Children's Savings Account Evaluation 2019 Preliminary Assessment and Recommendations

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Executive Summary

The Tacoma Housing Authority (THA) Children's Savings Account (CSA) program is a way for THA to invest alongside families in their children's future postsecondary plans. Having operated the program since 2015, THA seeks a sustainable model for continuing the CSA program and operating at a scale that extends participation and benefits beyond the Salishan community. Through a literature review, data management and outcomes measurement assessment, 67 THA family surveys, 10 parent interviews, and 13 informant interviews, BERK investigated improvements to the CSA model, two potential paths for integration, and the state of data management and reporting.

KEY FINDINGS AND RECOMMENDATIONS

CSA model

There is no known "best" model for a CSA program. Overall, rigorous evidence is lacking and limited to context-specific cases because programs are so varied. In the absence of a known ideal model, decisions should be guided by understanding of THA families' aspirations, capacities, and savings behaviors; THA's comparative advantage in the college access community; and consideration of available resources.

THA parents have high aspirations for their children. Roughly 80% responded they expected their children to attend a 4-year college. Interviewees indicated they were already or would have already been shopping for a college savings account and described investing in extracurricular activities and academic enrichment opportunities. Many parents had recently or were currently pursuing higher education themselves. Parents also indicated their children were intrinsically motivated and often were the ones pushing their parents to save for them. We also heard from stakeholders with significant experience with this population that the model specifics may be less important than the quality of the outreach and engagement that surrounds the program. Recommendations are to:

- Think of the CSA as one piece of a families' overall financial strategy, not as a "silver bullet." Financial benefits of the CSA alone are not enough to promote college access and success. Students must also be academically, socially, and emotionally prepared.

- Leverage the intrahousehold dynamics to create a program that is engaging to all generations. The conversations between parents and children can be where the most important learning and behavior change happens.

- Give families and children more visibility, power, and control over their own progress.

- Consider integrating college savings in a typical participant's interactions with THA, school, or their other financial institutions.

Partner interviewees stressed THA's unique advantage as a housing agency with access to families. They do not see THA as a content creator or deliverer, but as an essential conduit through which other providers can reach target communities. Many of the following recommendations follow a theme of right-sizing THA's role and bringing in more or deeper partnerships with partners in the areas of financial literacy, college and career, and K-12 academic outcomes. Recommendations are to:

- Use the simplest known-to-be effective design (seed, outreach, community events and reminders).

- Simplify and expand eligibility requirements, take a "supporting role" with financial literacy, and seek deeper partnership with a financial institution partner.

- Work with other community efforts such as the Tacoma College Support Network (TCSN) to be part of a more holistic approach to financial education and college planning.

Integration

We explored two potential paths for CSA integration:

- Integration with the THA Family Self-Sufficiency (FSS) Program
- Integration with Washington Student Achievement Council (WSAC) Guaranteed Education Tuition (GET) program

The feasibility of Family Self-Sufficiency integration was assessed through interviews, review of program documentation, and a review of data on the target populations. This partnership is highly feasible in one direction (bringing many FSS families onto CSA). However, the existing program would need to be maintained to remain accessible to families not eligible, not willing to engage, or having exited FSS.

The GET program allows purchasers to pre-pay for the cost of college in units equal to the cost of 1/100th of one year of resident, undergraduate tuition and state-mandated fees at Washington's most expensive public university (typically the University of Washington or Washington State University). The feasibility of WSAC GET integration was assessed through interviews and review of program documentation. The partnership is feasible in that some of the basic infrastructure is in place and the leadership is enthusiastic. We recommend additional information gathering from other state 529/CSA partnerships, and further discussion with WSAC given the significant upfront investment in outreach and software development that would be required. A grandfather or transition policy for existing account holders is another major consideration.

Data management and reporting

While there is limited research on the topic of CSA data management, it is best practice to maintain a robust system for tracking all client information in a single, integrated, and secure database environment. Tacoma Housing Authority uses Salesforce as its client management database, and it is in the process of integrating as many aspects of the CSA program into this platform as possible. However, legacy records and limited options for integrating information from partner data systems have resulted in some manual and inefficient procedures for data management and reporting that are neither sustainable nor scalable. These practices also increase risks of data entry error, insufficient documentation (particularly in the event of staffing changes), and accidental exposure of private information. Fortunately, there are technical solutions to these challenges and THA has staff expertise and capacity to support implementation.

