August 1, 2026

The Honorable Sabrina Cervantes
Chair, California State Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: Assembly Bill 2251 (Rodriguez): SUPPORT AS AMENDED MAY 18, 2026

Dear Chair Cervantes:

As a trusted source of research, design, and advocacy for student-centered public policies that promote affordability, accountability, and equity in higher education, The Institute for College Access & Success (TICAS) writes in strong support of AB 2251 (Rodriguez), as amended May 18, 2026, which we are co-sponsoring. This bill is critical to college affordability because it would expand students' access to financial aid by increasing transparency in institutional cost of attendance (COA) budget calculations and standardizing the COA adjustment process across California's higher education institutions.

Cost of attendance (COA) is a central factor in determining the maximum amount of financial aid a student can receive. COA represents an institution's estimate of the total cost of attending college, including tuition and fees, housing, food, transportation, books and supplies, and other related expenses. Federal policy allows financial aid administrators to adjust elements of a student's COA on a documented, case-by-case basis when actual expenses exceed institutional estimates. When implemented effectively, this process ensures students can access the full financial aid for which they qualify and remain enrolled.

However, COA adjustment practices vary widely across campuses, creating inequitable access for students with financial need. A recent report by the California State Auditor found that many institutions do not make information about how COA figures are calculated publicly available, and a separate statewide analysis found that nearly half (43%) of institutions do not publish COA appeal information online. As a result, students are often unaware that adjustment options even exist. This lack of transparency disproportionately impacts students who face higher costs or limited financial support, such as low-income students, students with experience in foster care or homelessness, and student parents. A survey of foster youth support program staff found that over half (55%) of campuses reported that students have been unable to receive financial support from their program due to COA limits, and 46% reported that students turn down financial aid, including but not limited to foster youth support program funds, because they cannot access adjustments. Challenges such as these undermine a student's ability to meet basic needs and persist in college.

AB 2251 establishes clear and consistent standards so students across California can fully access the financial aid they are eligible to receive. Specifically, the bill would require institutions, as a condition of Cal Grant participation, to:

- Prominently display, using student-friendly language, information about the institution’s COA adjustment process.
- Allow students to request adjustments to any COA budget expense category, without limits on the number of requests.
- Publish the basis for the amounts included in each category within their COA budgets, including the data sources used and assumptions made.
- Not impose COA adjustment request deadlines earlier than three weeks before the end of each term.
- Notify students of the decision on their COA adjustment request within 30 business days; in the event of a declared state of war emergency, state of emergency, or local emergency, an institution may have an additional 30 days.
- Accept COA adjustment requests in either electronic or hard copy form.
- At the discretion of the institution, provide a second-level review process for students whose adjustment requests are denied, if requested by the student.
- Include a statement that COA appeals may result in various forms of financial aid, including grant aid or loans, when describing the potential outcomes of a COA appeal or adjustment, in publicly available materials or communications.

By improving transparency and standardizing processes statewide, AB 2251 will reduce preventable financial aid gaps and help ensure students have the resources they need to remain enrolled and succeed. We respectfully urge the Senate Appropriations Committee to vote in support of AB 2251 and move the bill off suspense and on to the Senate Floor for a full chamber vote.

Sincerely,

Manny Rodriguez
Senior Director of Policy & Advocacy, California
The Institute for College Access & Success (TICAS)

CC: Assemblymember Celeste Rodriguez, California State Assembly
Lenin Del Castillo, Consultant, California State Senate Appropriations Committee
Members, California State Senate Appropriations Committee
Senator Monique Limón, President pro Tempore, California State Senate