



## What are Promises Made of? The Design of Local College Affordability Programs

David B. Monaghan

Shippensburg University of Pennsylvania

Elizabeth A. Hawke

Shippensburg University of Pennsylvania

U.S. postsecondary education is populated by hundreds of state and local affordability initiatives sometimes referred to as “Promise programs”, many of which claim to make college free or tuition-free. These programs vary tremendously in terms of what they provide, where they can be used, and who is eligible for them. But we know little about the details of their structuring, or about the prevalence of various design features. This makes it difficult to know to what degree findings regarding one program are relevant to any specific unstudied program or to affordability programs generally. We address this gap, systematically analyzing the websites of 314 local Promise programs operating in 2022-23 to describe and measure a wide array of design features. We find, first, that program design variance is highly complex; we discuss 11 rules relating to what is provided, 4 to where programs may be used, and 25 relating to eligibility. Second, the best-studied programs are highly atypical; most programs are usable at single colleges, at community colleges, and have several eligibility requirements beyond residence. Third, there are strong indications that problems use design rules strategically to contain costs, counteracting generosity in one rule with frugality in others. We also highlight the importance of state policy in the creation of local programs and the large number of single-college programs operated by public four-year colleges. This research, while highly applied and empirical, fills crucial gaps in research on free college/Promise programs and financial aid program structuration more generally.

VERSION: April 2025

Suggested citation: Monaghan, David B., and Elizabeth A. Hawke. (2025). What are Promises Made of? The Design of Local College Affordability Programs. (EdWorkingPaper: 25 -1169). Retrieved from Annenberg Institute at Brown University: <https://doi.org/10.26300/hwrk-tv90>

**What are Promises Made of?**

**The Design of Local College Affordability Programs**

David B. Monaghan

Sociology/Anthropology Department

Shippensburg University of Pennsylvania

Elizabeth A. Hawke

Psychology Department

Shippensburg University of Pennsylvania

## **Abstract**

U.S. postsecondary education is populated by hundreds of state and local affordability initiatives sometimes referred to as “Promise programs”, many of which claim to make college free or tuition-free. These programs vary tremendously in terms of what they provide, where they can be used, and who is eligible for them. But we know little about the details of their structuring, or about the prevalence of various design features. This makes it difficult to know to what degree findings regarding one program are relevant to any specific unstudied program or to affordability programs generally. We address this gap by systematically analyzing the websites of 314 local Promise programs operating in 2022-23 to describe and measure a wide array of design features. We find, first, that program design variance is highly complex; we discuss 11 rules relating to what is provided, 4 to where programs may be used, and 25 relating to eligibility. Second, the best-studied programs are highly atypical; most programs are usable at single colleges, at community colleges, and have several eligibility requirements beyond residence. Third, there are strong indications that programs use design rules strategically to contain costs, counteracting generosity in one rule with frugality in others. We also highlight the importance of state policy in the creation of local programs and the large number of single-college programs operated by public four-year colleges. This research, while highly applied and empirical, fills crucial gaps in research on free college/Promise programs and financial aid program structuration more generally.

*Keywords:* free college, Promise program, college affordability, financial aid

## **What are Promises Made of? The Design of Local College Affordability Programs**

Across the political spectrum, Americans agree that college is too expensive. In one recent poll, 87% of people with some college but no degree say that cost is a major reason for not completing (Marken, 2024). In another, just 22% of American adults say that college is worth the cost if one has to take out loans (Fry et al., 2024). Unfortunately, agreement does not extend to what should be done to lower costs. Partisan polarization on this issue (Mettler, 2014) makes significant federal action unlikely in the near-term.

But over the past twenty years, states, colleges, and other organizations have unfurled hundreds of programs claiming to lower the cost of college—even claiming to make it “free”. Many of these are called “Promise programs” or “free college” programs; the terms are often used interchangeably. According to various authorities, there are between 18 (Mishory 2018) and 23 (Jones et al., 2020) Promise/free college programs operated by states, 219 operating locally (Miller-Adams et al., 2023), and 425 (College Promise, 2023; Perna & Leigh, n.d.) operating either statewide or locally. This policy movement is advanced by a network of advocates, policy entrepreneurs, and researchers called PromiseNet and a nationwide advocacy organization called America's College Promise. As this movement is arguably among the most important developments in U.S. financial aid policy and college affordability this century, thoroughly and accurately understanding it is essential for both research and policy.

Scholarship on these programs is extensive (for databases of research, see College Promise, 2020; Upjohn Institute, 2021; for reviews, see Swanson, et al. 2020; Anderson, 2021; Monaghan, 2024), but basic questions remain unanswered. For example, we know very little about the cost reduction (for students and families) achieved by these programs, because this is rarely measured by researchers (for exceptions, see Perna et al., 2020; Monaghan & Attewell, 2023). Researchers commonly infer generosity from program rules—e.g., programs applicable

at four-year colleges or those with first-dollar designs are presumed to provide more aid than those applicable to community colleges and with last-dollar designs, *ceteris paribus*. However, the relationship between rules and spending is not straightforward, and *ceteris* is rarely truly *paribus*. Since the *appearance* of price reduction can impact student behavior (for evidence see Anderson et al., 2024), program behavioral impacts do not prove cost shifts.

Indeed, grasping the relationships among program design, cost reduction, and outcomes requires a thorough understanding of program rules. The rules that constitute college affordability programs have only been broadly outlined by researchers. Indeed, as we show below, the rule-based makeup of financial aid programs *in general* has not been mapped in sufficient detail. And there is much to be learned in this effort. Beyond assessing the *impacts* of rule differences (variance in treatments), it is of interest to grasp what sorts of rules policy-makers have experimented with in the first place. Mapping the empirical distribution and covariance of rules can also assist in learning how aid programs are designed, and why various rules may be adopted. Indeed, since financial aid programs are largely built of rules (that is, rules for the distribution of resources), to map program rules is in effect to map variation in programs themselves.

In what follows, we address this gap in the literature through an analysis of 314 local college affordability programs. We ask three simple questions. First, what are the rules which constitute these programs? Second, what does the universe of programs look like in terms of detailed design variation? Third, what can we learn about the relationships among program rules? Our effort is inductive and empirical; we see it as a necessarily preliminary to establishing processes and effects. Though we limit our investigation to local programs, we believe that our framework can be generalized, with modifications, to any grant or scholarship.

## **Literature Review**

### *Prior research on college affordability programs*

Though, as indicated above, there is a considerable literature on the sort of programs we are studying, there are very basic conceptual matters on which clarity has not been achieved, stymying progress. There are at least six interconnected difficulties which future research must resolve. These are: unclear entity definition and thus universe bounding, insufficient conceptualization or measurement of entity heterogeneity, a lack of clarity regarding legitimate transferability of findings to unstudied cases, sampling bias in the universe of existing research, cherry-picking in construction of literature reviews, and a lack of information about the relationship between variation in features and variation in outcomes. We address each in turn.

First, there is a lack of clarity regarding what a Promise program (or free college program) “is” (for conflicting definitions, see Miller-Adams, 2015:11; Perna & Leigh, 2018: 155-6; Millet et al., 2020:18-20). Definitions are fundamentally about categorization, and therefore category inclusion/exclusion. Very simply, there is no real agreement about what does and does not “count” as a category member. Are all Promise programs “free college” programs, and vice-versa? If not, how do these categories differ and overlap? What distinguishes either category from other types of grants or scholarships? The reasons for this lack of clarity are historical and sociological (see in particular Monaghan et al., 2024), but the implications are practical. When summarizing prior findings (e.g., in a meta-analysis) it is not clear which findings ought to be included. To be sure, unless one believes in Platonic forms, it is not relevant which definition is “correct”. But the achievement of a working definition, and therefore a working stability in categorization, is necessary for cumulation of evidence.

Second, even given boundary stabilization, there is insufficient information about the degree to which category members vary—or even *how* they vary. We will put to one side that program design and the processes of program design are of considerable interest in themselves. A

grasp of program heterogeneity is preliminary to grasping heterogeneous treatment effects. That is, do all Promise programs impact students, schools, communities, and colleges in a unified (or even similar) manner? If not, does this have to do with program variance (heterogeneity of treatments) or variance in program conditions or targets (effect heterogeneity due to moderation)? We detail the present state of the research on this question in the next section of this paper, and our paper represents a preliminary effort to advance understanding precisely on this issue.

Third, it is not clear the extent to which existing findings (from studied cases) are relevant to understanding unstudied or even not-yet-existent cases. Keeping a focus on program effects, if we find that programs A, B and C had a given impact on (say) college participation, can we say with confidence that existing but unstudied programs D and E, and proposed program F, are likely to have similar impacts, and on what basis? This is a matter of the transferability of findings (Lincoln and Guba, 1985), a more imprecise affair than statistical inference or external validity. Still, it should be done not willy-nilly, but judiciously and with support. An intuitive, reasonable working hypothesis is that, *ceteris paribus*, similar causes (e.g., programs) are more likely to have more similar effects than are dissimilar causes. Therefore, in this case a better understanding of how similar programs are is a first step to justifying the extension of findings from studied to unstudied cases. At present, the literature is simply in agreement that affordability programs are very diverse. We should therefore be careful in transferring findings, particularly between quite dissimilar programs.

