes for students to complete this part of verification, a domino effect further delays them to receive their financial aid.

**Verification Review Delays Students’ Financial Aid Disbursements**

Students whose financial aid applications are approved after the college’s initial regular and makeup financial aid disbursement dates rely on other resources to support their educational
costs. Many relied on their parents to lend them money and later paid them back once they received their disbursement. Students shared that they borrowed approximately $200 to pay for school supplies, books, or food and transportation costs for school because they were waiting for aid. Fortunately, all participants received support from their parents, but some students did not like the idea that they had to borrow from their parents. The following students shared their experiences of asking their parents for money. Jorge, a Latino second-year fire technology major, explained:

I had late disbursements last semester. I had to borrow money from my mother because I didn’t have it for three months. I didn't get it until three months later, and I had already paid everything off.

David discussed how he is fortunate for his mothers’ financial assistance while he waits for his financial aid:

I’m very fortunate because I’m able to tell my mom, “Hey, I get my disbursement in a week. Please help me out, and I’ll pay you back.” So I’m very lucky to have that. I acknowledge it. I’m not ‘gonna shy away from that. Like, yeah, my mom helps me out in that. And in the moment, at least. Like I owe her the money, of course. But yeah, so I’m very fortunate for that.

The participants were fortunate to have parents who supported them while they waited for their financial aid disbursement. Though students could come up with short-term solutions for the issues brought on by the verification process, they still wondered why verification exists and how it can lead to the delay in receiving their financial aid. As I have argued throughout this paper's entirety and will further examine in the subsequent discussion section, the
microaggressions that students experience are informed by institutional and macro level forms of racism.

Discussion

The interviews conducted with Latinx community college students selected for verification provided insight into their experiences and, ultimately, how they navigated the financial aid verification process. The students shared the difficulties they experienced navigating the financial aid verification process: experiencing confusion and concern about verification selection, difficulty completing the verification worksheet and compiling documents and collecting parents signatures, and delay in the receipt of aid due to the lengthy review.

Participants shared their initial confusion about how to go about completing verification. While navigating verification, the students experienced hurdles with completing the financial aid office’s verification forms and locating external documents requested by the financial aid office. Students’ difficulties resulted in their submitting the verification form and supporting documents after the academic year started, which caused delays to when their aid would be disbursed. Because of the delays in disbursements, students had to find financial support elsewhere as they waited for their aid application to be approved and/or disbursed, and experienced portions of the academic year without aid to pay for essential expenses.

The findings from this study connect back to the prior academic literature, and the theoretical approach used to guide this paper. Concerning prior literature, the findings reflect preceding claims made among research about financial aid. The participants in this study experienced a complicated financial aid process, and previous scholars have discussed the complexity of the financial aid process. In their work, Campbell et al. (2015) identify a climate of penalty where “policing of federal financial aid create[s] overwhelming inefficiencies that can
harm the success of students who need [financial] aid the most” (p. 67). Overall, the difficulties students experienced are unsurprising and confirm prior scholarship documenting similar issues with verification (Cochrane, 2010). This study builds on previous findings by identifying the specific complexities that students have to navigate to complete financial aid verification and how they complete it.

CRT recognizes that Latinx community college students are navigating a higher education system based in White Supremacy and reinforced by racism (Patton, 2016). The verification process has been shrouded as a tool to “maintain the integrity” (Douglas-Gabriel & Harden, 2021, p. 2) of the financial aid system, but has overburdened low-income and students of color. In this study, Latinx students are centered to understand how they experience a colleges’ verification policies and processes. Instead of reaping the benefit of financial aid, Latinx students are having to borrow money while they wait for the verification documents to be reviewed. Receiving financial aid is an indicator of persistence and success (John et al., 1991); this being the case, Latinx students delayed by verification policies are disadvantaged to reap the benefits of financial aid. Not only can not having the aid impact the students’ academic trajectories, but this can also have a mental toll as well. As this study finds, the destructive aid policies led many participants like Ignacio, Jorge, and David to be concerned or confused about when they would receive their aid. This disadvantage for students selected for verification is not by happenstance, but a part of a broader systemic process used to penalize low-income students of color.

Limitations

The known limitations for this study center on recruitment. Participants invited to participate for the study had been selected for verification during the academic year when
interviews were conducted. Students can be flagged for verification one year and not the next. Because of this, some students that have gone through verification in the past, but not during that current academic year were not invited to participate in the study. This limits the potential to understand how verification policies and practices change at the institution from year to year. Though this is the case, the findings reflect the lived experiences of Latinx students currently navigating the verification process.