As THA continues to move forward with modernizing its data management activity in the Salesforce platform, we recommend the following:

- Continue to invest in Salesforce to improve efficiency and data management by automating or streamlining workflows, such as incentive tracking or providing families with account statements.

- Work with partners to update data sharing agreements and protocols to improve administrative efficiency, reduce burdens on partners for technical support, and improve data security.

- Consider changes to data collection and outcomes measurement in conjunction with broader decisions about CSA model design and integration.

- Collect academic outcomes data in a format that enables flexibility for future evaluation studies.

- Consider new performance measures that focus on student growth over grade performance.

Program Background

The Tacoma Housing Authority (THA) Children's Savings Account (CSA) is a program that seeds and matches family contributions to savings accounts to support college going and success. For elementary school students THA provides the initial seed of $50 and matches family deposits up to $400 per year. During middle school years, an incentive scheme links student academic, college and career readiness milestones and actions with THA deposits of up to $700 per year. Participants are also offered financial literacy classes and resources. The THA portion of funds is made available after high school graduation for continuing education and training purposes. Students who do not continue forfeit the THA portion of funds. THA partners with Heritage Bank for banking the CSA and since launch in 2015, the program is available to Salishan residents with children in Tacoma Public Schools (Lister Elementary and First Creek Middle School), and other families at those schools. No participating students have yet reached the point of fund disbursement.

Program goals

THA has identified several short- and long-term goals, or "expected outcomes", which it hopes to promote and measure through the CSA program. These outcomes are listed in Exhibit 1.

Exhibit 1. Expected Outcomes of the CSA Program

FOR STUDENTS	FOR FAMILIES
Short-term Expected Outcomes (1-3 years)	
- Students are meeting or exceeding the district benchmark of a 92% attendance rate (all) - Students avoid serious disciplinary actions like long-term suspension or expulsion (all) - Students participate in a financial literacy program at least once every school year (all) - Students make progress toward meeting Scholar Incentive Program Milestones (secondary)	- Families are making deposits into students' accounts with some regularity. - Families are taking advantage of opportunities to participate in a financial literacy program - Unbanked, but bankable families get banked. - Eligible THA households engage with THA Community Services for the first time or at a higher level. - Eligible heads of household enroll in the Family Self-Sufficiency Program
Intermediate Expected Outcomes (4-5 years)	
- Students' account balances are growing. - Students are reading at grade-level - Student avoid serious disciplinary actions - Students make successful transitions to high school	- Families are making deposits into students' accounts with some regularity - Unbanked, but bankable families get banked
End Expected Outcomes	
- Students graduate from high school or equivalent - Students enroll in a postsecondary program within one year of graduating from high school or equivalent - Students earn a postsecondary degree or credential - Students are employed or continuing their education within one year of earning a postsecondary degree - Students are achieving economic self-sufficiency	Families remain banked

Program outcomes

THA has enrolled 189 students in a CSA since the program launch in 2015, increasing the number of participants added each year through the end of 2018. Outreach and recruitment activity were heaviest in 2015-2018.

Exhibit 2. Tacoma Housing Authority CSA Enrollment
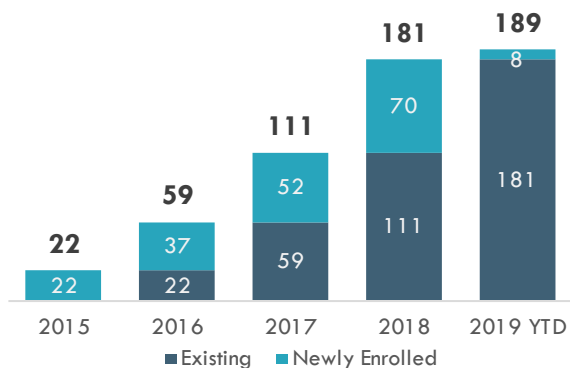
- **136** participants (72%) are housed through a THA program
- **95** are in elementary school
- **94** are in middle/high school

Sources: Tacoma Housing Authority, 2019; BERK Consulting, 2019.