Fourth, the programs which have been studied have not been sampled from the full universe of programs in any systematic way. This never occurs in research, and we should not expect it to. However, we should grasp the implication: that the universe of studied programs is a convenience sample of all programs, and therefore findings from the first are highly likely to be biased. Meta-analysis does not solve this problem, and can in fact obscure it even more fully. It

could be addressed through the compilation of a reasonably full population list along with relevant features regarding variation and context, allowing the creation of what would effectively be nonresponse weights for use in meta-analysis. At present, findings about Promise or free college programs are drawn disproportionately from a small set of programs such as the Kalamazoo Promise, El Dorado Promise, Pittsburgh Promise, and the Say Yes to Education programs in Syracuse and Buffalo. All of these were launched prior to 2010, are privately financed, and are usable at four-year colleges. If these features are not characteristic of most programs, and if they are relevant to effect sizes, then using these findings to represent the likely effects of most unstudied programs will be misleading.

Fifth, bias in the universe of studies can be aggravated by other authors when writing literature reviews (e.g., in empirical papers). It is quite typical for authors to sample existing literature selectively, disproportionately referencing either better-known studies (the Matthew effect, if you will) or studies supporting the author's beliefs or contentions (confirmation bias). Even within studies, authors may selectively reference better-known, highlighted (e.g., in study abstracts) or agreeable findings. This is standard practice, and likely unavoidable, but is a vector through which biased conceptions can be passed along and solidified into general, shared beliefs. It can be partially ameliorated through quality peer review and systematic reviews and meta-analyses.

Finally, It is not at present clear what the relationship is between program features and program outcomes. The data requirements for such assertions are quite hefty; they are in fact contingent upon resolving the above shortcomings. Consider the assertion that more generous programs have larger impacts on students (e.g., on college participation) than less-generous programs (Miller-Adams & Iriti, 2022:12). Are we certain that "generosity" is even well-conceptualized or measured? How many studies are being used to support this assertion? How were the programs in these studies chosen? Even among the existing studies, how consistent is the relationship? We do not believe that the answers to any of these questions can be made with



confidence. In general, making strong statements about the impacts of program design variance cannot be done with confidence until a sizable and fairly representative set of cases has been rigorously studied.

All of these matters are central to the process of scientific analysis and are highly policy-relevant. They are interdependent, and addressing later difficulties requires first achieving some clarity on earlier ones. We cannot confidently speak about what average program effects are, or how they differ in their impacts, and the extent to which existing findings are relevant to unstudied programs until we have achieved some stable definition of the program universe, mapped program variance, studied a large number of programs, and corrected for biases in research sampling.

The purpose of this paper is to address just one of these matters—the empirical mapping of program variation—but this is central and preliminary to advancing the literature.

### *Examining Student Aid Program Design*

Financial assistance is nearly as old as the university itself, but until relatively late it was limited to ad hoc assistance to individual students from either colleges or private patrons (Fuller 2014). Mass, state-provided student aid programs only became common after the Second World War. Such programs are now found in most high-income and many middle- and lower-income countries, though their importance is less where tuition and fees are kept low by direct state financing of higher education (Czarnecki et al., 2021; Willemse & De Beer, 2012).

Among high-income countries, the United States has very high average tuition relative to per capita income, and higher education is highly privately financed (OECD, 2024). Its high participation level is maintained by a bewildering thicket of financing instruments. The federal government makes grants available to lower-income students and military veterans, provides

loans through several programs, and issues additional aid through a partially refundable tax credit (the American Opportunity Tax Credit). States provide additional grant aid, typically targeted by income, academic performance, or both, and varying markedly in amount (College Board, 2024). Colleges provide billions of dollars per year in “institutional grants”, some of which are provided in a systematic fashion (e.g., income-based) and most of which are individualized. Finally, there are numerous private entities (e.g., employers and foundations) which provide small amounts of grant (scholarship) aid, and banks provide private loans.

Given the importance and complexity of student aid in the U.S., there have been surprisingly few systematic attempts to gain empirical or conceptual leverage over it. Commonly, researchers discuss aid programs using a small number of conventional categories: grants versus loans or need- versus merit-based grants.

Attempts to examine program variation empirically tend to focus on a small subset of features. Perna and colleagues (2008) examined 103 “programs to promote college enrollment” created by the federal government or one of five states. Programs were studied using four nominal variables: enrollment barrier addressed, intervention target level (e.g., students, schools, etc.), target population, and grade level at intervention time. Financial aid programs are just one type of intervention studied, so variation among them is only indirectly addressed. Custer and Akaeze (2021) analyzed variance in initial eligibility requirements among 354 state grant programs. They identified eighteen ways that eligibility can be conditioned: citizenship status, residence, military or public safety affiliation, “member of special population” (e.g., foster children, single parents, residents of manufactured homes), age, selective service registration, prior program completion (e.g., mentoring, college success course, participated in a state fair), high school graduation status, high school or college GPA, SAT/ACT test score, specified high school curriculum, college degree status, incarceration status, criminal conviction status, drug

conviction status, financial need, financial standing (e.g., no loan default), and other state grant receipt.

The rapid recent proliferation and diversification of local affordability programs (i.e., the Promise movement) compelled researchers to conceptualize student aid design more systematically. First, Miller-Adams (2015) cross-classed programs according to where they could be used (restrictive vs. expansive), and who was eligible (universal vs. limited), creating a four-group typology. She operationalized the first distinction through the *number* of applicable colleges and eligibility only through income and merit criteria. Iriti et al. (2016) next added *scholarship generosity* as a third way in which programs vary, defining this in terms of first- vs. last-dollar design, whether the award is limited, and to what expenses it can be applied. Miller-Adams and Smith (2018) and Miller-Adams (2021) added differentiation according to program funding and administration: community-based, state, or institutional.

Additionally, recent work added complexity to existing dimensions of variation. Perna and Leigh (2018), analyzing both state and local programs, noted variation in geographic residence restrictions, and that use restrictions can refer to not just number but also control and level of college. Swanson et al. (2020) pointed out variance in terms of money and nonfinancial services provided. Beginning around 2017, researchers at the Upjohn Institute began measuring program variation using two continuous scales. They did so by combining aspects of what the program provides (the *intensity* of the incentive) and of who is eligible (termed *saturation*) (Miller-Adams et al., 2023). Relatedly, Miller-Adams and McMullen (2022) made use of nine design features to create an “equity index”, and classed programs in terms of their potential to increase educational equity (high, medium, or low). Perna and Leigh’s (2018) clustering typologies employed five nominal variables: a composite defining restrictiveness in terms of number and level of colleges (a composite), presence of need and/or merit eligibility

restrictions, a composite of award structure (first vs. last dollar) and whether there is a guarantee of full tuition coverage, and an early commitment requirement indicator.

The above efforts have produced the insight that grant programs have three sets of rules regarding program design. First, they vary in terms of *what they provide* to recipients, which we term *provision*. For the most part, provision is monetary, but can include provision of voluntary services as well. Second, they vary in terms of *where they can be used*, which we term *applicability*. Third, they vary in terms of *who can use them*, which we term *eligibility*. Programs also vary in terms of aspects of funding and of administration, but this refers not to program design but to program infrastructure.

Establishing these rule-sets is not the same as specifying their contents, and this has been very partially and arbitrarily accomplished to date. It is to establish a more exhaustive framework for analysis of aid programs that we orient our efforts.

## **Methods**

### *Cases*

We compiled a list of local<sup>1</sup> college affordability (“Promise” or “free college”) programs in existence during the 2022-23 academic year, during which we completed this task. We had four conceptual inclusion criteria. Programs were included if they:

1) supply a monetary award or its equivalent (e.g., a tuition waiver) at least potentially equal to or greater than \$500. We deemed awards below this cutoff too small to credibly impact

---

<sup>1</sup> We excluded fully state programs - those with statewide eligibility, within-sector statewide applicability, and state funding & operation

behavior. Programs without monetary components (e.g., guaranteed transfer programs) were excluded.

2) are distributed to those deemed eligible as an entitlement or until exhaustion of funds. We thus excluded scholarships restricted to small numbers of recipients.

3) are applicable to at least one public college. We excluded programs usable only at private colleges (e.g., the Drexel Promise).

4) are usable by first-time college students, though not necessarily restricted to these students. This excludes completion or transfer grants, which do not credibly impact initial college participation.

In addition, for practical reasons, we only included programs with a website that, during our data collection window, was up-to-date and sufficiently informative about basic program features.

We identified programs initially through databases gathered by the Upjohn Institute (Miller-Adams et al., 2023<sup>2</sup> and the University of Pennsylvania Graduate School of Education's Alliance for Higher Education and Democracy (PennAHEAD) (Perna & Leigh, n.d.). These contained 192 and 425 programs respectively. After removing duplicates and applying exclusion criteria, we retained 173 programs. We subsequently became aware of program lists maintained by College Promise (2021) and WestEd (n.d.) containing 290 and 131 local programs respectively. Of these, we retained programs not already on our list which met our criteria; this added 67 programs (totaling 240). We then carried out a systematic web search for additional programs using the terms "Promise program", "college promise", "free college" and "free tuition", each in

---

<sup>2</sup> We used an earlier incarnation of this database sent to us upon request in February 2021

combination with the names of all fifty states and Washington DC. We identified an additional eligible 74 programs, bringing our total to 314.