**Recommendations**

The recommendations from this study are aimed at both the institutional context and broader verification requirements set by the U.S. Department of Education. Improvements should be made to how the college informs students about their verification selection status. The participants were concerned upon receiving notification about their being selected for verification and were sometimes late with starting the process. Colleges should utilize multiple avenues to contact students, with the goal of getting the students started with completing the verification requirements as soon as possible to circumvent delays.

The required documentation that colleges request are maintained by guidance from the Department of Education. In this instance, it is up to the Department of Education to take steps to simplify verification completion requirements for students and higher education institutions. In 2019, the Department announced that it would allow colleges and universities to accept students’ and parents’ signed tax returns in place of official tax transcripts. This change can shorten the time it takes for students to complete verification because students will not have to wait to receive tax transcripts from the IRS. Another step that the department took was eliminating verification requirements during the covid-19 pandemic, but have announced plans to reinstate verification selection for the 2022-23 academic year.
Higher education institutions must prioritize decreasing the length of time for verification review. In the case of Streamline college, the review of students’ verification forms delayed financial aid disbursement to participants. The U.S. Department of Education should set a time length that institutions must complete verification of student applications. This will ensure that students receive their money in a timely manner and that institutions are held accountable.

In the broader policy realm, the U.S. Department of Education should require colleges to verify FAFSA applications at the rate at which confirmed financial aid improper payments occur, which, based on the most recent data, is approximately 3% (Cheston, 2013). According to the IRS (Lough, 2020), less than one percent of tax returns for people making 500 thousand or less are audited. Given this fact, an obvious question is why are students selected for verification at such higher rates?

Guidance from the U.S. Department of Education has typically directed colleges to verify all financial aid applications selected for verification up to 30% of the total of aid applicants at the institution (Federal Student Aid Handbook, n.d.). The department has decreased selection to approximately 17 percent of applicants in the 2020-21 cycle (NCAN, 2021). Suppose the U.S. Department of Education was to produce a report confirming that fraud exists at a certain percentage. In that case, colleges should be mandated to verify that percentage of their student body seeking financial aid. With fewer students selected for verification, financial aid staff may provide more significant support to students as they navigate completing the requirements to complete verification.

There are two specific areas of inquiry for future researchers to consider. The first is to explore why students choose to persevere through the verification process. Though this study did not seek to understand why students strive through the financial aid process, there has not been
research that has solely examined student perseverance in the financial aid process. Prior scholars (Bettinger, 2004; Dowd, 2004; Herzog, 2018; Perna, 1998) have investigated the relationship between students who receive financial aid and the likelihood of persisting in college, with varying results. These studies are important to our understanding of the role of financial aid in student persistence, but further examination is needed about students navigating the financial aid process. The second area for future research are studies on the role of parents and guardians in the verification process. In this study students shared that their parents assisted them with the verification form locating requested. The participants were required to have their parents’ or guardians’ signature on the college’ verification form and dependent students are required to show parent and guardian financial information for verification purposes. Though studies have found significance between parent education level and students likelihood to complete verification (Feeny & Heroff, 2013), there have not been studies examining parent role and verification completion.

**Conclusion & Implications**

In this study, I find that low-income Latinx students must navigate a laborious process that requires them to learn about being selected for verification, compile requested documents, and ultimately wait for financial aid office review to approve their application to disburse their financial aid. This study is unique in two ways. First, it illustrates that the verification process delays Latinx students at Streamline College from receiving financial aid, and the depth of the complexities that students face while completing the process. Second, it recognizes that the verification process and its specific barriers are shrouded in a broader racist context that is a detriment for low-income and students of color seeking financial assistance to achieve a higher education. Although these findings can only be generalized to Streamline College, these
experiences are likely happening to other Latinx students across postsecondary institutions, given similar findings in Page et al. (2019) and Lee et al. (2021).

Federal and institutional financial aid policies and processes do not exist in their own void. It is naive to not name the barriers that disproportionately affect students of color in the verification process as examples of racist inequities that impede these students who need financial aid. I implore future researchers to call it for what it is. This study's significance is that federal and institutional policies are barriers for low-income students of color who need financial assistance to access higher education. This study provides an example of how CRT contextualizes and illuminates how financial aid policies uphold the racist norms.

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