Research Findings and Federal Higher Education Policy: The Case of the Pell Grant Quality Control Report

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RESEARCH FINDINGS AND FEDERAL HIGHER EDUCATION POLICY, The Case of the Pell Grant Quality Control Report

Introduction

Increasingly, higher educational practitioners, policy analysts, and researchers are faced with the task of interpretation of research findings which are presented as the bases of new or revised Federal policy in higher education. Commonly, these findings are presented initially in an abridged or summarized form which does not allow for informed judgement of the quality of the research or of the logical derivation of the implications for policy. As a result, the higher education community is placed at an immediate disadvantage in policy deliberations. This initial disadvantage is often transformed into a permanent one in those cases where policy deliberations are concluded before full access may be gained to the research documentation and before alternative judgements and assessments can be formed and disseminated.

The role of research in policy making is one of the central controversies among the academic, bureaucratic, and political constituencies. Gladieux (1983) has pointed out that the connection between social research and public policy -- or, more importantly, the lack of such
connection -- is frustrating for all participants to the process. He notes that the source of these frustrations lies in the unrealistic expectations that each group has for the other.

Another source of frustration has been the increasingly common use of semantic tools as weapons in the policy debate. Examples of such use exist in politics (O'Neill, 1981), law (Danet, 1980), sociology (Turner and Edgley, 1980), and throughout the economic analysis of education. The semantic tool has been shown to be especially powerful when used in the context of an emotionally charged issue (see the example of President Kennedy versus the Steel Industry presented in Godden and Maidment, 1980).

The use of research findings as a form of pre-emptive attack and semantic distortion as a means to bias a policy debate occurred most recently in the higher education sphere as the Federal government moved in 1982 to devise and justify a system of expanded validation for the Federally financed higher education student assistance programs. Under pressure from its own Inspector General for improved program management and from the Office of Management and Budget (OMB) for cost reductions, the U.S. Department of Education had contracted in 1980 for a study
of the Pell Grant award system. The Office of Student Financial Assistance (OSFA) of the Department of Education awarded a quality control research contract to Advanced Technology, Inc. (who subcontracted major parts of the research to Westat, Inc.) These organizations were asked to analyze the major types of error found in the Pell Grant award system, to determine the probable causes of the errors, and to recommend remedial actions to reduce future errors (Advanced Technology, 1982). The result was the report entitled 'Quality in the Basic Grant Delivery System' (hereafter referred to as the QC Report).

Increasingly during the late 1970's, criticism had been directed against a variety of Federal grant and loan programs for university students. Ironically, it was, in part, the projected fiscal impact of the Middle Income Student Assistance Act (considered at the time as a great victory for the higher education lobby) which appears to have heightened the attention received by the Federal financial aid programs. On May 11, 1979, a study by the Office of the Comptroller General was published as a report to Congress. In the report, the Pell Grant (then entitled Basic Educational Opportunity Grant) program and the three campus-based aid programs -- Supplemental
Educational Opportunity Grants, College Work-Study, and National Direct Student Loans -- were criticized for distributing aid inconsistently to students in similar situations.

The financial aid controversy became even more severe during 1981 and 1982 as the concomitant need to reduce projected Federal budget deficits increased at the same time charges of fraud and abuse in program management were cited (the Office of the Inspector General of the Department of Education issued 4,811 audit reports in FY 1981 in which total costs disallowed or questioned in Pell and campus-based programs totaled $25.3 million). These charges began to be cited as possible justifications for reduction or elimination of certain of the Federal student aid programs. These issues concerning the provenance of the higher education student assistance controversy are stressed here because the political effect of the QC Report and the manner in which it was disseminated can only be appreciated adequately when one has a feeling for the extent estrangement which had grown between the higher education financial aid community and certain sections of the Federal bureaucracy.

The asserted "findings" of the QC Report became, through frequent repetition in speeches, press releases,
and news reports, common knowledge among the concerned professionals before access to the actual report was made possible. The "Executive Summary" of the Report states dramatically that "The findings indicate substantial dollar error in awards to students during the 1980-81 academic year." In more detail, the QC Report notes that:

--- The total dollar error in the program averaged $275 per student recipient for a total of $650 million or 30% of total funds awarded;

--- Seventy-one percent of all recipients received an incorrect award;

--- $526 million was overawarded and $124 million was underawarded;

--- Forty percent of the errors were in excess of $150, and thirty percent in excess of $250;

--- Nineteen percent of those receiving Pell Grants should have received no award at all;

--- $181 million in overawards resulted from institutional error alone; and

--- Correct figures of Aggregate Gross Income on financial need determination documents would have decreased the net overaward to $549 million.

