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Policy on Paper, Barriers in Practice: Rethinking California's AB 469

A Case Study of AB 469 Implementation in Southeast Fresno High Schools

Valeria Pasillas

INTRODUCTION

In 2021, California passed Assembly Bill 469 (AB 469), requiring all public high school seniors to either complete the Free Application for Federal Student Aid (FAFSA) or the California Dream Act Application (CADAA), or formally opt out¹. The law was designed to expand financial aid access and close longstanding college enrollment gaps, especially for first-generation, low-income, and undocumented students. While statewide FAFSA completion rates have steadily improved since the law's implementation, CADAA completion rates remain disproportionately low, particularly among students from immigrant and mixed-status families. This memo uses Fresno Unified School District² (FUSD) - five Southeast Fresno high schools in particular - as a case study to examine the law's uneven implementation. The high schools analyzed

(Edison³, Hoover⁴, McLane⁵, Roosevelt⁶, and Sunnyside⁷) serve large populations of Latinx, first-generation, and undocumented students. Despite some localized improvements, CADAA completion at these schools continues to fall short due to persistent structural and political barriers.

Key findings from this analysis highlight the disconnect between AB 469's equity goals and the on-the-ground reality for undocumented students. Serving as a microcosm of what is occurring statewide, these FUSD high schools face high counselor-to-student ratios, lack

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<https://www.ed-data.org/school/Fresno/Fresno-Unified/Edison-High>

⁴<https://www.ed-data.org/school/Fresno/Fresno-Unified/Herbert-Hoover-High>

⁵<https://www.ed-data.org/school/Fresno/Fresno-Unified/McLane-High>

⁶<https://www.ed-data.org/school/Fresno/Fresno-Unified/Roosevelt-High>

⁷<https://www.ed-data.org/school/Fresno/Fresno-Unified/Sunnyside-High>

¹ [Bill Text: CA AB469 | 2021-2022 | Regular Session | Chaptered | LegiScan](#)

² <https://www.ed-data.org/district/Fresno/Fresno-Unified>

CADAA-specific training, and offer uneven outreach across school sites. These gaps are further compounded by student fears of data misuse and deportation, fears intensified under the current federal administration. Without targeted implementation strategies, AB 469 risks reinforcing the very inequities it was meant to dismantle.

This memo recommends three interventions:

- (1) state-funded CADAA-specific counselor training in high-need districts;
- (2) formalized partnerships between school districts and trusted community-based and legal aid organizations;
- (3) push for a statewide or local AB 469 oversight committee.

PROBLEM OVERVIEW & EVIDENCE

While AB 469 was designed to expand access to financial aid for all students, its rollout has revealed deep inequities in how students are supported through the application process, especially those completing the CADAA. For undocumented and mixed-status students, the stakes of applying for aid are uniquely high. The process is often clouded by fear, misinformation, and inconsistent support from schools. Even when students are eligible for aid, systemic barriers often prevent them from completing the application.

This section examines how AB 469 has played out across three key areas: ***completion rates, counselor capacity and training, and student experience***. While AB 469 was fully implemented after September 1,

2022⁸, this memo focuses on data from 2023 to 2025. Although this timeframe does not capture the earliest phase of implementation, it offers a clearer view of how the policy has evolved in practice, particularly under shifting political conditions. Due to limited and uneven public reporting, this analysis relies on the most recent and accessible data to highlight where equity efforts are falling short.

FAFSA vs. CADAA Completion Rates

To assess AB 469's impact, this analysis focuses on five Fresno Unified high schools: Edison, Hoover, McLane, Roosevelt, and Sunnyside. These schools enroll large numbers of Latinx, immigrant, and first-generation students. Combined, they serve over 11,400 high school seniors⁹. The data reveals a consistent pattern: while FAFSA completion has largely rebounded following statewide dips in 2024, CADAA submissions remain disproportionately low—especially by the Cal Grant priority deadline of March 2¹⁰



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<https://legiscan.com/CA/text/AB469/id/2436165#:~:text=This%20bill%20would%20require%2C%20on,financial%20aid%20forms%2C%20as%20specified.>