### *Features*

We gathered program data from web searches. Program websites were our primary sources, but we supplemented them with press releases, news stories, and other sources. Since our goal was to discover all the ways in which programs vary, we did not begin with a fully defined feature list. Instead, we expanded and modified our feature list and the response categories for features repeatedly throughout data collection. As modifications necessitated re-coding of previously coded cases, the process was iterative. We discuss each feature below.

Even the most informative websites do not explicitly state all program features. For instance, programs that *do not* limit eligibility by high school GPA do not typically state this outright; they only list eligibility restrictions they *do* apply. We therefore assigned default values for each feature in the absence of explicit information. We did this mostly through “common-sense” assumptions. For instance, we took the absence of reference to a specific eligibility restriction as sufficient to conclude that the program did not restrict eligibility in that manner. Where this method was not tenable, we adopted modal response categories as defaults.

### **Findings**

We proceed with the results of our inductive inquiry into how local college affordability programs vary. We concur with prior researchers that rules can be usefully sorted into three categories: those relating to what programs *provide* to recipients (which we term *provision*), those relating to where programs may be used (*applicability*) and those relating to who may use the program (eligibility). However, each of these categories contains not one or two but several rules, and this complexity was previously not elaborated. The precise number is indeterminate, depending

on an observer's decisions regarding measurement and relevance. In this paper we discuss 11 provision rules, 4 applicability rules, and 25 eligibility rules. We divided the latter into 19 rules for initial eligibility and 6 for continuing eligibility (i.e., to retain the scholarship after the first award period). Programs also vary in ways unrelated to design, according to what we label *demographics and infrastructure*: age, location, funding, and administration.

We proceed as follows: demographics and infrastructure, provision, applicability, initial eligibility, and continuing eligibility. In each section, we take features one at a time, defining, presenting our measurement approach, and discussing empirical variation. As we do, we offer some insights into covariance among features, though we do not address this systematically.

### **Demographics and infrastructure.**

*Year launched.* New student aid programs are born twice, if you will. First, they are publicly announced. Second, they begin granting awards. These events rarely coincide. Depending on design and implementation, the gap between announcement and award can be a few months to several years (e.g., an early commitment program). We measure the program's beginning through the year it first made awards, which for ease of presentation we group into four historical periods.

Eight of the programs in our sample were launched prior to 2005—that is, they predate the Kalamazoo Promise (KP). As Miller-Adams (2015) has noted, KP was not the “first of its kind”, though as the first widely-publicized such program it was the category progenitor. The wave of proliferation including and following KP (2005-2009) produced 48 programs (15% of the sample), a rate of 9.6 programs per year. The next five years (2010-2014) witnessed a slowdown in program creation (35 programs, or seven per year). Program creation then skyrocketed in the wake of the Tennessee Promise (2014); More than half (168, or 55%) of all the programs in our sample programs appeared between 2014 and 2019, a rate of 33.6

programs per year. Our data suggests another slowdown after this period, but we have less confidence in our data's comprehensiveness for this most recent period.

We caution that our sample is afflicted by survivorship bias. We did not create a comprehensive list of all programs that have ever existed, so our estimates of program creation by period are likely downwardly biased, particularly for earlier periods. However, cross-referencing against early lists (e.g. Miller-Adams 2015) did not reveal many additional early programs. We strongly suspect that our characterization of temporal variance in the incidence of program emergence is broadly correct. Nonetheless, we welcome future research to confirm.

*(Insert Figure 1 about here)*

*Location.* Programs are spread unevenly across states. The largest concentration (93, or 34%) is in California, reflecting a unique policy model (the California College Promise, established in 2017 through AB19) whereby the state provides funding for its community colleges to create their own programs. Most, though not all, of California's programs were created through this policy. Michigan's relatively large concentration is a product of 2008 "Promise Zone" legislation creating and partially funding local-based scholarships through "captured" property taxes. To date, thirteen zones have been authorized, creating ten of Michigan's sixteen existing programs. Other large concentrations are in Texas (37), North Carolina (16), Wisconsin (14) and Illinois (13). These six states account for 61% of the programs in our sample.

*Funding and administration.* Programs all require revenue and the accomplishment of administrative tasks (communication, certifying eligibility, awarding funds, and more). These may be provided by the same entity, but often are not. We opt for nominal classification. Funding is provided by a college, a government (state or municipality), three or fewer private donors, or four or more private donors. Administration is by a college, a government, or a nonprofit organization. Determining administration is more straightforward than funding. For



instance, colleges may fund a program fully or in part through a fundraising campaign (rather than through general operating revenue) without indicating this clearly on their websites. We may thus underestimate the number of programs which are somewhat privately funded. We also do not include a “mixed” category, assigning programs on the basis of what seemed like the dominant funding source. For example, we class Michigan Promise Zones as publicly financed.

We find that most college affordability programs in our sample are creatures of the public sector. Fully three-quarters of programs are administered by a (public) college, including 100% of college-funded programs and 62% of programs funded otherwise. Funding is equally split between colleges and governments (about 36% each), but this is because of California’s and Michigan’s state-funded local programs. Outside these states, only 25 programs (12%) are funded directly by governments. 81 programs (25%) are privately funded and fifty-five (19%) are privately administered. 48 privately funded programs are also privately administered (60%), with most of the remainder administered by a college. The overwhelming role of colleges in administering programs, regardless of funding, is a function of the dominance of single-college programs (discussed below).

(Table 1 about here)

### **Provision rules.**

(Table 2 about here)

*Relationship to other grants.* Programs may alter their award according to a student’s receipt of other grants. In practice they do so by *reducing* grants on a dollar-to-dollar basis. Programs that do not do this are *first-dollar scholarships*. Programs that adjust on the basis of *all* other grants and scholarships are *last-dollar scholarships*. *Middle-dollar scholarships* adjust according to *some but not all* other awards. Some state grants reduce awards using federal but not other

state scholarships. Local “middle-dollar” programs tend only to exempt private scholarships, and in practice this matters little since few students receive such awards. For this reason, we class local programs as either first- or last-dollar. As shown in Table 2, among local programs, last-dollar programs utterly predominate (93%). 61% of first-dollar scholarships are privately-funded.

*Award applicability.* Programs vary in terms of what expenses their award may be used to cover. Some cover tuition only. Others cover tuition and mandatory fees. Others can be used to cover additional educational expenses (e.g., room and board, course materials). Still others can cover living expenses. This classification is complicated by programs at colleges in which “tuition” is not charged (e.g., California’s community colleges). We class California programs as “tuition only” if they only cover per-credit fees (which function as tuition) but not other mandatory fees. Usually awards that cover expenses beyond tuition also cover tuition, but that need not be the case. For instance, since the statewide Tennessee Promise already covers tuition, Nashville’s Getting Results by Advancing Degrees (GRAD) program covers only costs such as required course materials and transportation. And to be clear, just because a program award can be applied to an expense does not mean it will fully cover this expense.

Most awards can be applied only to tuition or tuition and fees; only 18% cover expenses beyond this. Most programs applicable to living expenses are first-dollar, have a maximum award, and funds-limited<sup>3</sup>, as the “last dollar” of student living expenses cannot be specified. Philadelphia’s municipal Catto Scholarship provides a finite living allowance, which is in effect a separate flat first-dollar grant stacked on a last-dollar grant. 45% of programs covering something beyond tuition and fees are privately funded.

---

<sup>3</sup> See below, under initial eligibility rules.

*Minimum award.* Since community college tuition is often less than a full Pell grant, a last dollar, tuition-only community college scholarship will often provide no funding to low-income students (see, e.g., Monaghan & Attewell, 2023). To compensate for this, some programs institute a *minimum award*: a given dollar amount that they will provide at minimum to each student. If the student has no leftover tuition or fees after other grants, the minimum grant may be applied to course supplies. If all college costs are covered and the minimum expense has not been exhausted, the student is given a cash award. Only 6% of programs provide a minimum award.

*Book/supply voucher.* The other way that last-dollar community college grants can ensure some spending on lower-income students is to provide all eligible students with a flat voucher to the school bookstore. Thirteen percent of programs do this, most of which are in California. One-third of California's programs provide a voucher, compared with 5% of programs elsewhere.

*Number of years/semesters/credits funded.* Programs typically specify that they will fund attendance for a finite number of periods. This is different from, but related to, temporal eligibility restrictions (see below). Alternatively, programs may limit the number of credits that will be covered. For measurement purposes, we made all restrictions equivalent to years (presuming two semesters per year and 15 credits per semester). Most programs either provide two (55%) or four (31%) years of funding, corresponding directly to whether the award is usable at a four-year college. A few programs provide three (23 programs) or five (12 programs) years.

*Maximum award.* Programs may cap the amount they will provide to students. For example, the Pittsburgh Promise provides up to \$5,000 to students per year. If the cap is less than the full cost of an applicable expense, the award does not guarantee coverage of that expense. For some students but not others, a capped last-dollar award may cover a given expense by

leveraging other funds (e.g., Pell grants). In practice, every award has a maximum expenditure; a last-dollar tuition guarantee maxes out at the full cost of tuition. Some programs institute a specified maximum award when applied to more expensive colleges. For instance, programs usable at either public or private colleges may pay only as much as public college tuition when used at a private college. We class programs as having a maximum award only when a cap is explicitly quantified and applied regardless of college attended.