The purpose here will be to review the policy analysis issues involved within the QC Report and to ascertain the validity of these findings as they were reported. In review of a document such as the QC Report it is normally necessary to examine three major topics:

--- The design and implementation of the study,
--- The derivation and presentation of the findings, and

--- The relevance of the findings to the policy recommendations which are made.

The QC Report represents the initial year's product of what is contracted to be a three-year project. The researchers selected as their data base a sample of 305 public, private, and proprietary institutions. An average sample of fifteen Pell Grant applicants' files were selected from each institution for a total sample of approximately 4500 students. For the sample students, financial and other relevant family information was collected from the students and their families or guardians. In addition, students and their families or guardians were requested to supply permission for the researchers to obtain corroborative information from the Internal Revenue Service, financial institutions, and local property tax assessors. This detail is available only for a relatively small subset of the original sample.

As with any study of this scale and complexity, the issues of sampling bias deserve attention. However, for the purposes of this paper the basic methodological debate can be bypassed. The statistical techniques are well within the normal professional standards for such survey work and, as will be indicated below, it is not the statistical results of the study, but their presentation and interpretation that are the major methodological
concerns with the QC Report.

The derivation and presentation of the report is based upon a definition of "error" in the program as any difference between the total of the recorded actual plus planned disbursement of aid funds (measured in the Spring) and the amount which researchers determined should have been disbursed to students. The latter amount was calculated by the researchers based upon a "validated" student eligibility index (SEI), and upon Spring records of costs and enrollment status. From this definition of Pell Grant program "error", one can identify three locations where researcher "error" could occur. First, recorded disbursement data in the Spring may not be current or may be inaccurate for some other reason. Second, the researcher's "validated" SEI measure may not be superior (more accurate) than the one used by the financial aid office. And three, the data recorded for costs and enrollment status may not be current or may be inaccurate for some other reason. Given the range and number of responsibilities of university, college, and proprietary institutions' financial aid offices it would not be surprising if the Spring posting of data on student files was outdated (or even inaccurate in some number of cases). Thus error types numbers 1 and 3 are very real sources of possible researcher misconception.
of the actual eligibility of a student for Pell Grant funds. A more probable, and potentially far more serious source of researcher error, however, is the calculation and use of the validated "SEI".

The researchers used the detailed data collected from students, families and guardians, financial institutions, and the IRS and property tax assessors to create their own SEI. Any variation between this amount and the Fall SEI used by institutions for planning disbursements would result in a program "error" being identified. This approach can be critiqued on three levels.

First, there is the issue of terminology. The researchers have certainly found "differences"; they may even wish to call them "discrepancies"; but the use of the phrase "error" indicates either an ignorance of the value laden impact of that term and its connotation of fraudulent behavior on the part of participants in the program or else a purposeful intention to create and/or promote controversy upon emotional rather than analytical grounds. In either case it represents a violation of academic restraint and precision and reflects very poorly upon the individuals and organizations involved in preparation of the report.
The importance of the debate over the "semantics" of this report should not be underestimated. The mind-set implied by use of such terminology is an indication of the seriousness of the estrangement which existed in 1982 between the Federal bureaucracy and the populations of aid officers and aid applicants. In justifying use of the term "error", a defender of the QC Report noted the sports analogy of a baseball player who commits an error. No one assumes the error is purposeful and the authors of the report, it was claimed, did not mean to suggest the applicants committed the SEI errors on purpose.

This argument misses the key point. The objection to the use of the term "error" was not on the basis of implied purposefulness, but of implied culpability. To extend the analogy, "errors" in baseball are charged only if the player is responsible, that is, if the player should have been able to make the appropriate play. In the highly complex financial aid application system it seems insensitive if not spurious to blame the low-income parent for an inability to satisfy the data requirements of a system which is more complex than that of the I.R.S. The very students and parents most likely to apply for Pell Grant assistance are the ones most likely, because of past and
extant educational and social disadvantage, to have difficulty in accommodating to the complex and arbitrary demands of the student assistance income reporting and documentation requirements. The errors which result are largely of improper system design and imputations of neither purposefulness nor culpability should be assessed against the applicant population.

