



 REPORT HIGHER EDUCATION

“Free College:” Here to Stay?

JULY 12, 2018 — JEN MISHORY

Free college, or “Promise” programs—a model of student aid that covers at least full tuition costs for a subset of a given state’s residents—have received a significant boost in the past few years. A central question has been whether the model benefits from more consistent political support over time as compared to other forms of financial aid or other higher education spending. So how have Promise programs fared in retaining political support over time, and what can we learn from past experience?

Nineteen states structure at least one statewide student aid program as a Promise program; among other arguments as to their merits, proponents of Promise programs make the case that both “universal” and “free” are transformative design features when it comes to fiscal sustainability: with more beneficiaries, a clear message, and—at times—more middle class and upper-income participation, this form of financial aid is more likely to sustain political support over time. Observers often point to large-scale social programs as supporting evidence, but rarely look to existing higher education policies. Yet several states have run free college programs for many years prior to the recent upsurge in Promise program popularity, and the level of their resiliency during economic downturns can provide important lessons for overall aid sustainability and future financial aid design.

In order to explore whether a “free college” design correlates with budgetary staying power, I identified six statewide free college programs in existence during what would have been the greatest test of fiscal sustainability in recent decades: the Great Recession.¹ Like today’s free college programs, none of these state programs—in Delaware, Indiana, Louisiana, Mississippi, Missouri, and Oklahoma—are truly universal. They vary in eligibility requirements such as income caps, enrollment intensity, high school curriculum requirements, and more. As a result, some programs direct more dollars to low-income students, while others are regressive in design. But they have two core components critical to Promise design and shared by more recent programs²: they offer free tuition, and they make the benefit available to significant subset of students not determined solely by merit. The data show that in and around the time of the Great Recession:

- **The funding per full-time equivalent (“FTE”) student for all six existing Promise programs grew between 12 and 142 percent**, while overall appropriations per FTE student for higher education fell in each state between 18 and 38 percent.
- Promise programs retained and increased funding even in states where their legislatures cut funding for other financial aid programs.
- The six Promise programs grew at a time when state financial aid budgets fell by an average of 6 percent per FTE nationally.

With many independent variables and variations in program design and eligibility, establishing direct causality between “free college” and sustained funding is difficult. In order to identify trends and likely factors contributing to the sustainability of these programs, I analyzed the legislative history of the programs in each state and interviewed state aid officials and stakeholders across the six states. I found four likely factors helping to drive sustainability: 1) in some states, unique budget processes protected these programs; 2) policymakers viewed early commitment free college programs as a contract that they had an obligation to uphold, paralleling the support held by larger-scale social insurance programs—and even with programs that were restricted to low- and middle-income families; 3) programs disproportionately benefiting wealthy households did retain high levels of political support; and 4) the defined benefit structure gave champions of the programs the ability to expand program take-up even without new legislative authority.

The experiences in these six states highlight important lessons for future higher education investments. State legislators considering new college affordability programs could benefit from longer-term political support by building a program with a clear message, benefit, and commitment. But the data here show that they do not need to design a program reaching all the way up the income scale to retain that support—further supporting the notion that policymakers should ensure that free college plans do not make inequitable cost containment decisions, such as leaving out working adults, imposing stringent merit requirements, or ignoring college costs beyond tuition, in lieu of sending dollars to low- and middle-income students who need the help.³ State and federal policymakers should carefully consider the budgetary mechanics surrounding these programs to promise sustainability of well-targeted programs while avoiding crowding out important existing programs, and federal policymakers in particular can support positive benefits of well-targeted state guarantees to low and middle-income students programs by triggering countercyclical federal funding in the event of severe economic downturns.

This report examines the financial sustainability of six Promise programs during the Great Recession, analyzes which factors may have impacted state legislators' funding of these programs, and identifies lessons from the experiences of those programs that can be applied to other free college and financial aid programs going forward.

The Universal vs. Means-Tested Benefit Debate

Proponents of creating a simpler, more universal financial aid program often cite the political dynamics created by Promise, or “free college” programs, as a critical benefit of the design, presumably for a number of related reasons:

- People, including policymakers, will understand and may also then more publicly support a clear, unbureaucratic, seemingly universal benefit. A message of “free” clearly articulates the benefit available (even if other social programs may be larger in terms of actual recipients). It also clearly articulates a motivating set of values behind it—that education is a component of the social contract owed by government to its citizens in a democracy.
- If more people benefit, the expanded number of aid recipients will drive support and sustain the program over time.
- The program is likely to retain support of a wider range of political constituencies, including working class, middle class, and wealthy households that might stand to benefit.
- Public commitments to providing a well-understood free benefit make it harder to quietly cut during tough times.