Exhibit 3. CSA Enrolled Student Demographics (n=189), All TPS Student Demographics (n=33,582)
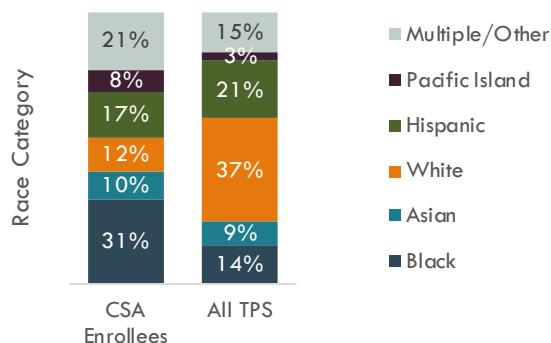
- **88%** of CSA enrolled students in Spring 2019 were a race other than white
- **63%** of all Tacoma Public School students in Spring 2019 were a race other than white

Sources: Tacoma Housing Authority, 2019; Tacoma Public Schools, 2019; BERK Consulting, 2019.
Note: Students in the Hispanic race category were assumed to be non-white and not included in any other category. The U.S. Census Bureau considers race and ethnicity (such as Hispanic heritage) to be separate and distinct concepts.

Student attendance

Goal: Students are meeting or exceeding the district benchmark of a 92% attendance rate (elementary & secondary).
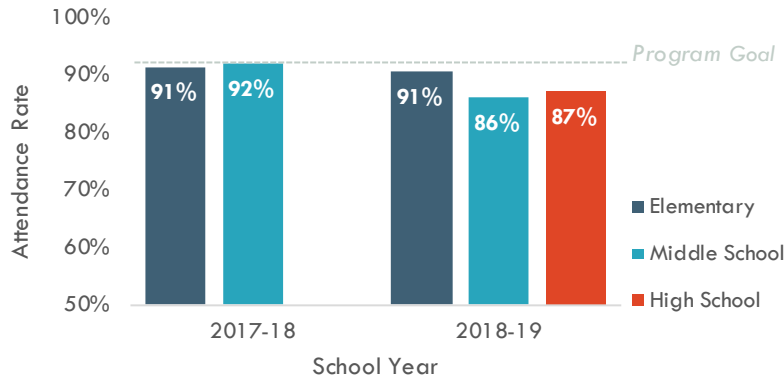
Attendance goals were mostly met for the 2017-18 school year.

As the program expanded in the 2018-19 school year, middle school attendance rates fell below program goals. The first high school participants had below goal attendance.

Sources: Tacoma Public Schools, 2019; BERK Consulting, 2019.

Student discipline

Goal: Students avoid serious disciplinary actions like long-term suspension or expulsion (elementary & secondary).
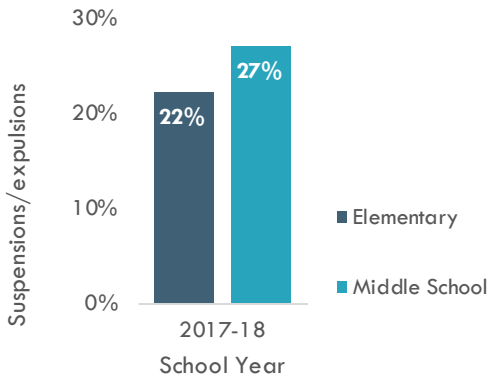
22% of elementary CSA participants and 27% of middle school CSA participants faced school discipline. The CSA program provides a financial incentive to students who receive zero days of suspensions or expulsion.

Discipline rates can vary based on school and district policies, and national data shows disparities in student discipline exist based on race, disability, and gender.

Sources: Tacoma Public Schools, 2019; BERK Consulting, 2019.

Family account deposits

Goal: Families are making deposits into students' accounts with some regularity.
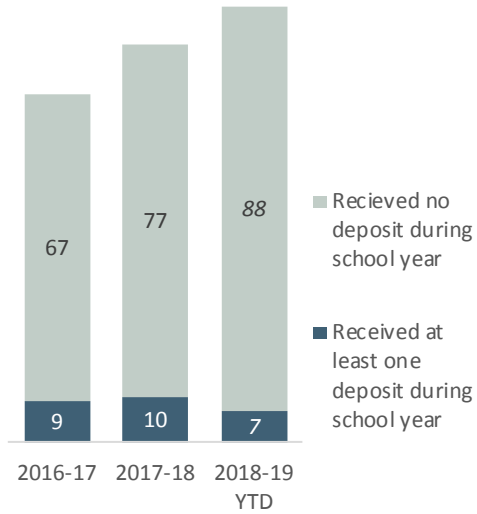
A total of 62 family deposits across **16 unique elementary students** were recorded in last three school years. One family accounts for 30 of those deposits. The chart shows for each school year the number of students receiving any deposits compared those eligible for deposits but who did not receive any. Students who received deposits in multiple years show up for all years they received them.