To return to the non-semantic issues of the QC Report, where differences do occur (by researchers' definition) the researchers are under a burden to support why they feel the revised figures are, in fact, superior to those reported by the applicants. Certainly, the tax appraiser figures are one example where one individual's subjectivity (that of the parent or student) simply is replaced by that of another individual (the appraiser). The professionalism of appraisers notwithstanding, this substitution cannot be justified on any prima facie grounds given the number of discretionary decisions in a property valuation estimate. Even the report admits that "in certain instances" the revised SEI data represented "judgement calls by the project analysts." Why should the project analysts' "calls" always be considered as more accurate?
Finally, there is a programmatic issue in terms of validating Fall data (supplied by the student the previous Spring or Summer) by means of data collected for the subsequent Spring. The QC Report does not make clear the safeguards to ensure that the financial, personal, and academic data were targeted to a restricted time. This is an especially serious problem since some applicants, in an attempt to provide the most timely data, will report expected incomes on their forms. To find, in 1981, that an applicant's relevant income is not identical to what they predicted one year earlier is no surprise. To restrict the use of expected incomes may be a possible solution but it will, as any financial aid officer or scholar could have told the researchers, introduce new biases into the aid system.

These flaws in the QC Report still represent only a minor part of the potential misrepresentation of the results as findings of "error". Even if one accepted all of the results as given, alternative formulations would exist for their interpretation. This becomes obvious when one studies the researcher's attempts to partition "error" by source, student or institution. The partitioning was done by calculating the part of the differences (in actual plus planned awards and the researchers' estimate of the appropriate awards) which was due to incorrect information
supplied on the application (student error) and the part of the differences due to administrative or technical error on the part of the educational institution. Thus, "institutional error" is any residual difference not accounted for by the discrepancies between original application data and follow-up data obtained by the researchers.

As is noted in Figure 1 (taken from Figure 1-1 in Volume 1 of the QC Report) seven sources of error were identified,-- one form of student error and six of institutional error. In every case the error represents the amount of the Pell Grant award which the researchers treated as either an over- or underaward. The "sum of all errors" row includes an amount greater than the total of the columns because some aid recipients were said to have more than one type of error.

The amount of student error, calculated from revised SEIs for each student in the sample, are acceptable only to the extent that one accepts the researchers' calculations of applicant characteristics as superior to that provided by the applicants themselves. When one studies the sources of institutional error an even greater problem of acceptance arises. One
**FIGURE 1**

**THE SEVEN TYPES OF ERROR**

<table>
<thead>
<tr>
<th>ERROR TYPE</th>
<th>ESTIMATED ABSOLUTE DOLLAR DISCREPANCY ASSOCIATED WITH THIS ERROR</th>
<th>ESTIMATED % OF RECIPIENTS WITH THIS ERROR</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Student error</td>
<td>$352 million</td>
<td>41%</td>
</tr>
<tr>
<td>2. Bachelor's Degree or Citizenship Error</td>
<td>$3 million</td>
<td>0.2%</td>
</tr>
<tr>
<td>3. AEP or FAT Error</td>
<td>$169 million</td>
<td>7.7%</td>
</tr>
<tr>
<td>4. Program Eligibility Error</td>
<td>$25 million</td>
<td>1.3%</td>
</tr>
<tr>
<td>5. Cost of Attendance Error</td>
<td>$63 million</td>
<td>15.0%</td>
</tr>
<tr>
<td>6. Enrollment Status Error</td>
<td>$94 million</td>
<td>18.2%</td>
</tr>
<tr>
<td>7. Calculation Error</td>
<td>$29 million</td>
<td>15.6%</td>
</tr>
<tr>
<td><strong>Sum of All Errors</strong></td>
<td><strong>$681 million</strong></td>
<td><strong>71%</strong></td>
</tr>
</tbody>
</table>

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1 Individual recipients may have more than one type of error. Therefore, individual error rates do not add up to the total.
finds that the Report has labeled as error a variety of technical and bureaucratic requirements which were not fulfilled by the aid offices. For example, the failure to have on file a copy of the AEP -- affidavit of educational purpose (a statement that all funds received will be used for educational purposes and that the student is not in default on any educational loan obligations) or FAT -- financial aid transcript (for all transfer students) would mean that the total award to the affected student would be considered as disallowed!*

Thus $169 million in error is solely attributable to failures in documentation. In fact, the documentation may have been available but not on file at the time of the researchers' institutional visits or may have been obtained after those visits. These requirements of the Pell program are of controversial value in themselves (certainly, neither acts as a major check on potential fraud or abuse) but even if they are programatically appropriate it is unacceptable for a policy researcher to classify such discrepancies so at to present all awards to such students as erroneous.