These political benefits are distinct, and considered separately here, from other benefits that a more universal, free program might provide: 1) the clear message to students and families that college is affordable, which may spur more students to enroll in college than would have without hearing that message, 2) a clearer process or pathway to obtaining aid,⁴ 3) aid for middle class families who also have unmet need and struggle to keep up with rising college costs, and 4) an elevated place for higher education in the set of benefits provided to all citizens in a strong democracy.

Some proponents argue that these political benefits outweigh drawbacks that some limited public dollars will go to people who can already afford—or can better afford—to attend college.⁵ Others caution that these drawbacks are real: that our current tax system does not generate enough revenue to support universal programs robust enough to address the challenges facing low-income families—particularly not at the state level—and that states will instead send limited public dollars to wealthy students who do not need the help. Moreover, research has shown the outsized power of wealthy voters,⁶ which may translate into a move to protect their access to those dollars, at the expense of others, when states make decisions about which aspects of the programs to retain over time.

This debate is ongoing across social policy. Previous research supports the argument that a more universal program may be more financially sustainable over time,⁷ although much of the literature focuses on the enduring support for social insurance programs—where people have already directly paid into the system and expect a long-run return—such as Medicare or Social Security, rather than the universal social assistance programs, which the United States rarely provides.⁸ And Theda Skocpol's oft-cited book *The Missing Middle*, which makes the case for universal social programs, recognizes that a sustainable, robust funding stream has been critical to the staying power of those programs, and notes that state tax revenue may not be an ideal funding source for a universal social program.⁹ At the same time, critics of the more universal approach point to the expansion of means-tested programs in recent decades, such as the Earned Income Tax Credit and the Child Tax Credit,¹⁰ as well as the important role that means-tested Medicaid played in saving the Affordable Care Act,¹¹ as evidence that means-tested programs may have greater staying power than some previously believed.

The political impact of universality may be even more complex at the state level, where legislators are currently making decisions about whether and how much to reinvest in state higher education budgets as they continue to come back from cuts made during the Great Recession, but also as many must balance their budgets.¹² The interplay between the decision to generate new revenue, how to spend existing revenue, and whether to fund specific priorities within education budgets is complex. Certainly funding decisions between higher education programs do not have to be zero sum (meaning that a decision to invest in a universal aid program will not necessarily directly take dollars from other types of education spending),¹³ and political support for a program might ultimately drive a decision to increase state tax revenue over time (or end the kinds of costly tax cuts happening in revenue-poor states¹⁴) to support a larger revenue pie and a more universal program. At the same time, state legislators frequently point to real trade-offs between spending priorities in years when enough new revenue does not arrive.

We may begin to answer these state-level questions by looking at existing free college programs. About one-third of the nineteen statewide free college programs have been around long enough to measure their fiscal sustainability during the Great Recession, and those six states programs—the Delaware SEED program, Indiana's 21st Century Scholars, Louisiana TOPS, Mississippi HELP, Missouri A+, and the Oklahoma Promise—include varied levels of universality, public awareness, income limitations, and upfront requirements.

Promise Program Features

Relevant Features*	Income Cap	Median state income**	First dollar/ last dollar	Institu-tions	Early commitment requirements	Eligibility restrictions	Number of students participating***
MS	\$39,500	\$50,229	First	2 & 4	HS Curriculum	GPA, Tests, Age, FT	2,661
IN	\$45,510*'	\$61,360	First	2 & 4	7th-8th grade, HS curriculum	GPA, Age, FT	20,529
OK	\$55,000	\$57,004	First	2 & 4	8th- 10th grade, HS Curriculum	GPA, Age	18,223
LA	N/A	\$54,473	First	2 & 4	HS Curriculum	GPA, Tests, Age, FT	55,285
MO	N/A	\$62,000	Last	2	N/A	GPA, Tests, Age, FT	12,633
DE	N/A	\$72,781	Last	2	N/A	GPA, Age, FT	2,937

* Relevant features are described as they exist in 2018. Some of those features may have changed over time.

