NASFAA
NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

IMPLICIT BIAS TOOLKIT

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Implicit Bias Task Force Toolkit

As individuals, we all have implicit or unconscious biases which are the assumptions, stereotypes, and unintentional beliefs about others based on their perceivable characteristics. These biases develop throughout our lives and are based on our own lived experiences as well as the messages we receive from family, friends, the media, popular culture, and social media. Biases can be positive or negative and influence us to have a preference or aversion toward a person or group of people based on our attitudes about them without our awareness.

To function in a complex world, we do most of our thinking in our subconscious. This is where our implicit associations are created and stored. This means that we are likely to act on our biases without even realizing it. However, there are steps institutions and individuals can take to address the negative impact of implicit bias. These steps include self-awareness about our own biases, identifying areas where implicit biases may affect decision making, behaviors, and judgments, and addressing those areas with procedures and processes that reduce the operational influence of implicit bias.

It is vital to recognize that implicit bias is part of the human condition and is not limited by race, gender, or any other identities. When we accept this reality, it allows us to move forward with steps to address implicit bias. As financial aid administrators, we directly influence the trajectory of our students' lives through our work and can create a more socially just society. If we don't acknowledge and dismantle the impact of implicit bias in our profession, we risk endangering the academic futures of the students who rely on our professional neutrality.

Awareness & Individual Development Policy

Best Practices for Implicit Bias Awareness & Individual Development

1. **Acknowledge implicit bias exists.** It is impossible to escape the influences and consequences of our country's history. Despite our best intentions and efforts, none of us are immune to implicit bias. It is a universal human experience so accepting this reality is a key first step in addressing implicit bias.
2. **Get curious about your own biases.** Take the Harvard Project Implicit Bias Test; it provides an opportunity for self-understanding of our own individual biases.
3. **Create new and deeper connections.** Start a conversation to create deeper connections and get to know people who come from different backgrounds or have different perspectives than you.
4. **Reconsider stereotypes.** We must challenge and question the assumptions we make about others with the goal of fair treatment for everyone, regardless of their identities.
5. **Consider whose voices are and are not represented.** In meetings, committees, and other places where decisions are made, ensure diverse perspectives are included and authentically welcome.
6. **Foster learning and training.** Encourage, create, and utilize campus, community, and online resources to engage in diversity, equity, inclusion, and social justice learning and training focused on implicit bias. Seek out learning through articles, videos, podcasts, etc., and participate in training opportunities that encourage learning about implicit bias.
7. **Develop action steps.** Use the guiding questions and information in the "Why Do Diversity & Inclusion Matter" section of the NASFAA Diversity Toolkit to develop awareness and action steps.

Institutional Forms Policy

When evaluating your institution's processes, it is important to do so from top to bottom, including an evaluation of your office's forms. As aid professionals we must remember that many of the policies and concepts that are part of our day-to-day procedures are new to our students and their families.

Some federal requirements may appear to students as biased, such as verification to low-income students or Selective Service System registration to male students. It is the role of the aid office to help explain these requirements to the best of our ability and assist students in resolving these eligibility requirements.

Using Inclusive Language

All external communications should be written in a way that everyone can understand. Inclusive language should acknowledge diversity and be sensitive to the differences between us. Inclusive language will help your messaging resonate with a larger audience and ensure your students feel a part of the community.

Make sure that the language you're using is inclusive and doesn't turn certain candidates off or make them feel as though they're not what you're looking for.

- Only request data that is necessary to meet a form's intended purpose. Evaluate each data element to ensure it is essential to completing/resolving the task or issue to which it is related.
- Be precise and use clear and plain language. Neurodiverse students often struggle to answer questions or follow instructions that can be interpreted in a variety of ways or depend upon social assumptions. When using acronyms be sure to explain what they represent.
- Use chosen or preferred name whenever possible.
- Be sure to use gender-neutral pronouns. When providing examples, use "they" or "their" in an effort to not alienate individuals. This will also help ensure you are not making assumptions about the student's or parent(s)'s gender identities.
- Offer assistance on your forms and include your office's contact information. Create an environment that is not only accommodating to students but is openly welcoming to questions.
- If your office has the ability, ask a student for their preferred pronouns, and make a notation in your system for future reference.
- If your forms are primarily web-based/online, be sure you make it known that an alternative paper version is readily available as well.
- Be careful not to make assumptions about familial relationships. For example, use "parent(s)" instead of "parents" and be mindful that extended family may be part of the household.
- Use "parent 1" and "parent 2" instead of "mother" and "father."
- Use person-first language. When using descriptive language, put the person before the condition or situation. For example, use "person who is disabled" and "a person experiencing homelessness."