The regularity of deposits is not measured due to the lack of data and no definition of regularity. However, among the 16 unique students who received any deposits, half have received only one deposit and half have received multiple.

Sources: Tacoma Housing Authority, 2019; BERK Consulting, 2019.
Note: The school year was generalized as September 1 through August 31 of the next calendar year; the 2018-19 school year figure is year-to-date, and the final number may increase.

Student and family financial literacy program participation

Goal: Families are taking advantage of opportunities to participate in a financial literacy program

Goal: Students participate in a financial literacy program at least once every school year (elementary & secondary).
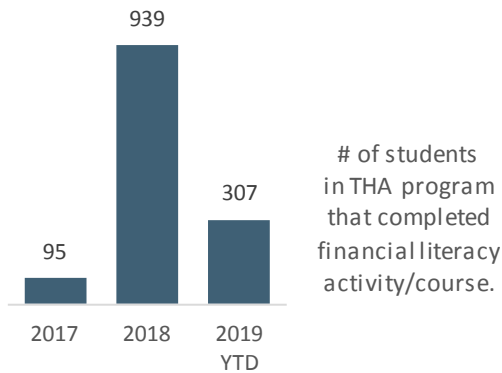
The CSA program began conducting financial literacy in the 2016-2017 school year. Financial literacy programming takes place in the school and is available for all students. The data shown reflects all students, and disaggregation by CSA participation is not possible at the time of this report. 2018-19 enrollment at Lister Elementary was 486 students and 791 at First Creek for a total of 1,277 possible participants (74% participation).

Family participation is not consistently tracked at this time except for those also participating in FSS.

Sources: Tacoma Housing Authority, 2019; BERK Consulting, 2019.

Currently unmeasured program goals

Not all program expected outcomes listed in Exhibit 1 are currently measured, which are noted below. Additional details about data reporting and program manual goals are shown in Exhibit 5 for students and Exhibit 6 for families. Some of the indicators are less readily available because of limited access to academic and banking information. Some limitations are due to current THA data and reporting that is based on aggregations that limit longitudinal assessments of program effectiveness.

Student scholarship incentive milestones Goal: Students make progress toward meeting Scholar Incentive Program Milestones (secondary)	Current incentives include: GPA, attendance, academic preparation, extracurricular activities, financial literacy, exploring careers, discipline, and engagement in summer CSA opportunities. Some limitations to tracking and measuring progress towards milestones are due to challenges in accessing academic data and data limitations to confirm individual students' progress over time. Tracking individual student scholarship over time will help measure possible goal progress based on the length of time students were enrolled in the CSA.
Family banking status Goal: Unbanked, but bankable families get banked.	Staff are not currently collecting. There is no definition of bankable. With a definition THA case managers could potentially gather this information for new enrollees and survey existing participants.
THA household community services participation Goal: Eligible THA households engage with THA Community Services for the first time or at a higher level.	Staff are not currently collecting. There is no defined set of community services or definition of "levels" of participation. If defined, THA could use Salesforce to build and track this information. Participation data would need to be entered by staff and/or collected from partners service providers. THA may consider measuring this qualitatively.
Family enrollment in self-sufficiency program Goal: Eligible heads of household enroll in the Family Self-Sufficiency Program	It is currently possible to run reports in Salesforce identifying heads of household associated with both programs for reporting. However, this has not been integrated into reporting available during this program evaluation.

Evaluation Objectives and Approach

THA currently seeks a sustainable model for continuing the CSA program and operating at a scale that extends participation and benefits beyond the Salishan community. The evaluation objectives in 2019 are to explore the:

- **CSA Model.** Compare seed and scholarship model to the current seed, match, and incentive model in terms of participation outcomes and costs (including administrative burden)

- **CSA Integration.** Understand the feasibility (infrastructure and resources required, administrative model) of integrating the CSA with other programs including:

  - Guaranteed Education Tuition 529 Program (GET) administered by the Washington Student Achievement Council (WSAC)

  - Family Self-Sufficiency (FSS) Program administered by THA

- **Data and Reporting.** Establish streamlined data collection and reporting methods that can support measurement of short- and long-term program outcomes

This report addresses the above topics drawing from data and analysis four streams of work:

1. **Literature review.** BERK conducted a targeted review of research literature and best practice documentation using sources provided by THA and an online search for additional relevant resources.