⁹ <https://www.ed-data.org/district/Fresno/Fresno-Unified>

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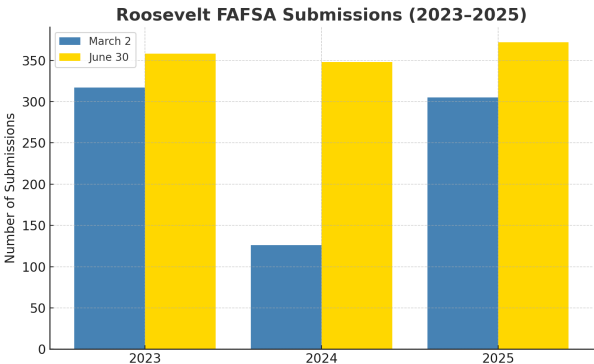
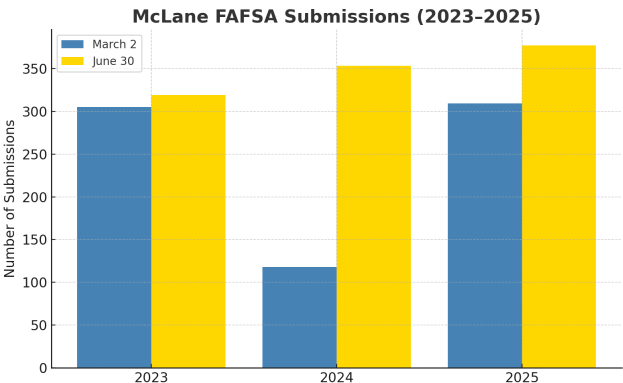
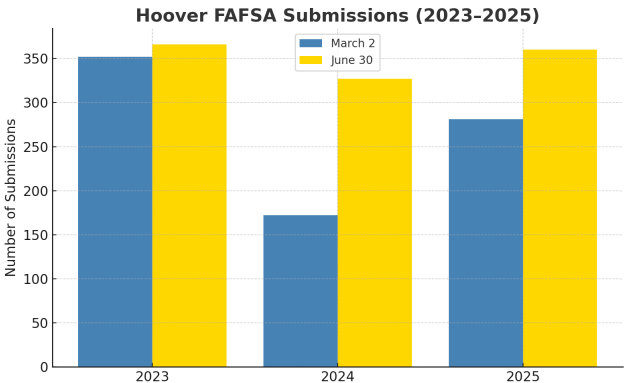
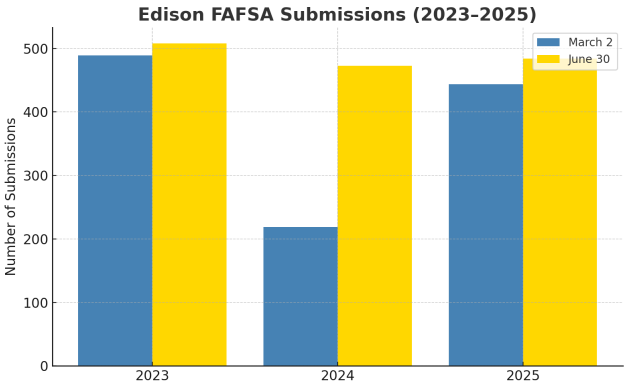
<https://www.csac.ca.gov/post/what-deadlines-should-i-mark-my-calendar>

A. FAFSA Rebound: Steady Recovery Across Schools

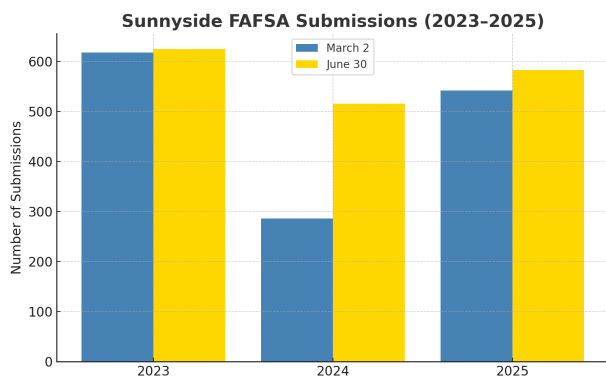
Despite the technical issues with FAFSA in 2024, most schools in this analysis showed a strong recovery by 2025.

