



May 7, 2025

Ms. Anne Kato  
State Controller's Office  
Local Government Programs and  
Services Division  
3301 C Street, Suite 740  
Sacramento, CA 95816

Mr. Arthur Palkowitz  
Law Offices of Arthur M. Palkowitz  
12807 Calle de la Siena  
San Diego, CA 92130

*And Parties, Interested Parties, and Interested Persons (See Mailing List)*

**Re: Proposed Statewide Cost Estimate**

*Free Application for Federal Student Aid (FAFSA), 22-TC-05*  
Education Code Section 51225.7, as Added by Statutes 2021, Chapter 144  
(AB 132, Section 10), Effective July 27, 2021  
Fresno Unified School District, Claimant

Dear Ms. Kato and Mr. Palkowitz:

The Proposed Statewide Cost Estimate for the above-captioned matter is enclosed for your review.

**Hearing:** This matter is set for hearing on **Friday, May 23, 2025, in person at 10:00 a.m., at California Department of Food and Agriculture (CDFA), First Floor Auditorium, 1220 N Street, Sacramento, California, 95814 and via Zoom.**

The Commission is committed to ensuring that its public meetings are accessible to the public and that the public has the opportunity to observe the meeting and to participate by providing written and verbal comment on Commission matters whether they are physically appearing at the in-person meeting location or participating via Zoom. If you want to speak during the hearing and you are in-person, please come to the table for the swearing in and to speak when your item is up for hearing. If you are participating via Zoom, you must use the "Raise Hand" feature in order for our moderators to know you need to be unmuted.

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gov.zoom.us/j/88948432031?pwd=gbw1v1Vc6haeBVG9hcVS1aAc95rlt.1](https://csm-ca.gov/zoom.us/j/88948432031?pwd=gbw1v1Vc6haeBVG9hcVS1aAc95rlt.1)

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2. Through your landline, smart mobile, or non-smart mobile phone, either number works. You will be able to listen to the proceedings but will not be able to view the meeting or any documents being shared. If you would like to speak, press #2 to use the "Raise Hand" feature.

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This matter is proposed for the Consent Calendar. Please let us know in advance if you oppose having this item placed on consent and wish to testify at the hearing or have a representative testify on your behalf, and if other witnesses will appear.

**Testimony at the Commission Hearing:** In that case, please notify the Commission Office **not later than noon on the Tuesday prior to the hearing, May 20, 2025.**

Please also include the names of the people who will be speaking for inclusion on the witness list and the names and email addresses of the people who will be speaking both in person and remotely to receive a hearing panelist link in Zoom. When calling or emailing, please identify the item you want to testify on and the entity you represent. The Commission Chairperson reserves the right to impose time limits on presentations as may be necessary to complete the agenda.

**Time to File Written Comments:** If you plan to file any written document, please note that Commission staff will include written comments filed at least 15 days in advance of the hearing in the Commissioners' hearing binders, a copy of which is available for public viewing at the Commission meeting. Additionally, written comments filed more than five days in advance of the meeting shall be included in the Commission's meeting binders, if feasible, or shall be provided to the Commission when the item is called, unless otherwise agreed by the Commission or the executive director. (Cal. Code Regs., tit. 2, § 1181.10(b)(1)(A-B).

However, comments filed less than five days in advance of the meeting, the commenter shall provide 12 copies to Commission staff at the in-person meeting. In the case of participation by teleconference, a PDF copy shall be filed via the Commission's dropbox at <https://www.csm.ca.gov/dropbox.shtml> at least 24 hours prior to the meeting.

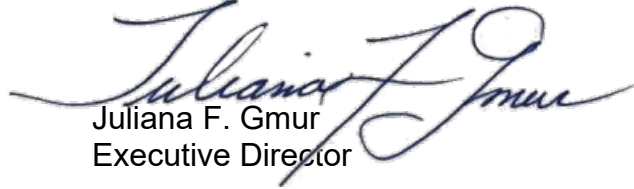
Commission staff shall provide copies of the comments to the Commission and shall place a copy on a table for public review when the item is called or, in the case of participation via teleconference, shall provide an electronic copy to the Commission and post a copy on the Commission's website, and may share the document with the Commission and the public using the "share screen" function. (Cal. Code Regs., tit. 2, § 1181.10(b)(1)(C)).