** Tim Henderson, "In Most States, the Middle Class is Now Growing-But Slowly," Pew Charitable Trusts, April 12, 2018,

<http://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2018/04/12/in-most-states-the-middle-class-is-now-growing-but-s>

***Numbers are in the 2015–2016 school year data as provided by the most recent NASSGAP survey.

****Author's calculations using data from "Current Term Enrollment Estimates-Fall 2015," National Student Clearinghouse, fall, 2015,

<https://nscresearchcenter.org/wp-content/uploads/CurrentTermEnrollment-Fall2015.pdf>.

*The income limitations are based on income and family size; this income cap is for a family of four. "21st Century Scholars: Indiana's Scholar Enrollment and Scholartrack" (Indiana Scholars), multimedia, available at "Enroll," 21st Century Scholars Indiana, <https://scholars.in.gov/parents/enroll/>.

The percentage of college students receiving benefits from these programs may seem small, but more recent “free college” programs reach similar proportions of students. The free community college program in Oregon, the Oregon Promise, reaches about 4 percent of undergraduates in the state,¹⁵ and the Tennessee Promise reaches 9.7 percent of college students in the state.¹⁶ Even the New York free college program, which covers four- and two-year institutions, currently reaches just 2 percent of students.¹⁷ And the program design features are also very similar: more recent free college plans are making familiar decisions about income caps, age, high school curriculum or GPA requirements, and other eligibility restrictions when launching new free college programs. Many of those cost containment decisions mean that some programs, particularly those that choose the more inequitable design elements over income caps, are more regressive than they may first appear.¹⁸

In other words, none of these programs are truly universal, and so the design features that each state includes impacts who benefits the most. The disparate program designs can help provide lessons learned on how the varying definitions of “universality” might impact sustainability, and whether a free college plan structured to reach more low- and middle-income families retains support. The experience of these six states in running their Promise programs, and the impact of their design on sustaining funding, can begin to inform policy decisions going forward.

Financial Sustainability of Statewide Promise Funding

One would expect demand for most forms of financial aid, as well as the need for institutional operating dollars, to grow during a recession for two reasons: people have lower incomes, and more people go back to school when they cannot find a job.¹⁹ These countercyclical demands come into conflict with significantly reduced state revenue during recessions, and the Great Recession was no exception.²⁰ State appropriations for higher education fell in forty-eight states during the Recession, including the six states with Promise Programs.²¹

TABLE 2

Changes in Per FTE Student Higher Education Appropriations in Promise States	
	Percent Change from 2006-07 to 2012-13
Delaware	-29.8
Indiana	-22.6
Louisiana	-38.1
Mississippi	-20.0
Missouri	-29.4
Oklahoma	-17.6
US National (Average)	-26.4
Source: 2017 SHEF Report, State Higher Education Executive Officers, adjusted for inflation to 2017 dollars.	

As a result, increased demand and budget cuts meant that state financial aid revenue declined by an average of 6.1 percent per FTE student between FY 2007 and FY 2013. The overall state financial aid budget declined in four of six states with free college programs. However, funding for Promise programs increased significantly throughout that time period.

TABLE 3

Changes in Financial Aid Funding in Promise States

	Percent Change/FTE – Promise Funding from 2006–07 to 2012–13*	Percent Change/FTE – Overall Financial Aid from 2006–07 to 2012–13
Delaware	11.6	-6.6
Indiana	118	-4.6
Louisiana	26.3	42.4
Mississippi	141.5	-14.6
Missouri	15	27.2
Oklahoma	46	16.2
US National (Average)	N/A	-6.1

Source: Author’s calculations of National Association of State Student Grant & Aid Programs (NASSGAP) Survey data, adjusted to 2017 dollars.

The data show correlation between a Promise structure and funding resilience during an economic downturn. **All six programs grew at a time when states across the country cut both overall financial aid budgets and higher education appropriations as a whole.**

TABLE 4

Changes in Higher Education Appropriations for Promise Programs	
	Increase in aggregate funding from 06-07 to 12-13
Delaware	\$2.17 million
Indiana	\$39.7 million
Louisiana	\$58 million
Mississippi	\$3.3 million
Missouri	\$8.4 million
Oklahoma	\$23.7 million

Source: Author’s calculations of NASSGAP Survey data, adjusted to 2017 dollars.

Even during one of our deepest economic downturns in our nation’s history—and even in several states typically known for fiscal conservatism—Promise programs survived. A review of the fiscal history of these programs during that time period can provide lessons for future program design and raise questions for further research.