Maximum awards are found at 15% of programs. These tend to counteract other program features that increase costs. So, 67% of first-dollar programs have caps compared with 12% of last-dollar programs, and 47% of programs that cover costs beyond tuition and fees have caps compared with 5% of tuition-only programs and 10% of tuition and fee programs. Maximum awards are found at more programs usable at four-year colleges (27%) than those usable only at community colleges (8%). Of the 48 programs with maximum awards, 69% set that maximum at or below \$5,000 and 40% at or below \$2,000.

*Scaled award.* Some programs adjust absolute awards or share of eligible expenses covered by students' status according to some other criteria. Most commonly, programs scale awards depending on length of residency in the eligible locality. For instance, the Kalamazoo Promise offers 100% tuition coverage only for students who lived in Kalamazoo and attended Kalamazoo public schools for grades K-12. For students who attended in grades 1-12, it pays 95%, and it continues to reduce the share covered by 5% per year until 9th grade (65%), after which point eligibility ceases. Other programs adjust awards based on family income or academic measures.

33 programs (11%) have scaled awards, 28 of which scale by residence length. 10 of these programs are in Michigan and this feature occurs in 62% of Michigan programs. Nine more are located in nearby states. 45% programs with this feature were launched prior to 2013. These

facts suggest this feature's distribution is driven by local and temporally-bounded emulation of the Kalamazoo Promise.

*Variation by college/sector.* Some awards offer different awards depending on what college a student attends. In practice, any last-dollar award applicable to more than one college does this if the colleges have different tuition charges. We restrict this to programs that vary their specified maximum awards depending on college attended. This feature is more common among state programs (e.g., Georgia's HOPE and Zell Miller scholarships); it characterizes just 14 local programs (4.5%).

*Variation by student level.* Programs can fund students differently depending on the student's current standing. For instance, some offer smaller awards to first-year students and increase the award for later years, presumably to incentivize persistence. Given that the majority of dropout occurs in early years, such a rule would also reduce spending. We do not observe any local programs with this feature, but it is encountered at state programs (e.g., Arkansas' Academic Challenge Scholarship).

*Full expense guarantees.* Programs may explicitly guarantee that an applicable expense will be fully covered by the award. This guarantees that the student will pay \$0 for that item. Most such programs guarantee tuition only, but some guarantee tuition and fees (see above for how we distinguish fees for California's community colleges). Such programs often advertise themselves as offering "free tuition" or "free college". We classify programs only according to tuition guarantee provision (as nearly all programs guaranteeing anything else will also guarantee tuition), and we do so separately for guarantees of tuition at four-year colleges and at community colleges.

Tuition guarantees are the rule among the programs in our sample; only 14% do not guarantee tuition at any college. 58% of programs guarantee tuition only at a community college, 23%

guarantee only at a four-year college, and 4% guarantee tuition at either. Generally, four-year only guarantees programs are financed and operated by individual four-year colleges (87%), while programs that guarantee at either are typically privately funded and operated (86%), like the Kalamazoo Promise or the El Dorado Promise.

*Additional services.* Programs may provide eligible students with perks and services beyond awards. Some are in-kind grants, such as parking passes or a bus pass. Others are procedural privileges, such as priority registration. Others are enhanced student services that eligible students may access if they wish. For instance, programs may designate an advisor with a reduced caseload to service program-eligible students. We only class services under provision if they are strictly voluntary. If a “service” is required, we count it as a procedural eligibility restriction, since noncompliance disqualifies a student from eligibility. This distinction, we believe, is of tremendous practical importance, and both programs and researchers frequently discuss such requirements as services rather than as eligibility rules.

Most programs (243, or 77%) do not provide any additional voluntary services, perks or privileges. Just under a quarter provide at least one, 15% provide at least two, and 9% provide at least 3. The commonest such provisions are a specific advisor (10%), priority registration (9%), a coach or mentor (9%), program events (4%) or workshops (3%), provision of technology (e.g., laptop rental) (3%), a specified career services staff (2%), and a public transit voucher (2%).

### **Applicability rules**

*Extensiveness.* Programs vary in the number of colleges where they may be used. Obviously, any program is applicable to a finite number of schools (e.g., Pell grants are restricted to Title IV eligible schools), but local programs tend to be more narrowly restricted. We coded programs as restricted to use at single colleges, at more than one but fewer than all in-state colleges (of

the applicable level), at all in-state colleges (of the applicable level), or at more than all in-state colleges (e.g., the El Dorado Promise may be used at any college nationwide).

*(Table 3 about here)*

Fully 81% of programs are single-institution scholarships, and another 10% are usable at a small number of colleges. These latter are a diverse group - some municipally-funded scholarships (such as Boston's Tuition-free Community College Plan), some operated by a public university system (e.g., the Nebraska Promise), some operated by municipal or county system of community colleges (e.g., the Dallas County Promise), some Michigan Promise Zone scholarships (e.g., Flint Promise), and others. Another 19 programs (6%) can be used at any in-state college within their applicable sector (e.g., any in-state public four-year), and eleven (4%) can be used beyond state borders. Of programs in these latter two categories, all can be used at both community colleges and four-year colleges, and nearly all (25) are privately-funded. Thus, in Miller-Adams' (2015) terminology, the vast majority of programs are "restrictive", while "expansive" programs are rare.

*Applicable level and sector.* Programs are often restricted to use at certain types of colleges. Programs may or may not be usable at: community colleges, public four-year colleges, and private colleges. Some may be used at colleges in all these sectors. This dimension is important to specify independently of the number of applicable colleges. But obviously single-institution programs are restricted to the sectors of the applicable college.

Since most programs are single-institution, most are applicable either only at a community college (194, or 62%) or at a public four-year (79, or 25%). Ignoring such programs, 41 out of 61 programs (67%) can be used in either college level. Thirty-six of these 41 are privately funded. 28 programs usable at either a community college or a public four-year can be used at any in-state or more broadly, while 13 can be used at a handful of colleges.

Additionally, 37 programs (12%) can be used to attend some private-sector colleges. None pay full tuition at these colleges; they either set specific award caps (25 programs), or cover the equivalent of public college tuition. Most (29) are privately-funded, but a few are funded by municipalities or states.

*Program applicability.* Some programs are restricted to use only at specified degree or certificate programs *within* applicable colleges. Statewide “workforce development” grants (e.g., ArFuture or WorkReady Kentucky) specify “in-demand” programs that they will fund. We measure this dichotomously. Such stipulations are rare among local programs. We located just five, such as the Wichita Promise.

### **Initial eligibility rules.**

*Availability:* Programs vary in terms of how many scholarships are potentially given.

*Entitlements* guarantee an award to all deemed eligible. *Funds-limited* grants provide awards to eligible applicants, usually in order of application, until earmarked funds are exhausted. Most but not all funds-limited programs fund large numbers and shares of eligible applicants. Finally, *limited number scholarships* grant a specified (usually small) number of awards. Most private scholarships are of this latter type. And depending on the number of applicants, these may be competitive. As we largely excluded limited-number scholarships, we have only one in our sample (Clark State Scholars, a full tuition guarantee to a local community college, provides ten awards per year to qualifying students from each middle school in each of eight large school districts. As this is a potentially large number of awardees, and a potentially large share of cohort members from eligible districts who attend this college, we opted for inclusion). Our sample includes only twenty-eight funds-limited awards; the remainder (90%) are entitlements.

*Geographic restrictions.* Nearly all non-federal student aid programs restrict eligibility to residents of certain areas. Virtually all state grants are restricted to state residents, while local



programs may restrict to residents of municipalities, counties, or community college districts. The prominence of such restrictions among early Promise programs led them to be defined in early years as “place-based scholarships” (Miller-Adams, 2015). Alternatively or in addition, programs may restrict eligibility to students of particular public school districts (which overlap imperfectly with residence) or in particular schools. We categorize programs as having local (less than statewide), state, and national/larger than state geographic eligibility.

*(Table 4 about here)*

Nearly all programs we investigated restrict eligibility to residents of a state (144, or 46%) or a locality (168, 54%). Just two programs (the NC Promise and University of Wisconsin-Platteville’s Pioneer Pledge) are open to those beyond state borders. Programs available to in-state residents are disproportionately the state-funded local programs in California. 65 of California’s 93 programs (70%) have statewide eligibility, compared with 79 of 221 (34%) elsewhere. All but 10 of these remaining programs are four-year programs applicable to single colleges or to college systems (e.g., the University of Nebraska system’s Nebraska Promise), as the sponsoring entities have statewide service areas.

*Residency length.* Programs can restrict not only to residents of a locality, but to those who resided there for a minimum designated period. Alternatively, they can require students to attend schools in the eligible district for a given number of years. We classify programs as restricting eligibility in this manner if they require residence or district attendance for more than one year prior to program receipt.