**Postponement:** If you would like to request postponement of the hearing, please refer to section 1187.9(b) of the Commission's regulations.

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**Special Accommodations:** For any special accommodations such as a sign language interpreter, an assistive listening device, materials in an alternative format, or any other accommodations, please contact the Commission Office at least five to seven *working* days prior to the meeting.

Very truly yours,

A handwritten signature in blue ink, reading "Juliana F. Gmur". The signature is fluid and cursive, with the first name "Juliana" being more prominent and the last name "Gmur" following in a similar style.

Juliana F. Gmur  
Executive Director

**ITEM 4**  
**PROPOSED STATEWIDE COST ESTIMATE**

**\$880,067 - \$8,222,922**

**Initial Claim Period, July 27, 2021 to July 1, 2022 and Fiscal Year 2022-2023**

**\$1,066,886 - \$ 9,098,707**

**Fiscal Year 2023-2024 and Following (Plus the Implicit Price Deflator)**

Education Code Section 51225.7, as Added by Statutes 2021, Chapter 144

(AB 132, Section 10)

*Free Application for Federal Student Aid (FAFSA)*

22-TC-05

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on May 23, 2025 as follows:

<b>Member</b>	<b>Vote</b>
Lee Adams, County Supervisor	
Deborah Gallegos, Representative of the State Controller, Vice Chairperson	
Karen Greene Ross, Public Member	
Renee Nash, School District Board Member	
William Pahland, Representative of the State Treasurer	
Michelle Perrault, Representative of the Director of the Department of Finance, Chairperson	
Matt Read, Representative of the Director of the Office of Land Use and Climate Innovation	

**STAFF ANALYSIS**

**Summary of the Mandate, Eligible Claimants, and Period of Reimbursement**

This Statewide Cost Estimate addresses statewide increased costs arising from Education Code section 51225.7 (Stats. 2021, ch. 144), which requires school districts, including county offices of education, to confirm that each pupil in grade 12 complete at least one of two specified financial aid applications, unless the pupil opts out of the requirement or is deemed exempt by the school district, and to direct pupils in grade 12 to services necessary to assist them in completing the appropriate financial aid application.

On May 24, 2024, the Commission on State Mandates (Commission) adopted a Decision finding that the test claim statute (Ed. Code, § 51225.7, Stats. 2021, ch. 144) imposes a reimbursable state-mandated program on school districts, including county offices of education, within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514. The Commission partially approved this Test Claim for the following reimbursable activities beginning July 27, 2021:

- Commencing with the 2022-23 school year, confirm that a pupil in grade 12 either completes and submits to the United States Department of Education a Free Application for Federal Student Aid (FAFSA); or, if the pupil is exempt from paying nonresident tuition pursuant to Education Code section 68130.5, the pupil completes and submits to the Student Aid Commission a form established pursuant to Education Code section 69508.5 for purposes of the California Dream Act (also known as the California Dream Act Application or CDAA), unless the parent or legal guardian of the pupil, or the pupil if the pupil is a legally emancipated minor or 18 years of age or older, elects to opt out of the requirements of this section by filling out and submitting an opt-out form to the school district or county office of education (Ed. Code, § 51225.7(b)).
- If it is determined that a pupil is unable to complete and submit the FAFSA or CDAA, or an opt-out form, exempt the pupil or, if applicable, the pupil's parent or legal guardian, and complete and submit an opt-out form on the pupil's behalf (Ed. Code, § 51225.7(d)).
- Ensure that each pupil in grade 12 and, if applicable, the pupil's parent or legal guardian, is directed to any support and assistance services necessary to comply with the financial aid application requirement described in Education Code section 51225.7(b) that may be available through outreach programs, including, but not limited to, those programs operated by the Student Aid Commission, postsecondary immigration resource centers, college readiness organizations, community-based organizations, and legal resource organizations (Ed. Code, § 51225.7(e)(1)).<sup>1</sup>

The Commission found that developing and implementing internal policies, training, and procedures, training staff on how to assist pupils in grade 12 with completing and submitting the FAFSA and CDAA, and providing "support and assistance" to pupils in completing the appropriate financial aid application through school counseling sessions and in-person "parent night" workshops are not required by the plain language of Education Code section 51225.7 and are not eligible for reimbursement.<sup>2</sup> The Commission also found that the test claim statute does not require school districts to adopt an acceptable use policy that provides guidance on how to handle pupil and parent data shared under the test claim statute. Therefore, the language in the model acceptable use policy adopted by the California Student Aid Commission (Appendix B) stating that the local educational agency designate an individual responsible for

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<sup>1</sup> Exhibit A, Test Claim Decision, page 38.