2. **Data management and outcomes measurement.** BERK reviewed data products provided by THA against funder requirements and other reporting needs and interviewed data administrators at THA and other partners.

3. **Community consultations.** BERK surveyed and interviewed THA families. Sixty-seven families participated in the survey and 10 participated in an in-depth interview in-person or on the phone. Detailed survey results are in the appendix.

   - 20% of survey respondents were CSA participants.

   - Most who attended the in-person interviews were saving or prioritizing getting started on savings accounts for their kids.

   - The top identified race categories were (note respondents could select more than one to identify with):

     - 52% Black or African American

     - 30% Non-Hispanic White

INFORMANT INTERVIEWS

- Alyssa Torres, KBTC

- Amanda Figueroa, University of Washington

- Amanda Kinder, Heritage Bank

- Amanda Scott-Thomas, Tacoma Public Schools

- Betsy Hagen, Washington Student Achievement Council

- Cindy Atwood, Heritage Bank

- Elvin Bucu, Foundation for Tacoma Students

- Luke Minor, Washington Student Achievement Council

- Nicole Meshesha, Family Self-Sufficiency

- Sharon Fletcher-Jackson, Family Self-Sufficiency

- Shaun Carson, Heritage Bank

- Stephanie Christy, Salishan Association

- Thu Ament, Tacoma Public Schools

- 16% Hispanic/Latino

- 13% American Indian/Alaska Native

- 11% Asian

The outreach for the community consultation relied on THA-wide events hoping to get a cross-sampling of eligible families. However, participation from CSA families was lower than expected. We also experienced lower than expected turnout at pre-scheduled focus group discussions. Based on this experience, we intend future outreach to target CSA families specifically, to rely on phone interviews instead of in-person discussions, and to further leverage the over 60 families who provided contact information in the survey indicating they would be willing to be interviewed.

4. **Informant interviews.** BERK interviewed current and potential future program partners. Thirteen individuals participated in an interview. Names and organizations are listed in the sidebar on the previous page.

We conclude with some preliminary recommendations on scale and sustainability. These recommendations will be further refined through reflection with the THA Board and Staff to be finalized in our 2019 evaluation report. Attached to this report is a data brief intended to support THA's report for College Spark and detailed survey results.

CSA Model

SUMMARY FINDINGS

The CSA Model design should be based in available research and in a solid understanding of the local context of THA families' desires and behaviors. Overall, rigorous evidence is lacking and tends to be limited to context-specific cases because CSA programs are so varied. Based on our review, the only program elements with evidence of positive correlative outcomes are:

- Opt-out model with *overall participation rates*

- Initial seed deposit with increased *asset accumulation*

  - No further evidence on the seed amount

- Classroom bank field trips and a workshop for families with increased *families' usage of CSA*

- Time limits and reminders with increased *engagement* (more so than incentives)

Available evidence on two features of the current THA model, a savings match and an incentive structure, has been inconclusive.

When asked about their preferences between the current match model, and a simpler scholarship model, families indicated their criteria to be:

- Whichever model resulted in the highest total dollar amount from THA

- Whichever model rewarded families for non-monetary behaviors (i.e., it is easier to go to a PTA meeting or write a personal statement than to find money to put away)

Overall, interviewed parents indicated they were already or would have already been shopping for a

college savings account. The potential to draw down additional money was the key advantage of this account over others available. In other words, the availability of THA CSA influenced the choice of *which* account, not *whether* to open an account.

What motivates families to participate in THA support programs? What attracts them to the CSA program?

- Children's interest in their own potential and educational goals. Parents reported their children were hopeful and encouraging their parents to help them prepare for college and initial career investments.

- Parents' personal experience with higher education or the lack of. Families knew how expensive education was for them and lack of access to resources, and savings promotes urgency in saving and planning among their kids. Several parents interviewed were currently, or had recently, pursued their own education plans such as high school completion or nursing degrees.

- Parents' own financial literacy (other THA program requirements) or professional backgrounds has them investigating savings and potentially interested in the CSA. A few parents interviewed indicated working for a credit union.

- Visibility. Parents reported hearing about the program and then getting interested in saving for college after hearing about it in Salishan or handouts and promotion from their kid's school or a THA caseworker or staff member they are already involved with.