Though Miller-Adams (2015) describes residence-length as essential to Promise programs (Miller-Adams, 2015), they characterize just 22% (69) of our sample. Nearly all (63) restrict geographically to a locality (rather than a state), and just under half (38) are privately-funded. This requirement is universal among awards scaled by residence, but most programs with

residency length restrictions (72%) do not scale award amounts. As with award scaling, residence length requirements are commoner among earlier and Midwestern programs, likely also reflecting emulation of Kalamazoo.

*Temporal eligibility.* Programs often limit receipt not only to certain classes of individuals, but limit the time frame during which otherwise eligible individuals may access programs. We term such rules *temporal eligibility restrictions*, and they are distinct from the *number of funded periods* because they apply regardless of program uptake. Explicit age limitations are rare and typically designate a *minimum* age—e.g., so-called “adult Promise” programs like Tennessee Reconnect. More commonly programs require that recipients *begin* using an award within a given time frame after some significant event—usually high school completion. Programs may require students to begin using the award the following fall, or within the following year, or else forfeit eligibility. Alternatively or additionally, programs may limit program *use* to a given number of years after the significant event (e.g., high school completion or initial award receipt). For example, the Richmond Promise requires that a student *begin* using its award within two years of high school completion, and eligibility *expires* six years after initial use. Temporal eligibility rules work together with rules regarding continuous enrollment and enrollment intensity (see below) to restrict eligibility to students adopting given sets of enrollment patterns.

We categorize programs as those requiring immediate enrollment (i.e, the fall after high school completion), some temporal restriction of five years or less from the significant event, or greater than five years or no restriction. Additionally, we identify “adult” programs. Just under half (47%) of programs have some temporal restriction. A quarter (83) require recipients to begin the semester immediately following high school completion. Another 61 (19%) bound eligibility less rigidly, but require either initial or last eligible use within five years or less following high school completion or initial award receipt. Five local programs are “adult Promise” scholarships, restricting eligibility to those *over* a certain age (usually 24).

*Citizenship status.* Some programs explicitly restrict eligibility to U.S. citizens or lawful permanent residents (LPR). Other programs do not have explicit restrictions but require another status whose prerequisite is citizenship or LPR status: Pell eligibility or a calculated expected family contribution (EFC)<sup>4</sup>. These rules effectively exclude all undocumented students, who are ineligible for Pell and whose FAFSA applications will not be processed (and thus no EFC will be determined). Others require students to complete the FAFSA, which effectively excludes undocumented students ineligible to participate in the Deferred Action for Childhood Arrivals (DACA) program; DACA participants are eligible for the Social Security Numbers required to complete FAFSA. Still others do not restrict eligibility by citizenship.

Just over half of programs (167, or 53%) do not restrict eligibility by citizenship status. The vast majority of these are in California (93, or 56%), Texas (29, or 17%), or other states providing state aid to undocumented students (13, or 8%) and which have a state alternative to FAFSA (e.g., Texas's TAFSA). Of the remaining 32, 19 are privately-funded (e.g., Kalamazoo).

Overall, 83% of programs in “financial aid equity” states do not restrict by citizenship. Among the 87 college- or government-funded programs in states that do not provide such aid, 76 (87%) exclude some or all undocumented students. State policy is thus crucially determinative in this matter.

The remainder of programs prohibit participation by at least some undocumented students. Of the programs that permit participation by DACA participants (but not other undocumented), just four state this explicitly. The remaining 97 programs (31% of all programs) require FAFSA completion in a state without an alternative form. Another forty-six programs (15%) exclude all undocumented students. Most (27 programs) do so by restricting to Pell-eligible students, while

---

<sup>4</sup> This research was completed prior to the replacement of EFC by the Student Aid Index, and we retain the reference to this quantity used by programs at the time

nineteen explicitly bar those who are not citizens or lawful permanent residents. Fourteen of these nineteen are in states with reliably Republican political representation<sup>5</sup>.

*Prior college experience.* Programs can make eligibility contingent on prior enrollment history. The commonest practice is to restrict to first-time, first-year (FTFY) students in higher education. Other programs restrict eligibility to students new to the eligible college; this effectively permits either FTFY or transfer students. Sometimes programs wish to entice students who have stopped out to return and complete by also extending eligibility to those previously but not presently enrolled. Awkwardly, this practice excludes just students who remained enrolled. But nearly all programs exclude otherwise eligible students enrolled at the time of program creation by designating a first eligible high school graduation or college enrollment cohort.

Because it is the commonest and most restrictive restriction of this kind, we only measure programs as restricting (or not) to FTFY students. 77 programs (25%) employ this restriction. But programs requiring immediate enrollment after high school also effectively require first-time, first-year status; there are thus 151 programs which explicitly or effectively restrict to first-time college-goers, or 48% of all programs.

*Income.* Many programs are “need-based”, in that they set an income requirement for eligibility. Some designate specific numeric thresholds using Adjusted Gross Income or EFC. Others require that a student be Pell eligible (which effectively sets an EFC threshold). Obviously the lower the thresholds are set, the more restrictive/targeted the program. We class programs as either having no income restriction, having a threshold higher than Pell eligibility, restricting to

---

<sup>5</sup> Recall, though, that Texas was and is a leader in providing aid to undocumented students (Dougherty et al., 2010).

Pell-eligible students or a similar income threshold, or having a threshold more restrictive than Pell eligibility<sup>6</sup>

Income restrictions are less common than we expected. Two-thirds of programs (213) do not target by income at all. Of those that do, the largest share (51, or 16%) restrict to Pell-eligible students. Another 20 programs set a higher threshold and 30 set a lower one. However, most programs that can be used at a four-year college (80 out of 120) do restrict by income. This is particularly true when the college is funding the program (64 out of 68 programs).

*Academic: high school graduation type.* Programs can restrict using several academic measures—what are commonly called “merit-based eligibility”. The commonest such restriction makes eligibility contingent on secondary school completion type. Programs can restrict to “regular” high school degrees, disqualifying GED holders. They can further restrict to “on-time” graduates from high school. 40% of programs (124) restrict to any regular degree holder, and 17 additional programs (5%) restrict to “on-time” completers.

*Academic: High school grade point average (GPA).* The next commonest practice is to make eligibility contingent on high school GPA threshold. Rules may take into account overall (cumulative) GPA, or may restrict (or additionally consider) GPA in “core” subjects or in specific years (e.g., 12th grade). We categorize programs in terms of GPA threshold, ignoring variance in years or courses considered. Thirty programs (10%) set a threshold at a 2.0 or lower, 33 (11%) set one greater than 2.0 but less than 3.0, and 25 (8%) set their threshold at 3.0 or higher. 226 programs (72%) have no GPA threshold.

---

<sup>6</sup> We operationalized the Pell eligibility threshold in 2022-23 as an AGI of less than \$70,000 or an EFC of less than \$7,000. “Similar to Pell eligibility” was measured as an AGI between \$60-70,000

*Academic: test scores.* Programs can set eligibility thresholds using scores on a test, such as the ACT, the SAT, or a college placement test (e.g., COMPASS), either singly or in combination. 18 programs (6%) set some test score threshold for eligibility.

*Academic: Attendance rate.* Programs can require students to meet some threshold in attendance rate, either cumulatively or in a given year (e.g., 12th grade). Seventeen programs (5%) have such an eligibility rule.

*Academic: curriculum.* Programs can require students to complete specific courses while in high school. For instance, some state merit scholarships require students to complete a specified “college preparation curriculum” for eligibility. These are rare among local programs, with only six (2%) having curriculum-based restrictions.

While no one academic requirement is found in more than half of programs, precisely half (157) have at least one of the five rules described above relating to high school academic behavior, and 27% have more than one such rule. Merit restrictions are thus commoner than income targeting. There is seemingly little relationship between the presence of income- and merit-based restrictions. Programs without income restrictions are just slightly more likely to have a merit restriction (109 of 213 programs, or 51%) as are programs with income restrictions (48 of 101, or 48%). There are 104 programs (33%) with neither income nor merit restrictions, but only nine of these may be used at a four-year college. If we ignore rules relating to the form of high school completion, 98 programs (31%) have academic restrictions, and these rules are slightly more common at income-restricted programs (38% vs. 28%). Roughly half of all programs (154) have neither income nor merit requirements other than “regular” high school completion (what Miller-Adams (2015) calls “universal” scholarships), and 24 such programs can be used at four-year colleges. All but six of these are privately funded.

*Enrollment intensity.* Programs can require that students initially enroll in a minimum number of credits. Most commonly the stipulation is to attend at “full-time” status, which usually means at least twelve credits. Indeed, most programs (214, or 68%) adopt such a rule. California programs are overrepresented in this regard; 88% of these programs have this requirement (compared with 60% of other programs). Such a rule is commoner among four-year applicable programs (80%), but characterizes 61% of community college programs as well. 118 of the 151 programs (78%) which explicitly or effectively restrict to FTFY students require full-time enrollment.

*Moral eligibility.* Some programs establish disqualifying events related to non-academic behaviors. The commonest such events are being arrested for, charged with, or convicted of any crime or of a specific class of crimes (e.g., drug or alcohol related), or being suspended or expelled from school. Restrictions based on student debt repayment status also exist, but usually for state programs. Just 5% of programs we study restrict eligibility by any rule of this type.