*Failure to have an FAT on file meant that any disbursement after the initial disbursement was disallowed.
The other sources of institutional error (as identified in Figure 1) are as follows:

a) Bachelor's Degree or citizenship error - students who are found not to be citizens or eligible non-citizens or who already hold a bachelor's degree;

b) Program eligibility error -- students whose academic programs do not meet the requirements of being at least one-half time, or a minimum of six months in duration, showing satisfactory academic progress, or being in default on a loan or grant at any institution previously attended;

c) Cost of attendance error -- awards were recalculated based upon researcher estimates of institutional costs; any difference with original financial aid office figures which resulted in an over- or underaward was treated as a program error;

d) Enrollment status error--awards are supposed to be prorated according to a student's time status, i.e., half, three-quarter or full-time: the researchers used Spring records to determine the student's actual status and contrasted this with the basis used in the award process;

e) Calculation error -- any discrepancy between the sum of planned and actual awards and the amount recorded as the award was considered an error without regard to the source of the discrepancy.

All of these forms of error, with the exception of degree or citizenship error, are subject to question. The consistent weakness of the QC Report lies in its inability or unwillingness to detail why such discrepancies resulted. Is program eligibility error a result of malfeasance or misfeasance on the part of aid administrators
or, as is much more probable, a difficulty arising from the timing and sequencing of data collection and aid dissemination? The QC Report never differentiates between apparent error (from bookkeeping or filing oversights or a difference in program requirements interpretation) and administrative failure to implement program safeguards. The report itself notes that (p. 1-15, Volume 1):

Though we understand that institutional information from Section 3 of the SER, since it is not always updated, does not in many cases reflect the latest award computation and disbursement amount of a student's award, it is the only record available to us. (emphasis added).

In fact, the SER is not the only record available; the researchers could have confirmed the findings with the aid officers and attempted to reconcile or find the reasons for the discovered discrepancies. This undoubtedly was viewed as excessively expensive but it is noteworthy that at no other place in the Report -- and certainly not in the Executive Summary -- is their a similar caveat about the potential misinterpretation that could result from this manner of data collection and specification and the significance of the misinterpretation for policy purposes.

The QC Report goes on to make seven recommendations for improving data collection from applicants, six corrective
actions for institutions, and thirteen recommendations for data processors (the last is an intriguing non sequitur since the QC Report itself finds "no major causes of error" in processor procedures).

The presentation of these remedial suggestions is indicative of another important weakness in the QC Report. The normal approach to the issue of program reform is in terms of the marginal benefits and costs from each sequential corrective action. By presenting the recommendations as part of a fixed package the QC Report indicates an assumption of zero marginal cost for each of the remedial steps proposed; this is exceedingly unlikely.

From Research to Policy

Any reform of the Pell Grant system policies must take into account two major considerations: cost and timing. The QC Report has been used by the OSFA as a basis for demanding increased verification from applicants. To be cost effective the expense of any data verification exercise must be less than that error amount (including equity effects) which results from lack of that form of verification. Also, cost efficiency for the Federal agencies should not be obtained by shifting of a greater part of the cost burden to the institutions or students unless this is an explicit policy step desired by the government.
The issue of timing is crucial because unlike the QC researchers, aid officers cannot wait until the Spring of the year to determine a student's eligibility for the previous Fall. The aid officers must work with the best data available at the time. It is possible -- but perhaps not practical -- to imagine all Pell Grants made before Spring verification as being provisional. However, there would be serious problems with collecting overaward amounts and the corrections for underawards would often be too late to affect a student's educational decisions.