  - A few parents mentioned staying current on what is happening at the FIC and learning about the CSA program that way.

What are THA parent and family expectations around college-going? What are families doing to prepare for college? What more do they need?

Most families express desires for their children to pursue higher education. About 80% of survey respondents expected their children to attend 4-year colleges. Families were sure to mention that they wanted their children to pursue their personal goals and follow their passions and interests but felt that that was important to align that with professional certification of some sort. During interviews, 4-year college and advanced degrees were the most common answer. Technical school programs were also mentioned for some kids both for their lower costs and the more limited time needed to complete the program, and for families who were considering their children's learning disabilities.

Parents with very young children were less focused on what their child might be when they grow up and viewed them more directly in the context of their own education pathway. Parents with more creative and artistic children mentioned interest in understanding ways in which they could help set goals and nurture parallel professional interests.

Families talked about taking education initiative at home especially in STEM subjects beyond school requirements. Many of the families who engaged had self-motivated kids who were interested in learning on their own and were happy to engage in college prep and working towards their CSA incentives. Based on comments some families might like support for:

- Mentorship for education and career choices for creative professions

- Educational goal setting for children with learning disabilities, those who are differently abled or

behind on milestones

- Assistance and education on scholarships, Financial Aid options beyond what parents can save. Many parents were concerned about loans so they might want to better understand alternatives as well as ways to responsibly navigate loans.

How do families think the current model could be improved?

Families mentioned ways that information and knowledge sharing could improve, administrative changes that would help the program better fit their needs and the needs of the broader THA community. Two of the concerns that came up most often centered around parents wanting their kids to receive all the THA funds that were available to them without relying on the family to be able to match or save at a prescribed pace. This was especially true of parents of siblings who had to split their individual investments among their kids. The second big concern was around accessibility and consistency, in sum they largely believe all THA clients should be able to enroll in the program. For example, some families found that some of their kids qualified while others did not or families needed to transport their kids to schools out of the current system to mesh with their work or childcare needs, among others.

Administrative suggestions included:

- More regular bank statements and online access to account activity and balances

- Access to the bankers and "local" customer service (versus automated or non-local) representatives. Preferences for a bank they could otherwise comfortably bank at based on their perceptions, credit history, limits on fees and hours of operation.

- Measurable milestones for students to track and work towards as they move through school. Measures and incentives should be equitable and inclusive so that they are still accessible to students with different cultures, learning styles/abilities/objectives as well as differing lifestyles and home responsibilities.

- Ways for children to directly participate in the saving and depositing process.

Some limitations of the focus groups centered around the amount of families reached and the diversity of the participants. For future focus groups more advanced notification and a consistent rsvp process would be helpful. We did not clearly hear from fathers, two-parent households, or double-income families in the focus groups which may or may not lead to a different set of questions and concerns. These families seemed eager and comfortable sharing but because it is a dialog around finances some families might benefit from both written and conversational engagement in the groups in case there are topics or questions, they may not be comfortable bringing up to the group or wish to keep that item dissociated from their identity. Moving forward it would help if there was something either written about saving or information about other allied programs so that families that do not currently qualify do not feel discouraged and continue to communicate with THA for future involvement or knowledge sharing with other parents. Some mothers at the focus groups also mentioned limited involvement with mothers' groups, local groups like this (gendered and non-gendered alike) could be a helpful trusted resource in dispersing information about the CSA and how it could benefit their child.

What is the relative effectiveness and impact of various CSA program design elements, such as incentives for attendance, behavior, and academic success, financial literacy classes, scholarships, and creating a culture of college-and-career focus among program participants?

To date, research on the relative effectiveness of CSA program design elements is limited. Many features are untested, and no study exists that directly compares the effectiveness of different design elements.

One of the roadblocks to collecting this evidence is that existing CSAs have different goals, and the effectiveness of a given design feature depends on a program's goals. For example, according to a 2018 Prosperity Now report (Markoff, Loya, & Santos, 2018), an initial deposit by a CSA program into a child's account has a strong positive correlation with the total balance of a child's account, but no correlation with family contributions to a child's account. Therefore, seed deposits are an effective design element if a program's goal is to maximize the dollar amount of a child's college savings, but ineffective if a program's goal is to maximize family contributions to a child's college savings.

Further, comparison between existing CSA programs is unviable because programs have different target populations, partners, and resources. As a result, many CSA programs rely on a trial-and-error approach to select the program features that are most effective for their own goals.

