

This FAFSA accountability example was selected because it is a relatively niche federal policy issue unlikely to inspire similar submissions. The goal is to show you *how* to write a strong memo, not *what* to write about. Choose your own federal systemic issue and apply the same analytical rigor and writing standards demonstrated here.

MEMORANDUM

TO: Secretary, U.S. Department of Education

FROM: Student Policy Analyst

DATE: February 2026

RE: Establishing a Federal FAFSA Completion Baseline Requirement for High Schools Receiving Title I Funding

THE PROBLEM

Each year, eligible high school students leave billions of dollars in federal Pell Grant aid unclaimed because they do not complete the Free Application for Federal Student Aid (FAFSA). The high school class of 2024 left \$4.4 billion in unclaimed Pell Grants on the table, representing approximately 830,000 Pell-eligible students who never applied for them. Nationally, only about 50–58% of high school seniors complete the FAFSA by graduation, meaning nearly half of all students—disproportionately those from low-income, Black, and Latino communities—forgo access to federal financial aid that could make postsecondary education affordable.

The root cause is structural: high schools face no federal accountability for ensuring students apply for aid, even though the federal government invests heavily in those schools through Title I funding to support disadvantaged students. While some states have adopted mandatory FAFSA completion policies with exemption processes, most have not, and completion rates remain stagnant or declining in states without such policies. The problem is compounded by limited school counselor capacity, lack of prioritization by school leadership, and insufficient federal guidance linking Title I objectives—improving outcomes for low-income students—to actionable FAFSA completion support.

WHY FEDERAL INTERVENTION IS NECESSARY

FAFSA completion directly determines access to federal aid programs, including Pell Grants, federal work-study, and subsidized loans. Because these are federal programs funded by federal appropriations, the federal government has both the authority and the responsibility to ensure eligible students can access them.

Federal intervention is essential because:

1. **Interstate equity:** State-level FAFSA policies vary widely. Seven of the top 10 states with the highest FAFSA completion rates have universal FAFSA policies, while others have none. Federal baseline standards would eliminate geographic disparities in students' ability to access federal aid.
2. **Alignment with Title I goals:** Title I of the Elementary and Secondary Education Act provides over \$18 billion annually to schools serving low-income students, yet these schools often have the lowest FAFSA completion rates. Federal action can require schools receiving Title I funds to demonstrate they are actively connecting students to the federal financial aid that those funds are meant to help them access.
3. **Proven impact:** States with universal FAFSA policies—requiring students to complete a FAFSA or request an exemption to graduate—show dramatically higher completion rates. Oklahoma, for example, saw a 49.4% year-over-year increase in FAFSA completions after adopting such a policy.

RECOMMENDED POLICY ACTION

The Department of Education should issue new Title I regulations requiring that, as a condition of receiving Title I funding, high schools must:

1. **Achieve a minimum FAFSA completion rate** of 70% of graduating seniors, phased in over three years (50% year one, 60% year two, 70% year three). This baseline aligns with completion rates in high-performing schools and states.
2. **Provide students and families with an opt-out process:** Schools must offer a simple, written exemption request process for families who decline to complete the FAFSA, ensuring the policy respects family choice while establishing school accountability.
3. **Report annual FAFSA completion data** to the Department of Education, disaggregated by income level and race/ethnicity, to monitor equity and identify schools needing additional support.
4. **Receive federal technical assistance and resources:** The Department of Education should provide grant funding for schools to hire FAFSA completion coordinators, host family completion events, and integrate FAFSA support into school counseling programs.

IMPLEMENTATION CHALLENGES AND MITIGATION

Challenge: Schools may lack staff capacity to support FAFSA completion. *Solution:* Pair the mandate with competitive federal grants for schools to hire dedicated FAFSA coordinators or contract with nonprofit college access organizations for on-site support.

Challenge: Families may resist due to privacy concerns or fears about immigration status. *Solution:* Federal guidance should clarify that completing the FAFSA does not require disclosing the information of undocumented family members, and that the opt-out process protects family autonomy.

Challenge: Technical issues with the FAFSA form itself may depress completion rates. *Solution:* Require the Department of Education to release annual FAFSA performance reports and adjust completion targets during years with documented federal technical failures (e.g., the 2024–25 cycle).

CONCLUSION

High school students—particularly those from low-income families—are leaving billions of dollars in federal aid unclaimed each year, not because they are ineligible, but because their schools are not held accountable for connecting them to federal programs. Tying Title I funding to baseline FAFSA completion standards is a low-cost, high-impact reform that aligns federal K-12 investment with federal postsecondary access goals and ensures every student has a fair opportunity to afford higher education.