If one studies Figure 2 (Figure 3-9 from Volume 1) it is obvious that income, assets, and demographic information dominate the list of error sources. The use of assets in the need determination process is a controversial issue among financial aid experts and one which is likely to be a prohibitive area for remediation in terms of verification costs. Family size and sibling higher educational attendance are forms of data obtainable in a cost effective manner only from the applicant. Income data improvements however, can be obtained from the
### FIGURE 2

THE RELATIVE IMPACTS OF ERRORS IN BEOG APPLICATION ITEMS ON TOTAL GRANT DISBURSEMENT ERROR

<table>
<thead>
<tr>
<th>APPLICATION ITEM</th>
<th>RESULTING AWARD ERROR (NET IN MILLIONS)¹</th>
<th>RESULTING INCREASE IN AWARDS PER STUDENT (NET)²</th>
<th>RANK</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adjusted Gross Income</td>
<td>$101</td>
<td>$43</td>
<td>1</td>
</tr>
<tr>
<td>Income, 1979 (Student + Spouse)</td>
<td>43</td>
<td>18</td>
<td>2</td>
</tr>
<tr>
<td>Home Equity</td>
<td>38</td>
<td>16</td>
<td>3</td>
</tr>
<tr>
<td>Household Size</td>
<td>33</td>
<td>14</td>
<td>4</td>
</tr>
<tr>
<td>Assets (Student + Spouse)</td>
<td>26</td>
<td>11</td>
<td>5</td>
</tr>
<tr>
<td>Nontaxable Income (Other Than Social Security)</td>
<td>22</td>
<td>9</td>
<td>7</td>
</tr>
<tr>
<td>Investment Equity</td>
<td>14</td>
<td>6</td>
<td>8</td>
</tr>
<tr>
<td>Number in Postsecondary Education</td>
<td>14</td>
<td>6</td>
<td>9</td>
</tr>
<tr>
<td>Cash/Savings/Checking</td>
<td>8</td>
<td>3</td>
<td>10</td>
</tr>
<tr>
<td>Business Equity</td>
<td>7</td>
<td>3</td>
<td>11</td>
</tr>
<tr>
<td>VA Educational Benefits, Monthly</td>
<td>2</td>
<td>1</td>
<td>11</td>
</tr>
<tr>
<td>Taxes Paid, 1979</td>
<td>0</td>
<td>0+</td>
<td>12</td>
</tr>
<tr>
<td>Marital Status, Student</td>
<td>0</td>
<td>0+</td>
<td>13</td>
</tr>
<tr>
<td>Social Security Income, 1979</td>
<td>0</td>
<td>0+</td>
<td>14</td>
</tr>
<tr>
<td>Medical/Dental Expenses</td>
<td>-1</td>
<td>0−</td>
<td>15</td>
</tr>
<tr>
<td>Earned Income (Head of Household)</td>
<td>-1</td>
<td>0−</td>
<td>16</td>
</tr>
<tr>
<td>Tuitions</td>
<td>-2</td>
<td>-1</td>
<td>17</td>
</tr>
<tr>
<td>Earned Income (Spouse)</td>
<td>-2</td>
<td>-1</td>
<td>18</td>
</tr>
</tbody>
</table>

¹For policy purposes, the data from our sample are extrapolated to program-wide error levels. Note that there is substantial overlap of error amounts, so column total is larger than actual total student error. Data are rounded to the nearest million.

²Data are rounded to the nearest dollar.

³Includes estimates of error drawn from tax data for students found to have filed under the incorrect dependency status.
requirements that applicants supply validation in terms of 1040 tax form copies or some alternative means of verification if no 1040 form has been filed for the year in question.

From the beginning of the QC Report debate, it was obvious that the Department of Education desired a program of requiring all applicants to validate their income. Each eligible Student Aid Report (SAR) generated for the Fall, 1982, population of applicants included a message indicating the applicant would have to submit a copy of the 1040 (or equivalent documentation) to the financial aid administrator. The Department proceeded with these efforts even though Congress had never appropriated funds for processing the validation activity (and the House of Representatives twice refused to grant a funding request for this purpose).

In mid-June, 1982, the Department finally had to abandon the idea of 100 percent validation and discontinued the SAR validation message. As an alternative, the
Department returned to its previous system of conducting validation on the basis of an error prone profile established by an edit check system.