Ensuring an Inclusive and Accessible Website

More and more, financial aid office websites have become a "go-to" for information on an institution's financial aid policies and procedures. It is therefore vital that the guidance above for financial aid office forms should also apply to language you develop for your aid office's website.

It is important to ensure that students with disabilities have the same access as nondisabled students. For example, when developing content on your website, you should be mindful of students using screen readers and other devices. Many institutions have web accessibility initiatives on their campuses to ensure accessibility. Check what resources your institution has available to assist in your efforts.

Staff Engagement

Engage your staff in reviewing your policies, processes, and forms. This will help to ensure a larger representation of different perspectives has been involved, but this will also help to convey to your staff that creating an inclusive environment is a priority at your school. Be open to feedback from both staff and students.

Aid offices are encouraged to create email and counseling standards for staff to use when communicating with students and parents, incorporating the form guidance outlined above. It is important to incorporate language in all our student interactions.

Communication Policy

As there are many ways to communicate with students, the challenge becomes how to effectively manage communications and manage expectations when communicating with students. The purpose of this policy is to provide clarity to the student experience and promote student engagement.

Some benefits of ongoing and effective communication are:

• Building trust.

• Preventing or resolving problems.

• Creating better relationships.

• Providing clarity and direction.

• Increasing engagement.

• Improving productivity.

• Promoting team building.

Any communications sent to the student body should align with the college or university's values and mission statement. Communications should be student-focused, consistent, and relevant to the topics which will enhance the student experience. Communications to students should be through institution approved avenues (email, phone, text, social media, etc.). It's recommended that a student-focused team be charged with all communication to ensure consistency and a communication calendar be developed. Communications should provide clarity and be consistent with any change that impacts the student body.

Professionalism in Communication

In all communications, staff are reminded of their responsibility to serve the interests of the institution and always ensure appropriate content. Staff should ensure appropriate response times are adhered to when communicating with students. A fair judgement should be made regarding the nature of the issue at hand, however all communication requiring a response should be actioned within five working days. During absence or when staff will not be able to respond in a reasonable time, staff should provide an autoreply to their emails with details of an alternative contact.

Complaints

Students of the institution should be provided with clear instructions of how and where to submit complaints/ grievances and provided a timeline for a response or resolution.

Cost of Attendance Policy

A postsecondary institution establishes its cost of attendance (COA) budget based on average costs for the categories of tuition/fees, books/supplies, transportation, room/board, and personal/misc. In addition, standard costs for dependent care, disability-related expenses, and loan fees are added for affected student populations. The costs for each category are determined annually through a data-driven review of consumer and student surveys that are evaluated to ensure effective standards to support a moderate standard of living. Efforts are taken to reduce systemic bias in determining the student categories and associated costs to accurately reflect the experiences of the students within each student category.

NASFAA COA Best Practices (from Monograph #24, "Developing the Cost of Attendance"):

- Use separate budgets for categories of students with different circumstances.
- Use relevant data sources to determine actual costs:
    - o Averages from College Board, Consumer Expenditure Survey, or the Consumer Price Index.
    - o Survey students to obtain cost and budget data.

Best Practices to Reduce Implicit Bias in the Standard COA Budget (building on the Study Guide):

1. **Check Surveys for Nonresponse Bias –** When surveying students, check the demographic data of the survey respondents against student demographic averages to ensure that you captured responses from a representative sample. If the survey does not include a representative sample, who has not contributed to the calculation of average costs? How might the cost data for those students be gathered more effectively?
2. **Test the Budget Efficacy Using Personas –** After setting a budget, create a variety of student personas to ensure that the budget would provide a moderate standard of living for most students across all demographics. Consider what costs are a special circumstance that should only be increased through professional judgment and what costs are normal for a particular student population, even if that student population is a minority population.
3. **Analyze COA Appeals to Inform the Standard Budget –** Routinely analyze the COA appeals that have been submitted to determine whether there is systemic bias in the standard COA budget. What are the most requested appeal categories? Who does the standard budget not serve?
4. **Use COA Budget and Appeal Data to Advocate –** Financial aid administrators have data that could be used to advocate for student support in the wider institutional system. Disaggregated data showing that a particular student population is struggling to access affordable housing, food, or transportation could result in changes elsewhere in the system that could better support student success and financial wellness.

Scholarship Policy

"Challenging ourselves to see the things we do that exclude or marginalize or devalue others."

Can we speak about implicit bias without recognizing and being aware of our unconscious bias? Implicit bias manifests in expectations or assumptions about physical or social characteristics dictated by stereotypes that are based on a person's race, gender, age, or ethnicity. People who intend to be fair, and believe they are egalitarian, apply biases unintentionally. Take subjectivity out of processes.