*Procedural requirements.* Programs also very commonly make eligibility contingent on the completion of one or another specified procedure. These are many and varied, and nearly all programs adopt at least one.

*Procedure: FAFSA completion.* By far the commonest procedural requirement is completion of the FAFSA or its equivalent (e.g., state alternatives for undocumented students). Such a requirement characterizes 300 of the programs we examine (95%). A FAFSA requirement is virtually axiomatic in the case of last-dollar programs, which typically are only financially viable by leveraging federal and state grants. Of the 14 programs without such requirements, eight are first-dollar awards and eight are privately financed.

*Procedure: Program application.* It seems obvious that completion of a specific program application would be required for eligibility, but just under half (153, or 49%) do not require this. Most such programs (91%, or 138) are single-college programs managed by the college in question. These programs screen all incoming students and automatically award those eligible. We should not assume the potential impact on award coverage to be trivial. When a program application is required, this can only keep constant or reduce the number of awardees. Given estimates that roughly a quarter of Pell-eligible students do not complete FAFSA (Kofoed 2017), the number of otherwise eligible students who do not complete a local program application could also be considerable. Programs managed by entities other than colleges typically cannot do without applications. However, 104 college-operated programs also require such an application.

*Procedure: Community service.* The requirement to complete community service hours is likely inspired by a desire to turn the award into something of an exchange: the student, in order to get something like “free college” must in turn “give back” to their community. Fifteen programs (5%) require that students complete some such hours *prior to* initial award receipt.

*Procedure: Early commitment.* Some programs require students not only to fill out an application, but to do so several years prior to college enrollment—as early as eighth grade. Often such programs impose significant procedural burdens for eligibility in the intervening years - mandating attendance at workshops and other program events, for example. They may also (or alternatively) impose moral and academic criteria for the years subsequent to early commitment; however, we consider these under academic and moral criteria. Several state merit programs (e.g. Indiana’s 21st Century Scholars) are early commitment programs, as are 16 local programs (5%). We suspect that such requirements starkly reduce the pool of awardees, but to the best of our knowledge no research has been conducted on this matter.



*Other initial procedural requirements.* There are many other procedures that programs may require students to negotiate prior to when beginning school in order to attain eligibility. Often these are portrayed as helpful services, and designers may sincerely see them as such. But since they are required, noncompliance is disqualifying, and enforcement will likely reduce the number of awardees. 35% of programs (110) have adopted one or more additional procedural criteria for initial eligibility beyond those we already enumerated. The commonest are, in order, attending an orientation (45), creating an education plan (39), enrolling in a college success course (23), applying to other scholarships (24), signing a pledge (10 programs), submitting high school transcripts (10), declaring a program (8), and writing an essay (7).

### **Continuing eligibility rules**

Programs often establish requirements for students to retain their scholarship beyond the first semester or first year. Some of these are universal or nearly so. For example, programs with geographic residence requirements for initial eligibility mostly require maintenance of such residence, and those requiring initial FAFSA filing also require yearly refiling. We enumerate rules below which are common, but non-universal.

*(Table 5 about here)*

*College GPA.* To remain eligible for federal grants, students must maintain Satisfactory Academic Progress (SAP), which they do by maintaining a 2.0 GPA and completing two-thirds of attempted credits. Since most programs leverage Pell grants to provide last-dollar scholarships, many (58%) also require students to maintain SAP or a 2.0 GPA.. Another 16% of programs (50) set GPA thresholds above this federal minimum. Higher GPA requirements are commoner at programs that guarantee tuition to four-year colleges (29% of such programs), have an initial GPA requirement of higher than 2.0 (33%), or set an academic test score threshold (44%). One quarter of programs do not specify a continuing GPA requirement.

*Credit intensity/completion.* Programs that require initial full-time attendance often, but not always, require that students maintain full-time status in subsequent semesters. Others specify enrollment intensity minimums below or above full-time status. Alternatively, programs can specify a minimum number of credits that must be completed over a time frame (e.g., 30 over a year). Depending on the number of required credits and the time allotted for completion, this could be more or less restrictive than a full-time requirement. Credit intensity requirements work in tandem with continuous enrollment rules and temporal restrictions to bound funded enrollment pathways. Such rules may be conceived as incentivizing timely completion, but whether they do so is an empirical matter. Nearly four-fifths (78%) of programs require that students enroll at or complete a given number of credits per semester or per year. Most (64%, or 201) set that requirement at 12 credits per semester, the standard threshold to qualify as a full-time student (e.g., for federal aid). Another 39 programs (12%) require credit-taking or accumulation but set the threshold lower than 12 credits (e.g., 9 or 6). Just six programs have stricter criteria (e.g., requiring 15 credits per semester or 30 per year). Credit requirements are more common among programs with stricter GPA requirements and are nearly universal among programs that require full-time initial enrollment (93%).

*Continuous enrollment.* Programs may require that students be continuously enrolled at an applicable college during major semesters (e.g., fall and spring). Strictly, this requirement is continuous with enrollment intensity, given that non-enrollment is effectively equal to zero credit enrollment. However, practically and organizationally these are separate matters. Programs can, for example, permit discontinuous enrollment but require full-time enrollment when a student is enrolled. 72% of programs (225) disqualify students who do not remain continuously enrolled. This requirement is less common at programs that are privately administered (41%) or funded (52%). It is also less common among programs without continuing eligibility credit requirements (29%) and that do not require initial full-time enrollment (42%).

*Community service.* We discussed community service as an initial eligibility requirement. Programs can also (or alternatively) require students to complete community service hours each year (or semester) that they are enrolled in college. This is true of just 31 programs (10%).

*Program reapplication.* Some programs require students to complete a new program application each year to maintain eligibility. Only 24 programs (8%) have such a stipulation.

*Additional procedural requirements for continuing eligibility.* Beyond FAFSA refiling, community service, and program re-application, programs may require students to negotiate additional procedures to maintain their award. As with initial requirements, these are often presented as “services” but may reduce the pool of awardees. The commonest are visiting an advisor (7%) or a college coach/mentor (4%) , attending a program workshop (5%) or other event (3%), completing a college success course (1%) or other specified course (3%), and applying for other scholarships (1%). Not including community service and refiling an application, 17% of programs impose at least one procedural requirement to maintain a scholarship, and 8% impose two or more.

*Post-graduation requirements.* Some programs require recipients to meet certain criteria *after* graduation in order to avoid the award’s conversion to a loan. We are only aware of such requirements for state programs (e.g. New York’s Excelsior Scholarship), and they all have to do with maintaining employment and in-state residency. The rationale is to ensure that taxpayers and the state recoup their investment in the student through payment of state income taxes.

## **Discussion**

We can see at least five major implications of the foregoing, the first of which is that local college affordability programs are structured by rules which are more complex and varied than

previous research has appreciated. Prior researchers correctly identified programs as varying in terms of what is provided (provision), where it can be used (applicability), and who can use it (eligibility). But provision, applicability, and eligibility are each complex *categories of rules*. Provision is a category containing (in our enumeration) 11 rules, even excluding rules regarding non-monetary benefit provision. Applicability is simplest, with four rules. Eligibility is a category containing 25 rules, 19 of which refer to initial eligibility conditions and 6 to conditions for continuing eligibility—and that ignores procedural requirement rules. These rules determine the size and destinations of the monetary transfers that make up each “program”. Grasping how this works requires looking *in detail* at program rules, and this is what we have done.

Given this complexity, we doubt whether programs can be easily compared, or placed along a continuous dimension, in terms of constructs like generosity (i.e., extent of provision) or universality (extent of coverage). It is possible, of course, to combine the variables measuring the rules we identify into scales, but whether there is meaningful covariance among these variables is an empirical question. There is also no clear answer to how these various variables (rules) should be weighted.

To be clear, rules by themselves provide limited information. One of the most crucial questions is: how much overall and per-student cost reduction does each program achieve? The rules we identify cannot, by themselves, permit us to do more than speculate here. We would also need to know the number and relevant characteristics of those the program comes to consider for eligibility, along with the price of potentially-covered expenses. Or, better, we need direct administrative data on program expenditures. To date, shockingly few studies have reported such information. Future researchers studying affordability programs should acquire administrative data on program awards whenever possible.

In a second major takeaway, we find indications that programs are constructed strategically to control expenditures, balancing the apparent generosity achieved through one or more rules by constrictions imposed through others. First-dollar awards are more generous, *ceteris paribus*, than are last-dollar. Similarly, an award that can be used to cover tuition, fees, and living costs is more generous than one restricted to tuition or tuition and fees. But first-dollar awards and those usable to cover additional costs tend also to impose award caps, often at low dollar amounts. Similarly, scholarships usable at four year colleges are much more likely to restrict eligibility by income. Such complex interplay of rules, of which we only scratch the surface, underscores our suspicion that meaningfully comparing programs in terms of generosity is not straightforward. We suggest that program designers sometimes choose rules strategically, with an eye to expenses, likely effects, and impression management. Such activity, we suspect, will occur less pervasively at wealthy programs—particularly (some) privately-funded scholarships. This of course is highly speculative, and requires much more research. We suggest that future research investigate program design processes through direct observation or post-hoc interviews.