- **Edison High School** (574 seniors in 2024), had FAFSA completions dropped to 210 in 2024 but rebounded to **441 in 2025**, meaning **77%** of seniors submitted FAFSA that year.
- **Hoover High School** (445 seniors in 2024), FAFSA completions rose from **205 in 2024 to 318 in 2025**, covering **71%** of seniors.
- **McLane High School** (444 seniors in 2024) jumped from **154 FAFSA completions in 2024 to 336 in 2025**, covering over **75%** of the senior class.
- **Roosevelt High School** (469 seniors in 2024) showed a similar rebound: **128 FAFSA completions in 2024**, increasing to **329 in 2025**, or about **70%**.
- **Sunnyside High School** (610 seniors in 2024) demonstrated strong FAFSA engagement, with completions jumping **from 275 to 537 in one year**—reaching nearly **88% of students**.

These rebounds show that FAFSA outreach has become more institutionalized, perhaps due to counselor familiarity, clearer processes, and community normalization of FAFSA behavior¹¹.



11 [https://studentaid.gov/data-center/student/application-volume/afsa-completion-high-school](https://studentaid.gov/data-center/student/application-volume/fafsa-completion-high-school)

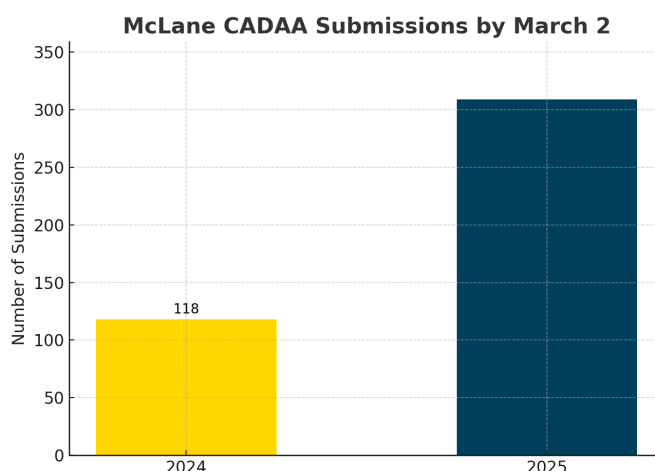
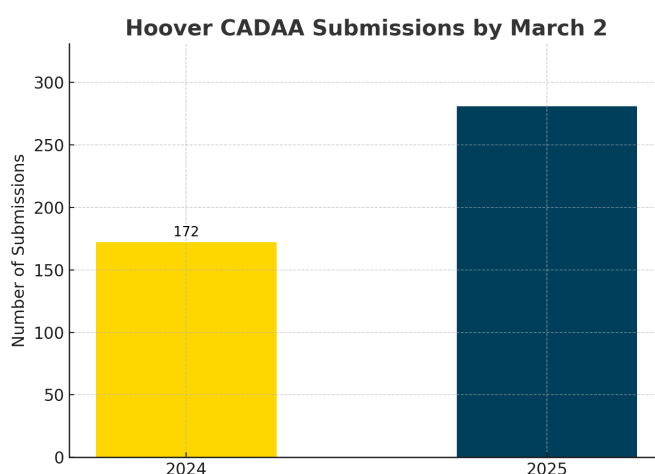
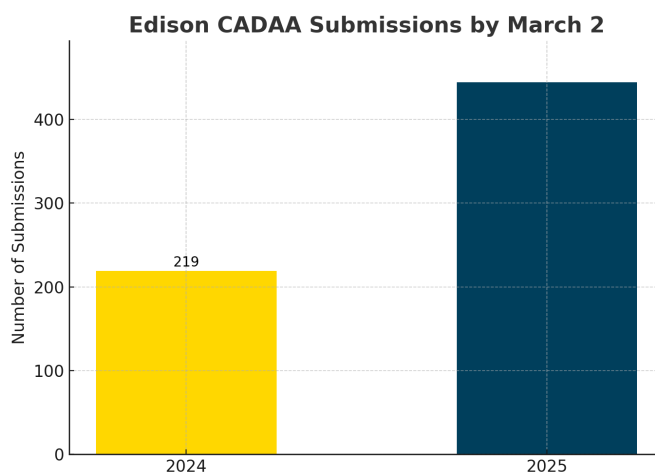