Areas of Review:

- Donor Relations/Management
- Alumni (in selection process)
- Stewardship scholarship questions asked

Scholarship Programs Best Practices

- Financial aid offices should work collaboratively with the advancement office when onboarding new scholarships. This will help with the donor agreement and/or relationship.
- Scholarship applications should be considered to accommodate all demographics.
- Depending on the scholarship agreements, scholarship selections could vary across many departments. It's effective to have a liaison in the financial aid office to communicate across many departments.

NASFAA's Recommended Practices for Reviewing/Addressing Implicit Bias in Scholarship Programs

Implicit bias refers to the stereotypes, biases, and attitudes we unconsciously hold that influence our actions, understanding and decisions. They can be helpful in that they allow us to quickly make decisions, and in other situations, they can be unhelpful in that they allow us to unconsciously exclude, marginalize, or devalue others. We must therefore become aware of our unintentional applied biases and work towards more inclusivity. This section of NASFAA's recommended practices for scholarship fund administration will discuss where implicit bias may be inherent in the scholarship process and how we can proactively address it to improve the experience of the ultimate beneficiary of scholarships — the students. We recommend that schools review, evaluate, and streamline their entire process of administering scholarship funds.

Secure Funding

From the onset of raising funds, schools will want to maintain a donor-friendly culture while being strategic in knowing well, and communicating to donors, the needs of their student population. To this point, financial aid and advancement offices should work together when onboarding new scholarships. Schools should strategize about how best to help students in need while also casting a wide enough net to include and attract a diverse group of student applicants, accommodating all student demographics.

Donor agreements can then be written to be clear and concise, including donor criteria and with sufficient flexibility to allow for proper administration. For instance, if a donor wishes a scholarship to be awarded to full-time students (e.g., 12-19 credits), it is important that another credit requirement does not then contradict this intent. In other words, the donor agreements should not then specify another number of credits (e.g., 15 credits) which can then create a contradiction in awarding strategy. Donor agreements should also include flexible disbursement timelines in support of students. Donor agreements should also reflect new guidance regarding civil rights in scholarship criteria and a review of existing criteria for protected classes.

Application Process

While scholarships may be administered directly or via scholarship management system, it is important that there is a system/mechanism in place to set a deadline, promote the application, manage submissions, award scholarships, and produce reports useful to colleges, donors, and students.

Scholarship applications should be designed so that schools collect only pertinent information that help with better awarding decisions. Information that can be gathered/verified (e.g., GPA, degree, class) from a school's student information system can be pulled separately, thus providing ease of application completion.

Schools should be intentional in their communication, awareness, and targeted efforts to attract applicants (including at-risk students).

Selection Process

Well-defined purposes of scholarships and selection criteria will ensure that applicants are judged on the same scale and students are not left without understanding how all is evaluated. When selecting scholars, it is best to remove personally identifiable information such as name, date of birth, post code.

Schools may also wish to implement a scholarship rubric to give scholarship committee members and students clarity in selection process.

Scholarship committee members, including alumni, should be provided with implicit bias awareness training.

Also, depending on the scholarship agreements, scholarship selections could vary across many departments. It's effective to have a liaison in the financial aid office to communicate across many departments.

Reporting

Scholarship committees should articulate why specific students were selected as well as how their selection in a particular year furthers the purpose of the scholarship therefore demonstrating a school's commitment to student success. This is also an opportunity to connect scholars with their donors.

Applicant and recipient data can be used to track trends over time, better understand the applicant pool, and see how exactly scholarships funds were used and how students who received awards fared overall. Data review will allow student representation in scholarship awarding to be evident and/or reveal bias trends that should be reviewed and updated.

Be transparent about the scholarship office and all review committee policies.

Student Worker Program Policy

The Federal Work-Study (FWS) program provides jobs for undergraduate and graduate students who demonstrate financial need. FWS gives the student a chance to earn money to help pay for educational or personal expenses while working on campus or in community service work.

Provisions of the FWS program may be seen as subjective as many times students may be offered an allocation and not use the funds, or offered and not aware of the program, or perhaps offered funds based on the FAFSA question not knowing what it meant. To eliminate any confusion and to provide equity the following is recommended:

- Automatic awarding should be the standard to all eligible students.
- Develop a policy which allows you to award those who are admitted late or late completing the FAFSA (consider resource and knowledge inequities).
- Avoid using the question on the FAFSA as the sole basis for making awarding decisions.
- Consistent student outreach to inform eligible populations of availability of FWS funds and deadlines.
- Coordinate with appropriate offices to ensure job placement and interview processes have equity requirements based on student experience for equal opportunity.
- Develop priority deadlines that encourage productivity but are not punitive, so that exceptions can be made.
- Provide flexibility to first-time freshman to consider the unknown.
- Ensure job postings use inclusive language so as not to alienate populations.
- Consider using FWS funds to create positions such as tutors, ambassadors, academic services to assist with outreach efforts proactively.