The third major takeaway is that the programs which have merited the most attention, scholarly and otherwise, are highly unusual compared with the whole universe of local college affordability programs. A recent review of quantitative studies of free college programs (Monaghan, 2024) found that 26 of 47 studies of local programs (55%) focus on just six programs (the Kalamazoo Promise, El Dorado Promise, Pittsburgh Promise, New Haven Promise, Say Yes to Education-Buffalo, and Say Yes to Education-Syracuse), and that 34 of 47 (72%) covered programs usable at four-year colleges. These are all privately funded and operated programs which may be used (at minimum) at any in-state public two- or four-year college. There are just 22 programs which share these characteristics, and six of these have maximum awards of less than \$5,000 per year. Even among this elite group, the most studied

program (Kalamazoo) is an outlier. Along with the El Dorado Promise, it is a first-dollar full tuition guarantee applicable to four-year colleges. By contrast, 80% of programs are usable at only one college, 93% are last-dollar scholarships, 77% are either funded or operated by colleges, and 62% cannot be used at a four-year college. The modal program (165 of 314) is a last-dollar tuition guarantee to a single community college. It should go without saying that findings regarding the effects of the Kalamazoo Promise, or even the Pittsburgh Promise, will be largely uninformative about the effects of *most* local affordability programs.

Fourth, our research highlights the importance of state policy in the proliferation and structuring of local programs. California and Michigan have policies incentivizing the creation of local programs, and these states have two of the largest concentrations of such programs. We presented preliminary evidence that at least the California programs tended to be quite similar, and had features that are found nearly exclusively there (e.g., the provision of book/supply vouchers). Future research should explore how California's and Michigan's legislation influenced program design. We also found strong indications that local programs' decisions to include or exclude undocumented students was influenced by existing state policy. Specifically, inclusion of undocumented students, except by privately-funded programs, seems to occur mostly in states which extend aid eligibility and have a FAFSA alternative. Explicit exclusion of undocumented students seems to happen mostly in states with Republican legislative majorities. Again, this requires additional research, but it echoes recent research noting external influences on Promise programs' inclusion of the undocumented (Monaghan & Michaels, 2024). Future research should investigate political and other contextual influence on the creation and structuring of college affordability programs.

Finally, we draw attention to a major category of college affordability program: those operated by individual four-year public colleges. Such programs are in fact quite widespread (we count 73, 66 of which are full tuition guarantees), but have received virtually no scholarly attention

(except Gershenfeld, 2019). They are, after single-institution community college programs, among the commonest types of programs. We suspect they are overlooked because they do not fit existing conceptualizations. Since they have statewide eligibility, they are not “place-based” scholarships, a characterization which even vaguely fits most community college programs. But as they are restricted to single colleges, they are not state Promise programs (a la Tennessee Promise) or state merit grants (Florida’s Bright Futures). Such programs may also fail to inspire excitement given that they may be mostly re-allocating existing institutional aid (for a community college example, see Taylor & Lepper, 2019). Of course, whether colleges actually begin spending more in institutional aid when they begin funding a “free college” or other affordability program is an empirical question. To date, evidence on that score is sparse and mixed (Delaney & Hemenway, 2023; Li et al., 2025).

We suggest one further point. Some have claimed that college affordability (specifically, “Promise”) programs regularly provide additional support services, going so far as to claim that such services are a fundamental component of these programs. For example, Carlson and Laderman (2019: 8) claim that a Promise program “establishes and supports programs and services that are tailored to the unique needs” of a locality, and College Promise (2021:3) writes that “quality Promise programs acknowledge that support services and teaching excellence are critical to college quality and success” We found, conversely, that such services are rare. A review of statewide Promise programs found the same (Callahan et al., 2018). It is true that we classified as “procedural requirements” program elements that others would call “services”. Reclassifying all such requirements (e.g., to take success courses, meet with support staff, attend events, or complete planning documents) as services raises the number of “service-providing” programs to 166, or 49%--neither rare nor standard.

However, we caution researchers to recognize that whether *requiring* uptake of a service is beneficial to a student population is largely an empirical question. Consider some continuous

measure  $Y$  of benefit. We need to estimate, for a given program and service 1) the effect on  $Y$  service participation for those who would take it only if required (compliers), 2) the effect on  $Y$  of scholarship disqualification for non-compliers, and 3) the effect of requirement on uptake (the complier share). Requiring a service only increases  $Y$  on average if the effect of the service on compliers, times the effect of requirement on compliance, is greater than the effect of scholarship loss on non-compliers. It is very possible that in many cases this will not be the case.

## **Conclusions**

We present the first in-depth examination of the structure of local college affordability programs. Our data is available to other researchers upon request. We believe that our efforts are a considerable step forward for advancing scholarly knowledge of existing college affordability programs. Understanding the empirical distribution of program features can allow researchers to grasp, in broad terms, how typical a given program is, and therefore make a better guess at how credibly transferable findings from a studied program are to other programs. It will also assist us in making accurate statements about what college affordability programs consist of in the first place. Finally, it can assist us in beginning to discover why programs may vary in their effects. To be sure, the data requirements of this latter endeavor are immense, and variance in effects can also be due to variance in treated population and to random factors. However, understanding how the “treatments” vary is an essential first step.

We show that program design varies in a multitude of ways. Not all are necessarily impactful, but determining this is an empirical matter, and a very knotty one at that. One way that researchers could begin addressing such questions is to employ counterfactual analyses using administrative data. They can ask how many applicants would have qualified for a scholarship given one or more shifts in eligibility requirements, or how much money would have been



disbursed to qualifiers given changes in provision rules. This is essentially an accounting exercise, and it presumes a stable universe of applicants, though this assumption could be relaxed by assuming differently-sized effects of rule changes.

This brings us to another point. It is essential that we understand more about how programs come to have the designs they have. We cannot assume that programs are simply designed to benefit targeted populations as well as possible, and that therefore program variance reflects the different “needs” of various communities. Researchers should exercise curiosity on this score, seeking to “be in the room” when such discussions happen and reporting as accurately as possible what they observe. Doing so will help, not hurt, our knowledge of policy, and it will provide us with additional policy-relevant questions to ask.

We make one final, quite bold assertion. We believe that the framework we establish here, though ungainly, can be used (with modification) to study *any grant or scholarship*. With more modification, it may even be applicable to loan programs.

We support this by applying our framework to the most important aid program of all, the Pell grant. In terms of provision, the Pell grant is a first-dollar scholarship potentially usable to cover any college cost. It has no minimum award, but it has a yearly maximum award (this year it is: \$7,395); it is therefore not a tuition guarantee. Awards are scaled by income in combination with several other variables (combined into the Student Aid Index, formerly EFC), and vary by college, not just college sector. Pell grants cover a maximum of 12 semesters at full-time status. In terms of applicability, they are usable at any Title IV eligible college and are not restricted by program. In terms of eligibility, the Pell grant is an entitlement. It is unrestricted by residence, but is restricted to citizens and lawful permanent residents. There are no temporal restrictions, nor restrictions by student status, though one must enroll at 3 credits to receive funds. Eligibility is restricted by income, but not by academic performance. The procedural

requirement is to file an application (FAFSA) annually, and students may be required to comply with verification procedures. Continuing eligibility is restricted by academic performance (SAP).

Our framework spectacularly fails the test of parsimony, but achieves flexibility in return. Since we essentially just enumerate rules, one can always add another rule or more categories to an existing rule.

## References

- Anderson, C. (2021). Local-level, place-based scholarships: A review of the literature. *Educational Review*, 73(5), 638-661.
- Anderson, D. M., Monaghan, D. B., & Richardson, J. (2024). Can the Promise of Free Education Improve College Attainment? Lessons from the Milwaukee Area Technical College Promise. *Research in Higher Education*, 65(8), 1747-1770.
- Callahan, M. K., Kent, D. C., Meehan, K., & Shaw, K. (2019). *Affordability, access, and success: A framework for examining statewide college Promise programs*. Research for Action.
- Carlson, A., & Laderman, S. (2018). *The power of a promise: Implications and importance of adult Promise programs*. SHEEO Adult Promise Project. State Higher Education Executive Officers.
- College Board (2024). *Trends in college pricing and student aid 2024*. College Board.
- College Promise (2020). *Evolution of Promise: The evidence behind the movement: College Promise reference guide*. College Promise.
- College Promise (2021). *College Promise Catalogue of Local and State Programs: Fall 2021*. College Promise.

College Promise (2023). *College Promise Catalogue of Local and State Programs*. College Promise.

Custer, B. D., & Akaeze, H. O. (2021). A typology of state financial aid grant programs using latent class analysis. *Research in Higher Education*, 62, 175-205.

Czarnecki, K., Korpi, T., & Nelson, K. (2021). Student support and tuition fee systems in comparative perspective. *Studies in Higher Education*, 46(11), 2152-2166.

Delaney, J. A., & Hemenway, B. (2023). A difference-in-difference analysis of shifts in postsecondary institution spending patterns in response to “promise” financial aid programs. *Educational Policy*, 37(4), 1102-1150.

Dougherty, K. J., Nienhusser, H. K., & Vega, B. E. (2010). Undocumented immigrants and state higher education policy: The politics of in-state tuition eligibility in Texas and Arizona. *The Review of Higher Education*, 34(1), 123-173.