B. CADAA Remains the Outlier: Consistently Lower and Often Too Late

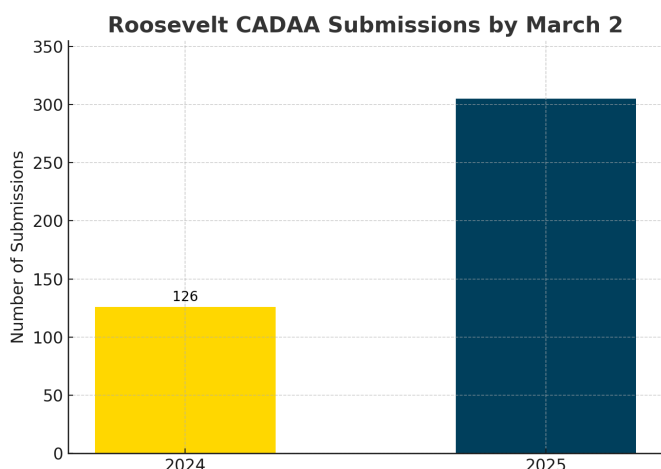
In contrast, CADAA completion remains significantly lower in every school, particularly when comparing March 2 submission rates¹².

- **Edison High** (574 seniors) saw **only 219 CADAA submissions by March 2 in 2024**, and **444 by March 2 in 2025**—nearly equal to FAFSA but with substantial outreach likely required.
- **Hoover High** (445 seniors) had **just 172 CADAA submissions by March 2 in 2024** and **281 in 2025**, trailing behind FAFSA by nearly 40 completions.
- **McLane High** (444 seniors) had **only 118 CADAA submissions in March 2024**, rising to **309 by March 2 in 2025**—a strong improvement, but still leaving over 100 seniors unserved.
- **Roosevelt High** (469 seniors) had **126 CADAA submissions in March 2024** and **305 in 2025**. Despite being in an immigrant-heavy community, CADAA lagged FAFSA by 24 students.
- **Sunnyside High** (610 seniors) showed the strongest CADAA performance, with **542 CADAA**

submissions by March 2 in 2025, outpacing FAFSA (537) and demonstrating what's possible with targeted investment.



¹² <https://www.csac.ca.gov/post/total-applications-high-school>

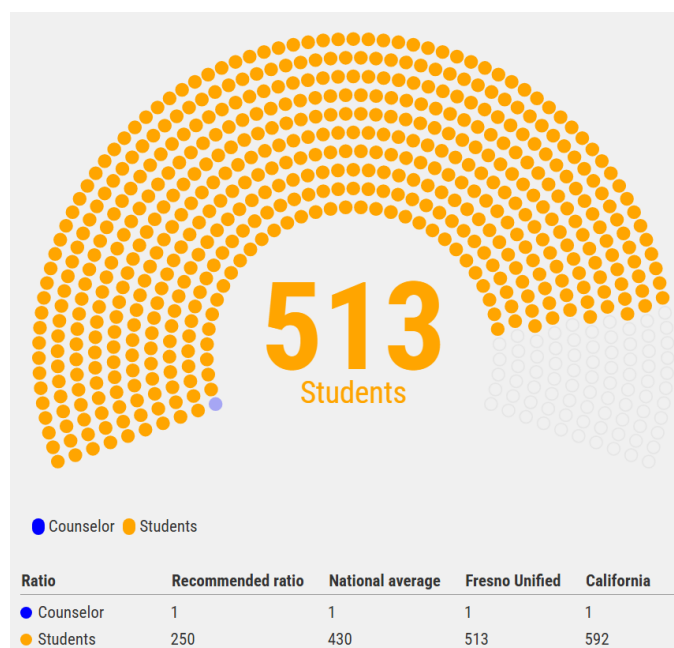


Despite progress at some schools, the timing of CADAA submissions raises serious concerns. A noticeable spike in completions between March and June suggests that many students are either unaware of the critical March 2 Cal Grant deadline or are not receiving adequate support to complete the application on time. This delay in filing can have significant consequences: students who submit after the deadline are often disqualified from receiving full state aid, such as Cal Grants. At Hoover High School, for instance, CADAA submissions increased from 172 in March 2024 to 327 by June—an 89% jump. While this growth in submissions may seem promising on the surface, it ultimately reflects a deeper issue: students are applying too late to access the aid they are entitled to. This pattern highlights a systemic gap in early outreach and counseling support, particularly for undocumented and mixed-status students who already face unique barriers to navigating the financial aid process. Without timely guidance, these students risk falling through the cracks, yes completing applications, but missing out on the resources they need to actually attend college.