<sup>2</sup> Exhibit A, Test Claim Decision, page 27.

implementing and ensuring compliance with the policy, is not a requirement imposed on school districts by the test claim statute or regulation.<sup>3</sup> Furthermore, school districts have a preexisting duty under other state laws to establish written policies and procedures governing access to, and the confidentiality of, all pupil records and are required to designate an individual to oversee the implementation of such policies. Thus, these activities are not eligible for reimbursement.<sup>4</sup> Finally, the Commission found that California Code of Regulations, title 5, section 30035, Appendices A and B, as added by the test claim regulation (Reg. 2022, No. 19), do not impose any requirements on school districts, and therefore do not constitute a reimbursable state-mandated program.<sup>5</sup>

The Commission adopted the Test Claim Decision on May 24, 2024,<sup>6</sup> and the Decision and Parameters and Guidelines on July 26, 2024,<sup>7</sup> approving reimbursement for any "school district" as defined in Government Code section 17519, except for community colleges, that incurs increased costs as a result of this mandate.

The initial reimbursement period is July 27, 2021 to July 1, 2023 and fiscal year 2023-2024. Eligible claimants were required to file initial claims with the State Controller's Office (Controller) by February 27, 2025. Late initial reimbursement claims may be filed until February 27, 2026, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.<sup>8</sup>

### **Reimbursable Activities**

The Commission approved the following reimbursable activities for this program:

- Commencing with the 2022-23 school year, confirm that a pupil in grade 12 either completes and submits to the United States Department of Education a Free Application for Federal Student Aid (FAFSA); or, if the pupil is exempt from paying nonresident tuition pursuant to Education Code section 68130.5, the pupil completes and submits to the Student Aid Commission a form established pursuant to Education Code section 69508.5 for purposes of the California Dream Act (also known as the CDAA), unless the parent or legal guardian of the pupil, or the pupil if the pupil is a legally emancipated minor or 18 years of age or older, elects to opt out of the requirements of this section by filling out and submitting an opt-out form to the school district or county office of education (Ed. Code, § 51225.7(b)).
- If it is determined that a pupil is unable to complete and submit the FAFSA or CDAA, or an opt-out form, exempt the pupil or, if applicable, the pupil's parent or

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<sup>3</sup> Exhibit A, Test Claim Decision, page 25.

<sup>4</sup> Exhibit A, Test Claim Decision, page 25.

<sup>5</sup> Exhibit A, Test Claim Decision, pages 33-34.

<sup>6</sup> Exhibit A, Test Claim Decision.

<sup>7</sup> Exhibit B, Decision and Parameters and Guidelines.

<sup>8</sup> Government Code section 17561(d)(3).

legal guardian, and complete and submit an opt-out form on the pupil's behalf (Ed. Code, § 51225.7(d)).

- Ensure that each pupil in grade 12 and, if applicable, the pupil's parent or legal guardian, is directed to any support and assistance services necessary to comply with the financial aid application requirement described in Education Code section 51225.7(b) that may be available through outreach programs, including, but not limited to, those programs operated by the Student Aid Commission, postsecondary immigration resource centers, college readiness organizations, community-based organizations, and legal resource organizations (Ed. Code, § 51225.7(e)(1)).<sup>9</sup>

### **Offsetting Revenues and Reimbursements**

According to the Parameters and Guidelines:

Any offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds, shall be identified and deducted from any claim submitted for reimbursement.<sup>10</sup>

This is standard boilerplate language. No specific offsetting revenue was identified.

### **Statewide Cost Estimate**

Staff reviewed 50 unaudited reimbursement claims submitted by 26 school districts, as compiled by the Controller. Staff developed the Statewide Cost Estimate based on the assumptions and methodology discussed herein.