Factors Driving Sustainability

Interviews with state policymakers, aid administrators, and stakeholders across six states, along with a review of the legislative history of the six Promise programs, point to four contributing factors to the financial sustainability enjoyed by these programs over the course of the Great Recession: budgetary process protections, legislative commitment to contract-like guarantees, public awareness and beneficiaries amongst wealthier constituents and in more legislative districts, and the guaranteed benefit structure that allowed champions to expand take-up within existing legislative parameters.

Budget Mechanics plus “Defined Benefit” of Free Tuition Protected Funding

The budgetary processes surrounding Promise programs in several states protected Promise programs during the Great Recession. For example, in Oklahoma, the recession of the early 2000s led to a struggle to keep commitments²² when students who had signed up and qualified for the program during the recession hit college age in 2006–2007. The legislature ultimately provided supplemental funding and took the opportunity to set up a statutory process that makes Promise funding function like an entitlement.²³ Every fall, the state regents provide an estimate of what the Promise program will cost, and the revenue for that projection comes “off the top” as a dedicated revenue source before the legislative allocation process starts.²⁴ This leaves legislative appropriators with discretion over other financial aid and higher education funding, but not the Promise program.²⁵

Additionally, several states package their financial aid allocations together, and the “defined benefit” of free tuition often receives funding ahead of other, less defined programs. In Mississippi, the legislature allocates funding for a general financial aid line item, and existing state law instructs the state’s financial aid office to fund grants first.²⁶ As a result, funding for forgivable loans—funded from within the same line item—has decreased,²⁷ while the Mississippi HELP grant has experienced explosive growth. In FY 2007, Mississippi supported just 388 students through HELP.²⁸ At the time, the agency awarded \$10 million in forgivable loans, and \$21 million in grant aid (in nominal dollars).²⁹ By 2013, the state’s total financial aid budget had grown just \$1 million, to \$32 million. But the balance had shifted, with almost \$5 million going to HELP grants. HELP now accounts for almost \$17 million of the now \$42 million state financial aid pool.³⁰ In other words, all of the growth in the financial aid has gone to HELP—a shift that has occurred despite no major legislative changes.

Similarly, in Indiana, the state agency could previously use funding from other financial aid to cover 21st Century obligations.³¹ As a result, even when overall financial aid allocations went down (in inflation adjusted terms and per FTE) during the Great Recession, aid administrators covered the full tuition benefit committed through the 21st Century Scholars program before allocating dollars to other programs. At times, this meant that funding for other aid programs decreased; for example, the dollars directed to the more traditional Frank O’Bannon aid program declined as a result.³² This budgeting mechanism, however, did not last. The legislature now allocates funding to each program separately,³³ making the change to coincide with future eligibility changes to slow the program’s growth³⁴ as recession-era middle schoolers reached college age in recent years. Even with those changes, the nominal costs increased from \$110 million to \$161 million during those peak years.³⁵

Legislative Commitments: Aid as a Perceived Contract

Stakeholders also cite both a contractual view of commitments—and relatedly, an understanding of the clear terms of that commitment amongst legislators—as key factors in long-term fiscal sustainability. In Indiana, Delaware, Oklahoma, and Missouri, aid administrators and outside advocates all point to the promise made to students in their K–12 years as motivating factors for legislators to maintain support. Several of these programs—in Indiana, Oklahoma, and Missouri—are structured as “early commitment programs,” meaning that high school students take steps to qualify, including requirements to enroll in specific curriculum, making certain guarantees about behavior and attendance, and more. Across states and political parties, state aid officials, institutional representatives, and others stated that prior guarantees carried weight for legislators.³⁶

“Those legislators who have been there since the beginning saw it as a promise and commitment made to students when they were in elementary school,” stated one community college leader in Delaware; in Oklahoma, one state aid official cited the commitment to keep that promise as “a moral obligation,” even if not a legal one.³⁷ Aid officials and advocates cite a widely held feeling that policymakers could not change the terms of the process midstream or the “terms of the contract” after students had signed up.³⁸ The programs had varying degrees of public awareness, but legislators had a high level of understanding of the program and the commitments made to students.³⁹

Observers Cite Wealth and Geographic Dispersion of Recipients as Driver of Support

