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Department of Education
Office of the Secretary
400 Maryland Avenue, SW
Washington, DC 20202

Submitted via [regulations.gov](https://www.regulations.gov)

Re: FAFSA Revisions, FR Document #2023-06169

Dear Secretary Cardona and Department of Education Staff:

Thank you for your service and leadership to our nation and for the opportunity to submit comments as requested by the Department of Education (ED) regarding FAFSA revisions. If the proposed revisions occur, as we believe they should, we welcome the opportunity to provide further input to assist in this important task.

We submit this letter on behalf of Evermore, a national nonprofit dedicated to improving the lives of bereaved children and families. Evermore was founded to help raise awareness of the consequences of bereavement on society, advance sound research that drives policy and program investments, and advocate on behalf of bereaved and orphaned students, including those who use the FAFSA form to submit critical financial information necessary to receive financial aid and matriculate into postsecondary education.

Evermore applauds all ED stakeholders for determining revisions to the FAFSA were warranted, particularly the revisions pertaining to orphanhood. Over 13 million students rely on the FAFSA form to determine their eligibility for federal, state, and institutional aid. These applications amount to over \$120 billion in aid being distributed to students in need via grants, low-interest loans, and work-study programs.¹ Indeed, FAFSA has increased access to higher education, with an estimated 70 percent of undergraduates filing a FAFSA application,² yet many barriers continue to exist for those from traditionally underprivileged and marginalized backgrounds. As data reveal, when these demographic factors intersect with the hardships inherent to parental bereavement, it is a recipe for disaster.

¹ College Board. (2019). *What is the FAFSA?* <https://blog.collegeboard.org/what-is-the-fafsa>

² Page, L. C., & Scott-Clayton, J. (2016). Improving college access in the United States: Barriers and policy responses. *Economics of Education Review*, 51, 4-22. <https://doi.org/10.1016/j.econedurev.2016.02.009>.

As access to higher education continues to expand, it is critical to consider the ways parental bereavement impacts students. Bereavement—or the loss of a loved one by death—is one of the most traumatic stressors a person endures, and evidence from American institutions of higher learning show as many as 30-40 percent of undergraduate students are within the first year of grieving the loss of a close friend or family member, with nearly half being within merely two years of experiencing a significant loss.³ Scholars in this area have referred to college student bereavement as a “silent epidemic” that negatively impacts students socially, academically, and developmentally.⁴

According to data as recent as December 2022, it is estimated that 2.2 million children in the United States are parentally bereaved.⁵ We define parentally bereaved children as children and adolescents under the age of 18 who have experienced the death of a parent with whom they cohabitated, including biological, step, and adopted children. Note that we do not differentiate between children who have lost one versus both parents. Also note that for a child under the age of 18, it is rare for both parents to die. This definition conforms with those of other domestic and international policy institutes and organizations (e.g., UNICEF), in addition to U.S. government agencies (e.g., CDC).

Extensive evidence indicates bereavement is a critical risk factor for a host of serious conditions. For example, students who have lost a parent face significant adversity, including hardships that impact their physical and mental health, social stability, and financial security. Furthermore, when compared to their peers who had not lost a parent, children who had been parentally bereaved showed a higher risk of being depressed, involved in violent crimes, experiencing academic failure, attempting suicide, suicide, misusing alcohol and substances, and dying prematurely from any cause.⁶

This topic is even more relevant, given the COVID-19 pandemic. The CDC estimates one child lost a parent or caregiver for every four COVID-19-associated deaths, translating to nearly 250,000 children having lost a parent or custodial grandparent in the U.S. alone.^{7,8} These heart-wrenching figures suggest there is a greater need now than in years prior for the ED to consider the impact bereavement and orphanhood has on students.