Counselor Ratios and Training Gaps

To understand why so many students continue to miss out on financial aid despite completing applications, we must examine the on-the-ground capacity of schools to provide timely, informed support—starting with the availability and training of counselors. One of the clearest indicators of implementation capacity is counselor staffing, particularly in large urban districts like Fresno Unified, where over 70% of students are Latinx, low-income, and/or first-generation.

National guidelines recommend a **250-to-1 student-to-counselor ratio**¹³, yet Fresno Unified has long exceeded this threshold, averaging **more than 500 students per counselor**¹⁴ across the district.



Source: [Fresno Unified - student-counselor ratio | Flourish](#)

¹³

<https://www.nea.org/nea-today/all-news-articles/schools-need-more-counselors>

¹⁴ [Fresno Unified - student-counselor ratio | Flourish](#)

School-by-School Counselor Ratios (2023-24)

School	12th Grade Enrollment	Total Enrollment	Counselors	Counselor Ratio
Edison	574	2432	10	~243:1
Hoover	445	2021	8	~252:1
McLane	444	2045	8	~255:1
Roosevelt	469	2198	9	~244:1
Sunnyside	610	2749	15	~183:1

This table reveals several important trends:

Sunnyside, with the **lowest counselor-to-student ratio (~183:1)**, also had **the highest FAFSA and CADAA completion rates** in 2025. It is the only school where **CADAA completions slightly surpassed FAFSA**, a strong indicator of both outreach effectiveness and institutional capacity.

Edison, which approaches the recommended staffing standard (~243:1), also saw near parity between FAFSA (441) and CADAA (444) in 2025. This school's strong performance suggests that hitting or approaching the national ratio standard matters.

In contrast, **Hoover, McLane, and Roosevelt**, with slightly higher counselor loads (~**252–255:1**), experienced noticeably lower CADAA completions relative to FAFSA. At Hoover, for example, 37 fewer CADAA applications were submitted compared to FAFSA, despite nearly identical 12th grade enrollment to Edison.

Though all five schools are within 10–20 students of the national 250:1 benchmark, small deviations correlate with measurable drops in CADAA submission,

highlighting how even marginal staffing gaps can affect undocumented students who may require more time-intensive advising.

B. Counselor Capacity and Completion Outcomes Are Closely Linked

Completion data from 2023 to 2025 shows that **as** counselor ratios improve, FAFSA and CADAA rates converge. At Sunnyside and Edison, where counselor capacity is strongest, the gap between applications is almost negligible. In contrast, schools with heavier caseloads show persistent disparities, particularly on CADAA, despite large 12th grade classes and demonstrated need.

These differences aren't just about numbers. They point to capacity limits within schools that directly impact whether undocumented and mixed-status students complete financial aid applications. AB 469's universal mandate assumes that all students have access to adequate support—but the data here shows otherwise.

C. Quantitative Gaps Reflect Capacity, Not Student Disinterest

In a district where more than 49,000 residents are undocumented and the majority of students are Latinx or low-income, CADAA eligibility is widespread. Yet the only schools that come close to matching FAFSA completion levels are those with the lowest counselor-to-student ratios. This reveals that the barrier to success for AB 469 is not due to lack of interest or eligibility—it's bandwidth of xxxxx,

Current Administration - Student Experience and Fear

The rollout of AB 469 was designed to increase access to financial aid for all students, including those who are undocumented or part of mixed-status families. However, in Fresno (especially under the 2024–25 administration) this policy goal clashes with a political climate of intensified immigration enforcement and growing fear among undocumented communities.

In interviews and reports across the Central Valley, students and families have described how the fear of disclosing personal information, even in confidential applications like CADAA, prevents them from completing essential financial aid forms. As noted by the *Fresno Bee*, “parents worry their immigration status could be exposed simply by interacting with the school system”¹⁵. While CADAA data is protected by law, there is a widespread misconception that application data

might be shared with immigration authorities, especially as enforcement actions ramp up nationally.

According to the *Higher Ed Immigration Portal*, students in mixed-status families are increasingly opting out of CADAA because they do not feel safe engaging with government portals. One report stated that “students feel they have to choose between their dreams of college and protecting their families from exposure”¹⁶

This perceived fear is in reaction to a very real danger of federal attacks against immigrant communities. . Local school districts have had to adopt notification systems to inform parents about sightings of immigration officers near school zones. As reported by *FresnoLand*, the Fresno Unified School District began issuing alerts through ParentSquare in early 2025 “similar to how they notify families about school lockdowns or weather emergencies”¹⁷.