In states with programs that had no income limitations, observers credit their staying power to their reach into a range of legislative districts and extensive benefits amongst politically influential constituents, tagging the programs as “untouchable.” The Louisiana TOPS grant—originally a means-tested program⁴⁰—lost its income cap in 1998 when the legislature opened it up to all students meeting their requirements, even providing funding above tuition for students meeting more rigorous merit requirements.⁴¹ During the recession, cuts to higher education, combined with a lack of significant state oversight in tuition-setting, led schools to raise tuition and drive up the cost of the program (while making it harder for non-TOPS recipients to pay for school).⁴² Upper-income TOPs participants increased dramatically over time as tuition increases made the program more appealing for middle- and upper-income families.⁴³ As a result, program participants are wealthier—and more likely to be white—than the college-going population overall.⁴⁴ In Louisiana, the median income is about \$54,000, but just one-quarter of TOPS dollars go to families earning below \$50,000—while almost half of all dollars go to families earning over \$100,000.⁴⁵ State legislators themselves point to the importance of providing “middle-class” benefits,⁴⁶ and advocates cite even a willingness on the part of state legislators to raise taxes to fully fund the program (though as a part of a package of expenditures requiring new revenue).⁴⁷

In Missouri, observers cite the participation of middle- and upper-income recipients—with connections and coming from all areas of the state—as one reason for its staying power. The Great Recession was the first time that other major financial aid programs took cuts, but A+ grew.⁴⁸ Because the program is school district-based, virtually every legislator has a connection—an A+-designated high school locally—and thus a direct line to individual voters or taxpayers who have benefited.⁴⁹ The program’s last dollar structure also means that a far greater proportion of the dollars are directed to upper income participants than otherwise would be: the median income for recipients of Missouri A+ is \$84,000,⁵⁰ about \$22,000 higher than the state’s median income.⁵¹ In total, about 70 percent of recipients come from families earning above the median income, and almost 40 percent of A+ dollars go to families earning over \$100,000.⁵² The popularity has helped the program withstand even the additional efforts needed to fully fund the program—the program at times needs (and is provided with) additional funds in a supplemental budget to meet demand.⁵³

Guaranteed Benefit Structure Allowed Champions to Drive Expansion

In some states, supportive state officials leveraged the entitlement-like, defined benefit design of the program to fuel growth even during economic downturns. In Missouri, then-governor Jay Nixon made it a campaign pledge to expand the Missouri A+ program,⁵⁴ and while he did not garner the support to expand to four-year schools as he had hoped, his support of the program led to the Department of Elementary and Secondary Education more than doubling the number of school districts with high schools with A+ designations, meaning their graduates could qualify for the free tuition scholarships.⁵⁵ The defined benefit allowed for a significant expansion in the dollars going to the program without legislative action.⁵⁶ And stakeholders in Mississippi credit the HELP program’s growth in part to an increased focus on the program from the state aid office⁵⁷ and specifically the state’s aid director, Jennifer Rogers, who worked with legislators to alter burdensome curriculum requirements difficult for some students to access, built new partnerships and engagement with schools across the state, and educated legislators,⁵⁸ counselors, and the public about the program.⁵⁹ Because the guarantee was for full tuition and not based on an overall available allocation, increasing enrollment numbers did not automatically trigger a decrease in the award.

It is worth noting that some of these factors overlapped with, or reinforced, others. For example, the legislative commitments made in Oklahoma seemed to directly influence the decision to create a separate budget processes. And the ability to drive expansion of state programs likely increased its reach and thus the staying power of the program in Missouri.

Lessons Learned and Recommendations

The experience in these six states highlights the role a range of design elements can play in retaining political support. Some programs retain significant political support but have an inequitable structure that sends a disproportionate amount of aid to wealthy families, yet other programs retain high levels of political support while limiting their dollars to low- and middle-income families and avoiding a regressive program design. Particularly given the political diversity of these six states, the programs analyzed here provide some lessons for future federal and state affordability proposals:

While reaching wealthier people can, predictably, drive political support, other factors can also drive political sustainability for more equitably designed programs. Particularly when states do not appropriate enough dollars for a universal first dollar program, creating a free, debt-free, or other similar affordability program that provides first dollar coverage for low and middle-income students, but does not go all the way up the income scale, can still benefit from heightened political support over time—while also targeting limited dollars better.

A clear message and a defined benefit carry political value. Building a program that is easier for policymakers to understand seems to help with ongoing support. Crafting programs that retain that clear message and benchmarks aid while targeting limited dollars well—a targeted debt-free structure or other clear affordability target,⁶⁰ a free first dollar program that also directs limited aid dollars to low- and middle-income families such as the Oklahoma Promise, or the targeted tuition guarantee at the University of California system⁶¹—can all build on that clear message and articulate a defined benefit without redirecting limited state financial aid dollars away from low- and middle-class families.