³ Balk, D. E. (2008). Grieving: 22 to 30 percent of all college students. *New Directions for Student Services*, 121, 5-14. <https://doi.org/10.1002/ss.262>

⁴ Fajgenbaum, D. (2007). *College student bereavement: University responses, programs and policies, and recommendations for improvement* [Unpublished honors thesis]. Georgetown University. https://repository.library.georgetown.edu/bitstream/handle/10822/550863/etd_david_fajgenbaum.pdf?sequence=1

⁵ Evermore. (2022). America’s forgotten orphans: An urgent call for the White House and Congress to address childhood bereavement. <https://evermore.org/americas-forgotten-orphans-report/>

⁶ Ibid.

⁷ Centers for Disease Control and Prevention (CDC). (2021). *The hidden U.S. COVID-19 pandemic: Orphaned children – more than 140,000 U.S. children lost a primary or secondary caregiver due to the COVID-19 pandemic*. <https://www.cdc.gov/media/releases/2021/p1007-covid-19-orphaned-children.html>

⁸ Imperial College of London. (2021). *COVID-19 orphanhood: United States of America*. https://imperialcollegelondon.github.io/orphanhood_calculator/#/country/United%20States%20of%20America

Moreover, we recognize a major goal of FAFSA is to expand access to education, which inherently means providing need-based aid to those from disadvantaged backgrounds. Many of the students who receive such aid included historically marginalized populations, including those previously defined as racial or ethnic minorities. For example, 70.6 percent of Black full-time students at 4-year institutions received need-based federal aid, according to a 2011 report from the National Center for Education Statistics.⁹ Similarly, trends in parental bereavement disproportionately impact historically marginalized student populations.

Consider these quick facts on parental bereavement among students in the U.S.¹⁰:

- Since 2000, **Indigenous children** have been parentally bereaved at a higher rate than every other racial or ethnic group, reaching an all-time high of 2.2 times the national rate in 2021.
- **Black children** have experienced a nearly 20 percent increase in annual rates of childhood bereavement since 2000 and an increase of 51 percent since 2013. Their 2021 rate—579 newly bereaved children per 100,000—is second only to that of Indigenous children.
- From 2000 to 2021, the annual rate of childhood bereavement among **Asian children** increased by more than 22 percent.
- From 2019 to 2020, **Hispanic children** experienced a 40 percent increase in the annual rate of childhood bereavement, the greatest single-year percentage increase in the past 20 years.
- Between 2000 and 2020, the annual rate of parentally bereaved **White children** has steadily increased, from 341 to 499 per 100,000—a 50 percent rise.

Given the aforementioned, we strongly encourage the Secretary and Department staff to consider the following when revising the FAFSA:

- 1) Adding an orphanhood-specific question to the FAFSA.
- 2) Revising the definition of orphanhood to be congruent with those used by domestic and international policy institutes, organizations, and government agencies.
- 3) Working with states and school districts to develop bereavement policies that support students who are grieving and mourning their losses.

Specifically, we suggest the following.

- 1) Adding an orphanhood-specific question to the FAFSA.** To best support parentally bereaved and orphaned children, the ED must first collect specific data on this phenomenon to understand the unique needs and adversities these students face. At present, there is no national collection system that aggregates annual data on bereavement, such as demographics

⁹ <https://nces.ed.gov/pubs2012/2012160.pdf>

¹⁰ Evermore. (2022).

(e.g., trends by race and geography), cause of death, and family kinship. Thus, bereavement as a public health and social concern remains invisible, despite yielding the potential for significant medical, behavioral, and economic hardship among college and university students.¹¹

One notable difference between primary and secondary institutions and higher education is the way they identify at-risk children. In primary and secondary settings, schools may offer parents and guardians the ability to report a child's bereavement status during the annual student registration process, much as they can report health concerns (e.g., allergies), guardians' occupational status (e.g., parents who are in the military), and academic challenges (e.g., dyslexia). However, in the post-secondary educational landscape, institutions must rely on students self-reporting the death of a parent or primary caregiver—and as prior research has shown—many are averse to self-disclosing such incidence.