School Selected Verification Policy

In compliance with CFR 668, Subpart E, the institution will verify all federal student aid applicants whose applications have been selected for verification by the U. S. Department of Education (USDOE). At the institution, an applicant is defined as a recipient of, or an applicant for Federal Title IV aid who enrolled during the award year. If a student's application is selected for verification, the student must complete the verification process or forfeit federal student aid, and the student will be responsible for any charges incurred.

The school may also select those applications for verification if there is conflicting information. Verification is done by collecting the documents the student used to complete the FAFSA and comparing them with the information the student provided on the FAFSA. A student may not receive financial aid until the verification process is complete. Verification of required documents is generally completed within two weeks after submission of all documents. During peak periods (July, August, and September) more time should be allowed.

A school should determine by data analysis which files are routinely school-selected and determine what the error rate is. If it's determined based on the data that the school should continue to self-select the area identified, the following is recommended:

- Establish a set of requirements to review.
- Aim to not be too restrictive.
- Routinely run the data to determine the need to continue verifying unselected students.
- Publish the data findings for transparency's sake.

Additionally, a school should note and/or remove from policies items that are verified unnecessarily:

- Other untaxed income (e.g., from W-2s).
- Payments to tax-deferred retirement plans.
- Child support received/paid, etc.
- Military and clergy housing allowances.
- Exceptionally low or zero income.
- Dependency status questions (Being under 24 and an independent student is not a red flag).
- Level of support provided to household members (for inclusion in household size).

Professional Judgment

While implicit bias cannot be completely removed from those who make decisions, implicit bias can be effectively identified and purged from institutional policies and procedures with sufficient understanding, diversity, cooperation, transparency, and accountability. Given this, financial aid offices should:

1. Ensure that policymakers and appeal adjudicators have completed thorough training in the areas of implicit biases. These individuals should understand what implicit biases are, how to identify them, and how to cooperatively mitigate their effect on students and families.
2. Where possible, aim for the policy and appeal decisions to be made by highly diverse committees composed of multiple professionals both within and outside of the financial aid office. These committees should consider including diversity officers, faculty, and staff to create a well-rounded cooperative that is poised to identify and mitigate implicit biases.
3. Ensure your institution's required documentation and how your office adjusts for specific situations are well-documented in your policies and procedures to ensure consistency across all student populations.
4. Identify and maintain demographic data related to their appeal populations and be ready to present this data for regular review by diversity personnel. These reviews should seek to identify areas where policies or procedures may be improved and/or examine ways to create greater equity among negatively affected populations.
5. Consider removing unnecessary personal identifiers or bias-prone contexts from files before being reviewed by committees.
6. Ensure all appeal procedures and forms are ADA accessible.
7. Identify and target marginalized populations to ensure they are aware of the beneficial appeal options available to them.
8. Recommend training for the professional judgment process and incorporate quarterly audits to ensure consistent decisions within similar scenarios.

Resources

1. Disability Language Style Guide
2. General Guidelines for Reducing Bias
3. https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/bias_9-14-15_final.pdf
4. Inclusive Alumni Scholarship Process (reading applications)
5. Addressing Implicit Bias in Recommendation/References
6. Strategies for Countering Unconscious Bias in the Classroom
7. The Paradox of Implicit Bias and a Plea for a New Narrative
8. https://www.scholarshipproviders.org/
9. Perception Institute: Implicit Bias Explained
10. Love has no labels: https://lovehasnolabels.com/why-it-matters
11. Association of American Colleges & Universities: Grabbing Third Rails: Courageous Responses to Persistant Equity Gaps
12. Using Professional Judgment in Financial Aid to Advance Racial Justice and Equity

NASFAA extends its thanks the members of the Examining Implicit Bias in Financial Aid Policy and Procedures Task Force for their work on this toolkit. As disseminated by this group, this reference should not be considered a final product, but rather an ever-evolving document that can be adapted and expanded as cultural and societal circumstances necessitate. Identifying and evaluating our own biases and systems requires vigilance and ongoing work. Suggestions for edits and additions are welcome and can be sent to ethics@nasfaa.org.

The National Association of Student Financial Aid Administrators (NASFAA) provides professional development for financial aid administrators; advocates for public policies that increase student access and success; serves as a forum on student financial aid issues; and is committed to diversity throughout all activities.

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1801 PENNSYLVANIA AVENUE, NW, SUITE 850
WASHINGTON, DC 20006-3606
202.785.0453 | fax 202.785.1487 | WWW.NASFAA.ORG