Budget process and funding streams matter for sustainability. At a time when states are rushing to launch the next free college program, legislators should spend time developing the budget mechanics surrounding that program. When considered alongside other aid, Promise programs can directly or indirectly crowd out other programs—which may help or harm low- and moderate-income students, depending on the structure of the Promise. In Mississippi, the state sustained a grant program reaching low- and moderate-income families by funding the program over loan options. And perhaps unsurprisingly, when aid programs have unique funding streams, it makes the program even stronger: in Oklahoma, the entitlement-like funding ensured that a program reaching low-income and middle-class families grew. These examples parallel recent findings from researchers at the Brookings Institution, who found that earmarking state lottery funds for higher education has a positive overall effect on higher education appropriations and merit aid, but a negative effect on need-based financial aid.⁶² Policymakers should, at the least, avoid budgeting structures that crowd out important means-tested programs.

Policymakers considering future aid programs can learn from the social insurance-like design of some Promise programs. Early commitment free college programs sustained support over time, with stakeholders identifying the contractual-like promise made to students as a significant driver of support. This parallels large-scale program commitments on the federal level, where several of our more universal, defined social policy programs are also designed as social insurance benefits—and retain high levels public and political support.⁶³ At the state level, well-targeted commitment or guarantee programs could be an enduring model for affordability programs. Federally, Congress can incent and support these structures by providing countercyclical funding backstops when states make smart long-term guarantees to students and families. For example, a federal-state partnership model could include a guarantee to states that a severe economic downturn would trigger additional federal support to meet (well-targeted) state commitments.

Federal affordability proposals should consider and incent strong state budgetary mechanisms. New affordability proposals should incent states to connect well-targeted and effective aid programs to more sustainable funding streams. Federal matching programs could encourage states to identify or create protected funding streams, while providing assurances to states that the federal government will support those programs during economic downturns (see above).

Conclusion

This study identified six states that ran and sustained Promise programs during the Great Recession, and identified likely drivers of that sustained support. As states consider new aid programs and the federal government plays a growing role in higher education funding, the experiences in these states can inform the design of new college affordability programs at both the federal and state level.

Methodology

In order to calculate changes over time in Promise funding and overall financial aid funding per FTE, I used inflation-adjusted data on Promise program costs, all financial aid, and the number of undergraduate full-time equivalent students from the NASSGAP survey for each relevant year. In order to calculate the change in higher education appropriations over time, I used data (adjusted for inflation) from the State Higher Education Executive Officers State Higher Education Finance report, and included all state higher education appropriations except those designated as research, special-purpose, or medical.

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Notes

1. One older Promise program, Washington's College Bound Scholars program, passed in 2007, but did not impact the state's budget until after the Recession. The California community college Board of Governors fee waiver could arguably be considered a Promise program as well, and has been around since 1984. However, its financing and administration is distinct enough from other statewide financial aid programs that I did not include it in the six programs that I analyzed here. The SEED program in Delaware only had one cohort of recipients enrolled during the first year of the time period studied, so my analysis accounted for that and made comparisons back to year two.
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10. Robert Greenstein, "Commentary: Universal Basic Low Income Attractive But, If It Occurred, Would Likely Increase Poverty Than Reduce It," *Center of Budget and Policy Priorities*, 2017, <https://www.cbpp.org/poverty-and-opportunity/commentary-universal-basic->

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11. Mark Schmidt, "Medicaid Saved the Affordable Care Act, Liberals Should Take Notice," VOX News, August 2, 2017, <https://www.vox.com/the-big-idea/2017/8/2/16083310/medicaid-targeted-aca-universal-programs-safety-net>.
12. Kim Rueben, *Balanced Budget Requirements*, Tax Policy Center, Urban Institute and Brookings Institution, 2017, <https://www.taxpolicycenter.org/publications/balanced-budget-requirements/full>.
13. And even if a legislator were making a zero-sum decision between a Promise program and, say, general operating funds that subsidize in-state tuition, it is not clear whether a "free college" program would be more or less "universal." For example, a legislature that appropriates \$50 million to an income-capped free college program may be shifting dollars from a more universal subsidy such as in-state tuition discounts, supported through general operating support to institutions, to a slightly more targeted subsidy. On the other hand, an income-blind Promise program, with, for example, limitations to full-time recent graduates, may be more regressive than the universal in-state tuition discount provided through general education appropriations to public colleges and universities.
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