Worse yet, the vast majority of colleges and universities lack student-specific bereavement policies.¹² This means the self-disclosure of parental loss remains solely in the hands of the bereaved student, forcing them to contact individual professors, department chairs, deans, and other administrators to request excused absences, deadline extensions, and other accommodations. For many, and particularly among traditionally marginalized populations, the power differential alone is enough to warrant avoiding disclosure.

This overall lack of structure leads to critical data slipping through the cracks. Depending on who died in the household, additional insecurities may ensue, resulting in food, housing, financial, and healthcare insecurity. These insecurities, along with the demands of academic rigor and competition, can accumulate to impair a student's ability to enroll and succeed academically.

Despite these alarming scenarios, there is currently no mechanism through which institutions of higher education can identify grieving students and refer them to campus-based resources.¹³ We feel strongly that revising the FAFSA to enable the collection of critical data on the parentally bereaved will help the ED grasp the adversities orphaned children face when entering higher education, allowing these issues to be more readily addressed and supporting the preparation these students require for short- and long-term success.

- 2) Revising the definition of orphanhood to be congruent with those used by domestic and international policy institutes, organizations, and government agencies.** Currently, ED's proposed revision to FAFSA defines orphanhood as "at any time since the student turned 13, they were an orphan (no living biological or adoptive parent)."

¹¹ Evermore. (2022).

¹² Servaty-Seib, H., & Liew, C. H. (2019). Advocating for bereavement leave policies for college students. *Journal of College Student Development, 60*(2), 240-244. doi: 10.1353/csd.2019.0021

¹³ Evermore. (2022).

Defining orphan status when a student turns 13 is not congruent with other United States governmental agencies, as well as policy institutes, both domestic and abroad. The department should define orphanhood as the phenomenon of a child under 18 losing *one or both parents or primary caregivers*.^{14,15}

- 3) Working with states and school districts to develop bereavement policies that support students who are grieving and mourning their losses.** According to ED, more than 73 million students attended schools in 2020. This figure includes students at every level, from those in kindergarten to those in postsecondary institutions (e.g., colleges and universities).^{16,17} As concurrent mortality epidemics sweep the nation, students are not immune from the toll that death has taken on families. By some estimates, 40 percent of university students have experienced the death of a loved one in the previous two years;¹⁸ however, while the number of bereavement leave policies aimed at supporting students in higher educational settings has increased in recent years, they are the exception, not the rule, (e.g., Purdue University’s GAPS policy).¹⁹

In closing, we believe the Department of Education must act on behalf of grieving students and families, and we thank you for the opportunity to submit these comments.



Joyal Mulheron
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¹⁴ <https://www.cdc.gov/globalhealth/covid-19/orphanhood/index.html>

¹⁵ <https://www.thestarsfoundation.net/unicef-orphans.html>

¹⁶ National Center for Education Statistics (NCES). (n.d.). *Back-to-school statistics*. <https://nces.ed.gov/fastfacts/display.asp?id=372#PK12-enrollment>

¹⁷ Cox, B. E., Dean, J. G., & Kowalski, R. (2015). Hidden trauma, quiet drama: The prominence and consequence of complicated grief among college students. *Journal of College Student Development*, 63(5), 280-285. https://www.researchgate.net/publication/277921722_Hidden_Trauma_Quiet_Drama_The_Prominence_and_Consequence_of_Complicated_Grief_Among_College_Students

¹⁸ Cousins, C., Servaty-Seib, H., & Lockman, J. (2016). College Student Adjustment and Coping: Bereaved and Nonbereaved Students. *Omega—Journal of Death and Dying*, 74(4), 386–409. <https://journals.sagepub.com/doi/10.1177/0030222815598911>

¹⁹ Liew, C. H., & Servaty-Seib, H. (2020). College Students’ Feedback on a Student Bereavement Leave Policy. *Journal of Student Affairs Research and Practice*, 57(1), 55–68.

<https://www.tandfonline.com/doi/abs/10.1080/19496591.2019.1614940?journalCode=uarp20>