Fry, R., Braga, D., & Parker, K. (2024). *Is college worth it?* Pew Research Center.  
<https://www.pewresearch.org/social-trends/2024/05/23/is-college-worth-it-2/>

Fuller, M. B. (2014). A history of financial aid to students. *Journal of Student Financial Aid*, 44(1), 4.

Gershenfeld, S., Zhan, M., & Hood, D. W. (2019). The impact of a promise: A loan replacement grant, low-income students, and college graduation. *The Review of Higher Education*, 42(3), 1073-1100.

Iriti, J., Page, L. C., & Bickel, W. E. (2018). Place-based scholarships: Catalysts for systems reform to improve postsecondary attainment. *International Journal of Educational Development*, 58, 137-148

- Jones, Tiffany, Ramirez-Mendoza, Jaime, and Victoria Johnson. (2020) *A Promise worth keeping: An Updated equity-based framework for free college programs*. EdTrust
- Kofoed, M. S. (2017). To apply or not to apply: FAFSA completion and financial aid gaps. *Research in Higher Education*, 58, 1-39.
- Li, A. Y., Billings, M. S., Gándara, D., & Hu, X. (2025). Promise Programs and the Allocation of Institutional Expenditures at Community Colleges. *Community College Review*, 53(2), 192-225.
- Lincoln Y.S. & Guba E.G. (1985) *Naturalistic Inquiry*. Sage, Newbury Park, CA.
- Marken, S. (2024). *Costs leading reason college students are stopping out*. Gallup.  
<https://news.gallup.com/poll/646088/cost-leading-reason-college-students-stopping.aspx>
- Mettler, S. (2014). *Degrees of inequality: How the politics of higher education sabotaged the American dream*. Basic Books (AZ).
- Miller-Adams, M. (2015). *Promise nation: Transforming communities through place-based scholarships*. W.E. Upjohn Institute for Employment Research.
- Miller-Adams, M. (2021). *The path to free college: In pursuit of access, equity, and prosperity*. Harvard Education Press.
- Miller-Adams, M., Hershbein, B., Timmeny, B., McMullen, I., & Huisman, K. (2023). *Promise programs database*. W.E. Upjohn Institute for Employment Research.
- Miller-Adams, M. & J. Iriti (2022). *The free college handbook: A practitioner's guide to promise research*. W.E. Upjohn Institute for Employment Research.

- Miller-Adams, M. & McMullen, I. (2022). *Promise program design for equity outcomes: A landscape survey*. W.E. Upjohn Institute for Employment Research.
- Miller-Adams, M., & Smith, E. (2018). *Promise scholarship programs and local prosperity*. W.E. Upjohn Institute for Employment Research.
- Millet, C.M., Saunders, S.R., Kanter, M.J., & Heistand, R. (2020). Setting the stage: A history and overview of the college Promise movement. In L.W. Perna & E.J. Smith (Eds.) *Improving research-based knowledge of college promise programs* (pp. 17-30). AERA.
- Mishory, Jen. 2018. *The Future of Statewide College Promise Programs*. The Century Foundation. March 6.
- Monaghan, D. B. (2024). How powerful are promises? A comprehensive review of the causal mechanisms and outcomes of 'free college' programs in the United States. *Policy Reviews in Higher Education* 9(1): 1-34.
- Monaghan, D. B., Almanzar, C., Laughman, M., & Ritchey, A. (2024). *What Is a College "Promise" Program? The Creation and Transformation of a Concept, 2005-2022*. EdWorkingPaper No. 24-985. Annenberg Institute for School Reform at Brown University.
- Monaghan, D. B., & Attewell, P. A. (2023). College promise programs as symbolic politics. *Sociology of Education*, 96(4), 301-323.
- Monaghan, D. B., & Michaels, E. (2024). Empty Promises: Why and How Community Colleges Exclude Undocumented Students from "Free College" Promise Programs. *The Sociological Quarterly*, 1-22.

Organization for Economic Cooperation and Development (OECD) (2024). *Education at a Glance 2024: OECD Indicators*. OECD.

Perna, L. W., & Leigh, E. W. (2018). Understanding the promise: A typology of state and local college promise programs. *Educational Researcher*, 47(3), 155-180.

Perna, L.W. & Leigh, E.W. (n.d.). *Database of College Promise Programs*. University of Pennsylvania Alliance for Higher Education and Democracy.

Perna, L.W., Wright-Kim, J., & Leigh, E.W. (2020). Is a college promise program an effective use of resources? Understanding the implications of program design and resource investments for equity and efficiency. *AERA Open*.

Perna, L. W., Rowan-Kenyon, H., Bell, A., Thomas, S. L., & Li, C. (2008). A typology of federal and state programs designed to promote college enrollment. *The Journal of Higher Education*, 79(3), 243-267..

Swanson, E., Watson, A.R., & Ritter, G.W. (2020). Promises fulfilled? A systematic review of the impact of college promise programs. In L.W. Perna & E.J. Smith (Eds.), *Improving research-based knowledge of college promise programs*, (pp. 33-68). AERA.

Taylor, J. L., & Lepper, C. W. (2019). Designing the promise: The salt lake community college promise program. In *The Role of Student Affairs in Advancing Community College Student Success* (pp. 20-32). Routledge.

Upjohn Institute (2021). *Promise research bibliography*. W.E. Upjohn Institute for Employment Research.

WestEd (n.d.). *Active college promise programs in California*.

<https://californiacollegepromise.wested.org/programs/>

Willemse, N., & De Beer, P. (2012). Three worlds of educational welfare states? A comparative study of higher education systems across welfare states. *Journal of European Social Policy*, 22(2), 105-117.

## Tables

Table 1. Infrastructural characteristics of local Promise programs (N=314)

	Number	%
<i>Founding year</i>		
Before 2005	8	2.6
2005-2010	48	15.3
2010-2014	35	11.5
2014-2019	168	54
2020-2024	55	17.5
<i>Location</i>		
California	93	29.6
Texas	37	11.8
Michigan	16	5.1
North Carolina	16	5.1
Wisconsin	14	4.5
Illinois	13	4.1
Other states	125	40
<i>Funding</i>		
1-3 private donors	40	12.7
Multiple private donors	41	13.1
College/university	118	37.6
State/local government	115	36.6
<i>Administration</i>		
Nonprofit organization	55	17.5
College/university	240	76.4
State/local government	19	6.1



Table 2. Provision rules for local Promise programs (N=314)

	Number	%
Last-dollar	293	93%
<i>Award applicability</i>		
Tuition only	108	34%
Tuition & fees (T&F)	148	47%
More than T&F	58	18%
Minimum award	21	6%
Book/supply voicher	42	13%
Maximum award	48	15%
Scaled award	33	11%
<i>Years covered</i>		
Fewer than 2	11	4%
2 years	161	55%
between 2-4	28	9%
4 years	98	31%
Greater than 4	15	5%
<i>Expense guarantee</i>		
Community college only	184	59%
Four-year only	71	27%
Either	14	4%
No tuition gurantee	45	14%

Table 3. Applicability rules for local Promise programs (N=314)

	Number	%
<i>Extensiveness</i>		
Single college	253	81%
Multiple, less than in-state	31	10%
In-state	19	6%
More than in-state	11	4%
<i>Sector/control</i>		
Community college only	194	62%
Four-year only	79	25%
Either	41	13%
Private college	37	12%
Program restriction	5	2%

Table 4. Initial eligibility rules for local Promise programs (N=314)

	Number	%
<i>Geographic</i>		
Locality	168	54%
State resident	144	46%
National	2	0%
Residence length	69	22%
Some temporal restriction, not immediate	61	19%
Immediate enrollment	83	26%
First-time, first-year	77	25%
<i>Citizenship</i>		
No citizenship restriction	167	53%
DACA only (explicit)	4	1%
FAFSA completion (implicit DACA)	97	31%
Pell eligibility (implicit exclusion)	27	9%
Citizen/LPR (explicit exclusion)	19	6%
<i>Income</i>		
No income requirements	213	67%
Income greater than Pell	20	6%
Any Pell eligible	51	16%
Less than Pell	30	10%
<i>Academic/merit</i>		
Regular HS grad	124	39%
On-time HS grad	17	5%
HS test	18	6%
HS attendance	17	5%
HS GPA 2.0/less	30	10%
HS GPA 2.1-2.9	33	11%
HS GPA 3.0+	25	8%
Any academic requirement	156	50%
Full-time college	214	68%
Community service	15	5%
Program application	161	51%
FAFSA	300	96%
Early commitment	16	5%
Moral criteria	16	5%

Additional procedures: 1	51	16%
Additional procedures: 2	44	14%
Additional procedures: 3+	15	5%

Table 5. Continuing eligibility rules for local Promise programs (N=314)

	Number	%
<i>College GPA</i>		
No requirement	79	25%
SAP or 2.0	185	59%
Greater than 2.0	50	16%
<i>Enrollment intensity</i>		
No requirements	68	22%
1-11 credits	39	12%
12 credits	201	64%
Greater than 12	6	2%
Community Service	31	10%
Re-file program application	24	8%
Continuous enrollment	225	72%
Additional procedures: 1	28	9%
Additional procedures: 2+		6%