**Table 1. Initial Reimbursement Period Cost Estimate**

Commencing with the 2022-23 school year, confirm that a pupil in grade 12 either completes and submits to the United States Department of Education a Free Application for Federal Student Aid (FAFSA); or, if the pupil is exempt from paying nonresident tuition pursuant to Education Code section 68130.5, the pupil completes and submits to the Student Aid Commission a form established pursuant to Education Code section 69508.5 for purposes of the California Dream Act (also known as the CDAA), unless the parent or legal guardian of the pupil, or the pupil if the pupil is a legally emancipated minor or 18 years of age or older, elects to opt out of the requirements of this section	\$674,131 - \$6,784,735
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<sup>9</sup> Exhibit B, Decision and Parameters and Guidelines, pages 8-9.

<sup>10</sup> Exhibit B, Decision and Parameters and Guidelines, page 10.

by filling out and submitting an opt-out form to the school district or county office of education (Ed. Code, § 51225.7(b)).	
If it is determined that a pupil is unable to complete and submit the FAFSA or CDAA, or an opt-out form, exempt the pupil or, if applicable, the pupil's parent or legal guardian, and complete and submit an opt-out form on the pupil's behalf (Ed. Code, § 51225.7(d)).	\$76,743 – \$1,048,728
Ensure that each pupil in grade 12 and, if applicable, the pupil's parent or legal guardian, is directed to any support and assistance services necessary to comply with the financial aid application requirement described in Education Code section 51225.7(b) that may be available through outreach programs, including, but not limited to, those programs operated by the Student Aid Commission, postsecondary immigration resource centers, college readiness organizations, community-based organizations, and legal resource organizations (Ed. Code, § 51225.7(e)(1)).	\$81,438 - \$1,731,521
Indirect Costs identified	\$47,755 - \$501,332
Offsetting Revenues or Other Reimbursements	(\$0)
10 Percent Late Filing Penalty	(\$0 - \$1,843,394)
<b>Total Costs</b>	<b>\$880,067 - \$8,222,922</b>

**Table 2. Estimated Annual Costs for 2023-2024 and Following**

Commencing with the 2022-23 school year, confirm that a pupil in grade 12 either completes and submits to the United States Department of Education a Free Application for Federal Student Aid (FAFSA); or, if the pupil is exempt from paying nonresident tuition pursuant to Education Code section 68130.5, the pupil completes and submits to the Student Aid Commission a form established pursuant to Education Code section 69508.5 for purposes of the California Dream Act (also known as the CDAA), unless the parent or legal guardian of the pupil, or the pupil if the pupil is a legally emancipated minor or 18 years of age or older, elects to opt out of the requirements of this section by filling out and submitting an opt-out form to the school district or county office of education (Ed. Code, § 51225.7(b)).	\$766,668 - \$6,816,681
If it is determined that a pupil is unable to complete and submit the FAFSA or CDAA, or an opt-out form, exempt the pupil or, if applicable, the pupil's parent or legal	\$99,098 - \$980,820



guardian, and complete and submit an opt-out form on the pupil's behalf (Ed. Code, § 51225.7(d)).	
Ensure that each pupil in grade 12 and, if applicable, the pupil's parent or legal guardian, is directed to any support and assistance services necessary to comply with the financial aid application requirement described in Education Code section 51225.7(b) that may be available through outreach programs, including, but not limited to, those programs operated by the Student Aid Commission, postsecondary immigration resource centers, college readiness organizations, community-based organizations, and legal resource organizations (Ed. Code, § 51225.7(e)(1)).	\$144,809 - \$2,625,639
Indirect Costs identified	\$56,311 - \$524,258
Offsetting Revenue	(\$0)
Late Filing Penalty	(\$0 - \$1,848,691)
<b>Total Costs</b>	<b>\$1,066,886 - \$9,098,707</b>