As one student expressed in an op-ed for *The Collegian*, “I spent more time explaining my family's situation to counselors than getting help with the application. I felt like I had to prove I was worth the support”¹⁸.



¹⁶<https://www.higheredimmigrationportal.org/wp-content/uploads/2024/09/4955086.pdf>

¹⁷

<https://fresnoland.org/2025/03/27/parents-will-be-sent-notifications-of-immigration-officer-sightings-through-the-parentsquare-app-almost-immediately-similar-to-how-the-school-district-distributes-informati/>

¹⁸ <https://fscollegian.com/2025/02/is-this-the-american-dream/>

¹⁵

<https://www.fresnobee.com/news/local/article308882615.html>

RECOMMENDATIONS

Option 1: Fund and Require CADAA - specific counselor training in high-need schools

One of the biggest barriers to CADAA completion is the lack of counselor preparation to guide students through the process. While AB 469 mandates that schools inform and support students in completing financial aid applications, it does not specify any requirements for counselor training on the CADAA—despite its unique eligibility rules and deep connection to immigration status. In many high-need schools, counselors are already managing caseloads of over 400 students. This recommendation entails collaboration between the California Department of Education (CDE) and the California Student Aid Commission (CSAC) where they develop and fund CADAA-specific training modules for counselors, particularly in districts serving large populations of undocumented and mixed-status students. These modules should be required annually and include legal updates, frequently asked questions, and scenario-based learning so that counselors are better prepared to respond to student concerns. This CADAA training should be integrated into the onboarding process for all new high school counselors in public schools as well.



Option 2: Partnerships with local legal aid and pro-immigrant organizations

However it is important to acknowledge that even with training, it can be incredibly difficult for school counselors to retain and explain complex immigration-related financial aid policies. Students may ask questions about how CADAA connects to their legal status, family risk, data privacy, or pathways to college for undocumented students. These are difficult questions that many school counselors feel unprepared to answer, especially with limited access to immigration law expertise.

That's why it is essential that school districts actively partner with local legal aid groups, immigrant rights organizations, and trusted community-based nonprofits that specialize in undocumented youth support. These partnerships can take the form of:

- Guest facilitators co-hosting financial aid workshops specifically for CADAA-eligible students and families.
- Legal experts attending parent nights and being available to answer questions in real time.
- Printed “Know Your Rights” guides available in multiple languages.

In areas like Fresno Unified, where the student population includes large numbers of Latinx, Hmong, Southeast Asian, and immigrant-origin families, these partnerships should reflect local demographics. Such partnerships would help reduce the emotional and legal burden placed solely on school staff and foster deeper trust between schools and immigrant families.

Option 3: Push for a statewide or local AB 469 Oversight Committee

To ensure transparency and ongoing improvement, it is highly suggested that California should establish an “AB 469 Oversight Committee” at either the state level (through CDE/CSAC) or as a pilot program in high-need districts like Fresno Unified. While AB 469 was passed with equity in mind, the state lacks a formal mechanism to ensure that its goals are being met. Local implementation varies significantly, and there is currently no statewide accountability system tracking whether schools are offering equitable support for CADAA versus FAFSA applicants.

This body should could include:

- School counselors and college/career coordinators
- Educators and administrators from high-need schools
- Undocumented student representatives
- Legal aid advocates
- Community-based organizations
- Higher education partners (UC/CSU reps who can clarify financial aid questions)

This committee would meet to review implementation progress, analyze CADAA completion data (disaggregated by race/ethnicity and district), identify barriers, and share best practices across districts. It could also flag disparities in counselor training and support, surface stories from students, and recommend adjustments in real time. Especially under the current federal administration, where anti-immigrant rhetoric

and policy changes may create fear around filling out forms like CADAA, this kind of oversight is vital. Students and families deserve reassurance, clarity, and consistent support when navigating financial aid, and a committee like this would institutionalize those protections.

CONCLUSION

Equity cannot be achieved through mandates alone. As this case study shows, especially in the current climate of heightened anti-immigrant rhetoric and bureaucratic precarity, successful implementation requires sustained state investment, community partnership, and policy oversight that centers students most likely to be excluded from college access systems.