While trial-and-error is imprecise, this practice enables us to use the proportions of programs that use particular design elements as a proxy for the effectiveness of these elements. According to a 2019 Prosperity Now study of 61 CSA programs (Quezada, Markoff, & Copeland):

- 74% of programs provide an initial deposit.

- 64% of programs provide a savings match.

- 46% of programs provide benchmark incentives.

- 28% of programs provide prize-linked savings.

Given that over half of CSA programs include initial deposits and savings matches, we can conclude that these design programs are relatively effective for existing CSA programs.

While research is overall limited, there is some preliminary evidence that certain design features are more effective than others.

1. Evidence from San Francisco's Kindergarten to College program indicates that time limits (e.g., "Challenge" campaigns for families to contribute by a given date) and reminders to contribute can increase engagement more than incentives.

2. Additional evidence from San Francisco's Kindergarten to College program indicates that a classroom bank field trip combined with a family CSA workshop is positively correlated with families' usage of the city's CSA program, but other outreach activities are not.

Research also indicates that some design features are likely ineffective.

1. There is no evidence that attendance incentives in CSAs impact rates student absences. This is likely because student absences are often due to family challenges and other barriers that CSA programs cannot influence through incentives.

2. Findings from a 2013 meta-analysis of 201 studies of the effectiveness of financial literacy (not necessarily within the context of CSAs) show that financial literacy education impacts only 0.1% of

variance in participants' financial behavior (Fernandes, Lynch, Jr., & Netemeyer, 2013). Despite this significant finding, the consensus in academic literature is that financial education is effective.

Overall, research is lacking. Not only is there a need for additional research, but there is also a need for an effective way for CSA programs to better compare findings and successes.

What was parent feedback on specific CSA model elements? Did parents prefer seed, match and incentive versus seed and scholarship?

▪ Parents preferred seed and scholarship as their kids were able to receive the full amount offered regardless of their ability to save to prompt the matching. They did hope that a scholarship model would be accompanied with great transparency and visibility into the account activity, and milestones or markers to help students stay motivated until graduation.

▪ There were also comments that they hope the scholarship model would help them prepare in applying for other scholarships and funding.

What work has been done in other CSA programs to address or evaluate the role of racial, cultural, or ethnic barriers and inequalities that can impact program effectiveness?

Programs are working to identify the specific needs of the communities they aim to reach, and to target outreach and design programs in a way that is culturally informed. Research and experience suggest incorporating the following tactics to overcome racial, cultural, and ethnic barriers to CSA effectiveness:

Conduct outreach outside of traditional institutions.

Staff at the SoarMA program in Massachusetts and at San Francisco's Kindergarten to College (K2C) program have found that some of their target groups, including immigrants and communities of color, often mistrust government institutions and the banking system. SoarMA responded by conducting educational programs at religious institutions and community organizations instead of at government buildings and schools. K2C responded by partnering with trusted community institutions that lend their credibility with target populations to the CSA program.

Offer workshops outside standard work hours.

Staff at the Inversant program in Massachusetts found that families of their target populations were largely unavailable to participate in CSA outreach and education programs during standard work hours. Inversant responded by offering workshops in the morning and evening.

Consider the needs of participants with limited English proficiency or residents without documentation if a CSA program connects with a 529 plan.

A participant with limited English proficiency, such as a recent immigrant, may struggle to understand the legal terms and conditions of opening a 529 account. Programs can provide multilingual assistance to support these participants. Additionally, programs can incorporate designs that allow a participant without a Social Security Number (SSN), such as an immigrant without documentation, to participate. For example, account custodianship by the CSA program sidesteps any legal requirements for account beneficiaries to have SSNs.

Design a program to be universal (i.e., available to all students), automatic (i.e., opt-out instead of opt-in), and progressive (i.e., offers more subsidies for children with fewer assets or advantages).

Universal, automatic, and progressive CSA design addresses several racial, cultural, and ethnic barriers.

- A 2018 modeling study by Prosperity Now shows that a CSA program with a large initial deposit and a universal, progressive design could close the black/white wealth gap by 23% and the Latino/white wealth gap by 28% (Markoff, Loya, & Santos, 2018).

- Children of color are more likely to have low institutional efficacy. Progressive designs may help overcome this barrier.

- Automatic enrollment helps overcome language barriers to parents with limited English proficiency, such as recently arrived immigrants.