### **Assumptions**

1. There are fewer claims in the first two years of the reimbursement period because the requirement to confirm that a pupil in grade 12 either completes and submits to the United States Department of Education a FAFSA, a CDAA, or an opt out form does not start until the 2022-2023 school year (more than a year after the beginning of the period of reimbursement), and no one-time activities were approved or requested by school districts as reasonably necessary activities to comply with the mandate. There are six claims filed for 2021-2022, 18 claims filed for 2022-2023, and 26 claims filed for 2023-2024. Since six school districts filed reimbursement claims for fiscal year 2021-2022, and reimbursement does not begin until the 2022-2023 school year (which typically runs from August 2022 through June 2023, with costs beginning in fiscal year 2022-2023), the Commission does not count those six 2021-2022 claims in the calculation of this Statewide Cost Estimate.<sup>11</sup>
2. The Fresno Unified School District (FUSD) is removed from the estimated calculations because it claimed over \$2.2 million for Activity A in 2022-2023, or \$449.28 per pupil for 4,903 seniors for all three activities. This amount is over three times the next highest district that claimed for the initial claiming period (ABC Unified at \$140.13 per pupil).
3. Offsetting revenue will be \$0 because that was the amount identified in all the reimbursement claims filed, and no specific offsetting revenue was identified in the Decision and Parameters and Guidelines.

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<sup>11</sup> The following school districts filed reimbursement claims for fiscal year 2021-2022: Anaheim Union High School District, Fremont Union High School District, Gateway Unified, Hemet Unified, Santa Clara Unified, Twin Rivers Unified.

4. The Public Policy Institute of California calculated 57.6 percent of 472,751 seniors filed a FAFSA or CDAA in 2022-2023, and 74.9 percent of 466,682 seniors filed either of these applications in 2023-2024.<sup>12</sup> The PPIC article also mentions a drop in financial aid applications in 2023-2024 because of the new federal FAFSA Simplification Act late rollout and problems with the form.
5. The total amount for this program may be lower than the Statewide Cost Estimate based on the Controller's audit findings. Pursuant to Government Code section 17561, the Controller may conduct audits and reduce any claim it deems to be excessive or unreasonable.
6. Only 26 school districts filed 2023-2024 reimbursement claims out of 421 eligible public-school districts that include grade 12 pupils.<sup>13</sup> The low filing rate is likely due to the number of districts that will choose to opt into the K-12 Mandate Block Grant rather than filing claims (see #7 below).
7. The future annual costs for this program may be lower than the Statewide Cost Estimate if this program is added to the K-12 Mandate Block Grant and school districts voluntarily participate in the Block Grant. School districts that voluntarily participate in a program added to the block grant cannot claim through the State's reimbursement process.<sup>14</sup> The block grant allows school districts to receive a per pupil allocation to carry out reimbursable state-mandated activities.

## **Methodology**

### **A. Initial Reimbursement Period (2022-2023) Cost Estimate**

The low estimates for the initial reimbursement period (fiscal year 2022-2023) are the amounts claimed, based on 17 actual unaudited reimbursement claims filed for 2022-2023 (all except Fresno Unified as explained below).<sup>15</sup> The high estimate of potential costs multiplies the amount calculated per pupil by all seniors statewide in 2022-2023, multiplied by the percentage of seniors that filed a FAFSA or CDAA (for Activity A), or the percentage that opted out (for Activity B).<sup>16</sup>

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<sup>12</sup> Exhibit D (3), Public Policy Institute of California, Implementing California's Universal Financial Aid Application Policy, <https://www.ppic.org/publication/implementing-californias-universal-financial-aid-application-policy/> (accessed on April 22, 2025), Table 3, pages 8, 14.

<sup>13</sup> Exhibit D (1), California Department of Education, List of School Districts, <https://www.cde.ca.gov/re/lr/do/schooldistrictlist.asp> (accessed on Feb. 19, 2025). Elementary school districts were subtracted from the total.

<sup>14</sup> Government Code section 17581.6(c)(3).

<sup>15</sup> Exhibit D (4) Spreadsheet of Claims Data.

<sup>16</sup> Exhibit D (3), Public Policy Institute of California, Implementing California's Universal Financial Aid Application Policy, <https://www.ppic.org/publication/implementing-californias-universal-financial-aid-application-policy/> (accessed on April 22, 2025), Table 3, page 8.