By the end of the summer of 1982 the financial aid officers remained uncertain as to which applicants were to be validated and, for those to be validated, what data items on the application were to be validated. The Department requirements posited simultaneous instructions that only "adjusted gross income" and "taxes paid" would be required but that any information on a tax return that is in conflict with SAR data is a required validation item. The final 1982-83 Pell Grant validation requirements required a 40 percent sample of applicants with the sample drawn on the basis of three formats: a random sample, a sample of error-prone applications, and a sample of files which could be matched with social security files. For 1983-84 and beyond the Department of Education's validation process will be extended more systematically to the other Federal student aid programs.

It is interesting to note that of all of the items discovered in the QC Report as a basis for possible discrepancies only those of income and taxes paid will be validated. The skeptical policy analyst might be led to
suspect that the government sought the QC Report not to identify whether a problem existed and its nature and dimensions but rather sought additional justification so as to implement a policy which was based on anecdotal evidence and hearsay. Certainly, there is little connection between the report findings and the final validation policy other than that the QC Report was used as ammunition in Congress and in dealings with the financial aid community so as to facilitate implementation of the preconceived validation plan.

Thus a question arises in tracing this history of the linkage between research and policy as to the actual provenance of the Department of Education's emphasis on the validation alternative. On November 19, 1981 a Department news release quotes comments from Secretary T. H. Bell as follows:

The findings of this study (a preliminary version of the QC Report) confirm our suspicion that far too many Pell Grant recipients are receiving incorrect amounts. The root of the problem is that unlike most other need-based Federal programs, we generally accept on faith the information provided by students and parents on student aid applications. The vast prevalence of overawarding is proof that we must strengthen dramatically our procedures for verifying the accuracy of student information.

The statement is interesting in many respects not the least of which is its admission of the role of the QC Report (which
at this stage was extremely preliminary and was, in fact, still not considered in acceptable final form even by OSFA staff) in confirming rather than originating the need for a new validation policy.

However, even if, as may be the case, the Department of Education has full confidence in the findings of the QC Report and this confidence is the basis for expanded validation requirements, what should these requirements be? Initially one must recognize two limitations of any validation policy. First, neither error prone edit checks nor comparisons with 1040 forms will identify the sophisticated cheat. Someone that lies on their financial aid application will be caught only if they did not lie as much or in the same manner on their 1040 form. Thus we will document primarily wage and salary underreporting since wages and salaries are the only secure form of income reporting even on 1040's. This creates a bias in validation which is in favor of those groups with the greatest amount of non-wage and salary income.

This income class bias in validation is compounded by the finding by Olivas (1982, 1983) that low income applicants may actually be more likely to overreport than to underreport income data. Thus the validation
process may increase compliance costs on the very population least likely to abuse the system. To this conclusion, one may add the fact that among all aid eligibles, the lower one's income, the less impact an income reporting error will have on the actual award one will receive.

The second major limitation of the present validation process is that it has no disincentive impact since the worst that can happen to an applicant is to have their award reduced to the level it would have been without the misreported data. With no explicit sanctions for misrepresentation of data, a major moral hazard will continue to exist regardless of the system of validation.

It should be noted that, despite its strident tone, the QC Report provides not a single piece of evidence of premeditated misreporting or abuse on the part of any student or aid administrator within the Pell Grant system. It is doubtful that a program of this size could exist without some degree of fraud or abuse, but the QC Report fails either to identify it or provide for suitable corrective action. However, the findings of the QC Report should alert the aid community to the problems inherent in the continued use of uncorroborated applicant data and of the
problems of matching the timing of information acquisition and aid disbursement. The most reasonable conclusions that can be drawn from the Report and the political controversy surrounding it are:

1) that the aid application form is excessively complicated even for many of its socially and educationally advantaged users;

2) that applicant assistance rather than policing is the primary need in terms of data item validation; and

3) that full verification is impossible within the financial and time constraints of the present aid process.

The Department should see that the ongoing research agenda be focused on the following issues:

1) simplification of the data requirements and possible exclusion of such problem areas as asset inclusion and multi-year income alternatives;

2) how increased counseling services can be provided (perhaps at the high school level for initial applicants) so as to reduce the number of data inconsistencies;

3) how error-prone sampling can be designed so as to minimize the burden on lowest income applicants and yet provide a check on the higher income applicants where reporting discrepancies have the greatest effect on award levels; and

4) shifting of the timing of validation to a lagged year format so that the validation process has the minimal effect on access and choice decisions of minority students.
These issues appear to be of greater import within the general scheme of higher education student assistance than do the more sensational, albeit less substantial, policy products generated by the QC Report.
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