Activity A., requires the school district to confirm that a pupil in grade 12 either completes and submits to the United States Department of Education a FAFSA; or, if the pupil is exempt from paying nonresident tuition, the pupil completes and submits to the Student Aid Commission a CDAA, unless the parent or legal guardian of the pupil, or the pupil if the pupil is a legally emancipated minor or 18 years of age or older, elects to opt out of the requirements.

For Activity A., the high estimate is calculated on a per-pupil basis by dividing the costs claimed by the number of seniors in the 17 claiming school districts.<sup>17</sup> The cost per pupil is multiplied by the number of seniors statewide, multiplied by the percentage who filed a FAFSA or CDAA. All claiming districts are used in the calculation except for Fresno Unified School District (FUSD), which claimed over \$2.2 million for Activity A. in 2022-2023, or \$449.28 per pupil for 4,903 seniors for all three activities. This amount is over three times the next highest district that claimed for the initial claiming period (ABC Unified at \$140.13 per pupil).

Activity A. actual costs claimed [\$674,130.70] / the number of pupils [26,707] =  
**Activity A. cost per pupil [\$25.24]**

Activity A., high estimate, cost per pupil [\$25.24] \* the number of seniors statewide (466,682) = [\$11,779,053.68] \* the percentage who filed a FAFSA or CDAA [57.6%] = **Activity A. cost [\$6,784,735]**

Activity B., requires school districts, if they determine that a pupil is unable to complete and submit the FAFSA or CDAA, or an opt-out form, exempt the pupil or, if applicable, the pupil's parent or legal guardian, and complete and submit an opt-out form on the pupil's behalf.

For Activity B., the high estimate is calculated by dividing the costs claimed by the number of seniors in the 11 school districts that filed for reimbursement for Activity B., not including FUSD for the same reasons stated above for Activity A. The cost per pupil is multiplied by the number of seniors statewide, multiplied by the percentage who opted out of filing a FAFSA or CDAA.

Activity B. actual costs claimed [\$76,742.99] / the number of pupils [14,463] =  
**Activity B. cost per pupil [\$5.30]**

Activity B. high estimate, cost per pupil (\$5.30) \* the number of seniors statewide (466,682) = [\$2,473,414.60] \* the percentage who opted out of filing a FAFSA or CDAA (42.4%) = **Activity B. cost [\$1,048,728]**

Activity C., requires school districts to ensure that each pupil in grade 12 and, if applicable, the pupil's parent or legal guardian, is directed to any support and assistance services necessary to comply with the financial aid application requirement described in Education Code section 51225.7(b) that may be available through outreach

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<sup>17</sup> District data was obtained from <https://www.ed-data.org/>. Only schools that include grade 12 pupils were counted. Exhibit D (2), Ed Data, Education Data Partnership, Fiscal, Demographic, and Performance Data on California's K-12 Schools, <https://www.ed-data.org/> (accessed on April 18, 2025).

programs, including, but not limited to, those programs operated by the Student Aid Commission, postsecondary immigration resource centers, college readiness organizations, community-based organizations, and legal resource organizations.

For Activity C., the high estimate is calculated by dividing the costs claimed by the number of seniors in the 10 school districts that filed for reimbursement for Activity C., except for FUSD for the same reasons stated above for Activity A. The cost per pupil is multiplied by the number of seniors statewide, multiplied by the percentage of districts that filed reimbursement for Activity C. in 2022-2023.

Activity C. actual costs claimed [\$81,437.95] / the number of pupils [12,916] =  
**Activity C. cost per pupil [\$6.31]**

Activity C. high estimate, cost per pupil (\$6.31) \* the number of seniors statewide (466,682) = [\$2,944,763.42] \* the percentage of districts that filed for Activity C (58.8%) = **Activity C. cost [\$1,731,521]**

**Indirect Costs:** The low estimate for indirect costs is those indirect costs actually claimed for 2022-2023, except for FUSD for the reasons stated above under Activity A. The high estimate is the combined cost for all activities multiplied by the average indirect cost rate for all claims, less indirect costs claimed.

Indirect Costs Actually Claimed [\$47,755.43]

**Indirect cost high estimate,** Sum of high estimate for Activities A., B., and C. [\$9,565,984] \* average indirect cost rate for all claims [5.74%] = [\$549,087.48] – indirect costs claimed [\$47,755.43] = **[\$501,332]**

**Offsetting Revenues:** The low estimate is \$0 because none of the initial claims compiled by the Controller reported offsetting revenues. The high estimate is also \$0 because there is no data upon which to make an estimate.

**Late Filing Penalties:** The low estimate is \$0 because none of the initial claims compiled by the Controller were assessed a late filing penalty. The high estimate is the direct and indirect combined cost per pupil for Activities A., B., and C. (calculated by adding the cost per pupil for Activities A., B., and C. to the average indirect cost per pupil (indirect costs per pupil calculated by dividing the indirect costs by the average of pupils in the districts that claimed), multiplied by the number of seniors statewide, less penalties imposed for 2022-2023, multiplied by the 10 percent late-filing penalty.

**Late Filing Penalty high estimate,** combined cost per pupil (\$39.50) \* number of seniors statewide (466,682) = [\$18,433,939] – penalties [\$0] \* 10% late filing penalty = **[\$1,843,394]**

## **B. Projected Annual Costs for Fiscal Year 2023-2024 and Following**

Beginning in fiscal year 2023-2024, future statewide costs are estimated at \$1,066,886 - \$9,098,707 annually for all direct and indirect costs. The low estimate is the costs claimed. The high estimate of potential costs is based on the 25 claimants (all except FUSD as explained below) that filed for reimbursement for 2023-2024, multiplying the amount calculated per pupil by all seniors statewide in 2023-2024, by the percentage of

seniors that filed a FAFSA or CDAA (for Activity A.), or the percentage that opted out (for Activity B.).<sup>18</sup>

Activity A., requires the school district to confirm that a pupil in grade 12 either completes and submits to the United States Department of Education a FAFSA; or, if the pupil is exempt from paying nonresident tuition, the pupil completes and submits to the Student Aid Commission a CDAA, unless the parent or legal guardian of the pupil, or the pupil if the pupil is a legally emancipated minor or 18 years of age or older, elects to opt out of the requirements.

For Activity A., the high estimate is calculated on a per-pupil basis by dividing the costs claimed by the number of seniors in the 24 claiming school districts (Hanford Joint Union did not claim for Activity A.). The cost per pupil is multiplied by the number of seniors statewide, multiplied by the percentage of seniors who filed a FAFSA or CDAA. All claiming districts are used in the calculation except for FUSD, which claimed over \$2.2 million for Activity A. in 2023-2024, or \$472.96 per pupil for 4,997 seniors for all three activities. This amount is over three times the next highest district that claimed for the initial claiming period (ABC Unified at \$137.41 per pupil).

Activity A. actual costs claimed [\$766,667.96] / the number of pupils [34,839] =  
**Activity A. average cost per pupil [\$22.01]**

Activity A. high estimate, cost per pupil [\$22.01] \* the number of seniors statewide (477,945) = [\$10,519,569.45] \* the percentage who filed a FAFSA or CDAA [64.8%] = **Activity A. cost [\$6,816,681]**

Activity B., requires school districts, if they determine that a pupil is unable to complete and submit the FAFSA or CDAA, or an opt-out form, exempt the pupil or, if applicable, the pupil's parent or legal guardian, and complete and submit an opt-out form on the pupil's behalf.

For Activity B., the high estimate is calculated by dividing the costs claimed by the number of seniors in the 14 school districts that filed for reimbursement for Activity B., not including FUSD for the same reasons stated above for Activity A. The high estimate is the cost per pupil multiplied by the number of seniors statewide, multiplied by the percentage who opted out of filing a FAFSA or CDAA.

Activity B. actual costs claimed [\$99,098.28] / the number of pupils [16,990] =  
**Activity B. average cost per pupil [\$5.83]**

Activity B. high estimate, cost per pupil [\$5.83] \* the number of seniors statewide (477,945) = [\$2,786,419.35] \* the percentage who opted out of filing a FAFSA or CDAA (35.2%) = **Activity B cost [\$980,820]**

Activity C., requires school districts to ensure that each pupil in grade 12 and, if applicable, the pupil's parent or legal guardian, is directed to any support and

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<sup>18</sup> Exhibit D (3), Public Policy Institute of California, Implementing California's Universal Financial Aid Application Policy, <https://www.ppic.org/publication/implementing-californias-universal-financial-aid-application-policy/> (accessed on April 22, 2025), Table 3, page 8.

assistance services necessary to comply with the financial aid application requirement described in Education Code section 51225.7(b) that may be available through outreach programs, including, but not limited to, those programs operated by the Student Aid Commission, postsecondary immigration resource centers, college readiness organizations, community-based organizations, and legal resource organizations.

For Activity C., the high estimate is calculated by dividing the costs claimed by the number of seniors in the 17 school districts that filed for reimbursement for Activity C., except for FUSD for the same reasons stated above for Activity A. The cost per pupil is multiplied by the number of seniors statewide, multiplied by the percentage of districts that filed reimbursement for Activity C in 2022-2023.

Activity C. actual costs claimed [\$144,809.11] / the number of pupils [17,242] =  
**Activity C. average cost per pupil [\$8.40]**

Activity C. high estimate, cost per pupil (\$8.40) \* the number of seniors statewide (477,945) = [\$4,014,738] \* the percentage of districts that filed for Activity C (65.4%) = **Activity C. cost [\$2,625,639]**

**Indirect Costs:** The low estimate for indirect costs is those indirect costs actually claimed for 2023-2024 except for FUSD for the reasons stated above under Activity A. The high estimate is the combined cost for all activities multiplied by the average indirect cost rate for all claims, less indirect costs claimed.

Indirect Costs Actually Claimed [\$56,311.33]

**Indirect cost high estimate,** Sum of high estimate for Activities A., B., and C. [\$10,423,140] \* average indirect cost rate for all claims [5.57%] = [\$580,568.89] – indirect costs claimed [\$56,311.33] = **[\$524,258]**

**Offsetting Revenues:** The low estimate is \$0 because none of the initial claims compiled by the Controller reported offsetting revenues. The high estimate is also \$0 because there is no data upon which to make an estimate.

**Late Filing Penalties:** The low estimate is \$0 because none of the initial claims compiled by the Controller were assessed a late filing penalty. The high estimate is the direct and indirect combined cost per pupil for Activities A., B., and C. (calculated by adding the cost per pupil for Activities A., B., and C. to the average indirect cost per pupil (indirect costs per pupil calculated by dividing the indirect costs by the average of pupils in the districts that claimed), multiplied by the number of seniors statewide, less penalties imposed for 2022-2023, multiplied by the 10 percent late-filing penalty.

Late Filing Penalty high estimate, combined cost per pupil (\$38.68) \* number of seniors statewide (477,945) = [\$18,486,912.60] – penalties [\$0] \* 10% late filing penalty = [\$1,848,691]

### **Draft Proposed Statewide Cost Estimate**

On April 25, 2025, Commission staff issued the Draft Proposed Statewide Cost Estimate.<sup>19</sup> No comments were filed on the Draft Proposed Statewide Cost Estimate.

### **Staff Recommendation**

Staff recommends that the Commission adopt this Statewide Cost Estimate of \$880,067 - \$8,222,922 for the Initial Claim Period that began on July 27, 2021 and ends on June 30, 2023.

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<sup>19</sup> Exhibit C, Draft Proposed Statewide Cost Estimate, issued April 25, 2025.

## **DECLARATION OF SERVICE BY EMAIL**

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On May 7, 2025, I served the:

- **Current Mailing List dated April 18, 2025**
- **Proposed Statewide Cost Estimate issued May 7, 2025**

*Free Application for Federal Student Aid (FAFSA)*, 22-TC-05  
Education Code Section 51225.7, as Added by Statutes 2021, Chapter 144  
(AB 132, Section 10), Effective July 27, 2021  
Fresno Unified School District, Claimant

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on May 7, 2025 at Sacramento, California.



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Jill Magee  
Commission on State Mandates  
980 Ninth Street, Suite 300  
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# COMMISSION ON STATE MANDATES

## Mailing List

**Last Updated:** 4/18/25

**Claim Number:** 22-TC-05

**Matter:** Free Application for Federal Student Aid (FAFSA)

**Claimant:** Fresno Unified School District

### TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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