- Opt-in programs favor parents with more education and financial assets. Automatic (opt-out) enrollment helps address this inequity. The Harold Alfond College Challenge is an example of a program that switched from opt-out to opt-in enrollment as a result of this finding.

Offer outreach in multiple languages.

To reach populations with limited English proficiency, several programs offer workshops and materials in multiple languages. Nevada College Kick Start conducts outreach and provides materials in Spanish and English. K2C conducts outreach in three languages. Inversant hires local facilitators fluent in languages common to local populations, including Spanish and Khmer.

Offer in-person deposits.

Prosperity Now has found that the ability to deposit funds in person at financial institution branches is especially important for low- and moderate-income communities of color.

CSA Integration

SUMMARY FINDINGS

We explored two potential paths for CSA integration:

- Integration with the THA Family Self-Sufficiency (FSS) Program

- Integration with Washington Student Achievement Council (WSAC) Guaranteed Education Tuition (GET) program

FSS Program

The feasibility of Family Self-Sufficiency (FSS) integration was assessed through interviews, review of program documentation, and a review of data on the target populations. This partnership is highly feasible in one direction (bringing many FSS families onto CSA). However, the existing program would need to be maintained to remain accessible to families not eligible, not willing to engage, or having exited FSS.

There are many factors in favor of integrating the CSA with FSS. The average FSS participant is a

woman with two school age children who could benefit from the CSA program. An early analysis demonstrated that FSS families who were also on the CSA program were the most active depositors. The current FSS pay point structure could easily accommodate a set of pay points related to college savings and preparation.

Integration of the CSA with the FSS would give participating families access to other FSS resources such as financial coaching on-site at Salishan. These coaches can work with families' individual situations and importantly for the CSA, locate college savings in the context of their other goals. The prospect of integration is attractive to both CSA and FSS administrators because of the potential for a dual-generation approach where parents and children can support each other. This is further supported by the fact that several of the parents interviewed about the CSA had recently or were currently pursuing their own higher education goals. FSS has the resources to help families consider all those things together, and to create a "path the family can walk together" rather than separating parent and children's needs.

FSS also has a separate HUD funding stream that recently celebrated 25 years and is likely more sustainable than the grant funds currently supporting the CSA program. Many of the limits of the program are HUD-defined, so while potentially more sustainable, the funding is also more restricted.

FSS is a higher barrier time-limited program available only to work-able heads of household. Families sign a five-year contract with high standards of participation. If the CSA administration and data sharing processes are sufficiently streamlined, simply adding CSA related pay points would require slightly more effort to support each family. FSS caseloads are currently at 60-65 per caseworker. THA would need to consider FSS and CSA resources together to re-design for an integrated reality.

GET Program

The GET program allows purchasers to pre-pay for the cost of college in units equal to the cost of 1/100th of one year of resident, undergraduate tuition and state-mandated fees at Washington's most expensive public university (typically UW or WSU). The feasibility of WSAC GET integration was assessed through interviews and review of program documentation. The partnership is feasible but would likely require significant upfront investment in outreach and software development.

WSAC has a clearly aligned mission to "advance educational opportunities and attainment in Washington." They are enthusiastic about the opportunity to advance their mission through partnership with the THA CSA Program, including the support of the Executive Director. There are several other national examples of CSA programs using their state 529 as the account holder.

WSAC currently operates a master scholarship product for several philanthropic organizations that run their own scholarship programs using GET funds. This entails an omnibus account held by the organization that can either be linked to subaccounts for students (run like a savings program) or disbursed to students at a given date (run like a scholarship program). This existing infrastructure would be a good basis for a THA CSA account. They have a clear disbursement process already in place for students going on to postsecondary plans.

WSAC also has a dedicated team of six software developers available to customize the GET product to this specific use case. They would be able to import and export data at scale and customize the Master Scholarship program to track and link matches between the omnibus and subaccounts.

The larger WSAC organization also administers several other programs, such as the College Bound Scholarship, and has dedicated outreach resources for college planning. Partnership between the two organizations could potentially bring more of these resources to the THA community.

Most families interviewed had not heard of the GET Program, however the concept of pre-paid tuition is intuitive and attractive to families as they were well familiar with the narrative around rising costs of college. However, the calculation of the GET units and the nuances of fees charged for the units are less well-understood. This is further complicated by the temporary suspension of the GET program when the cost of tuition unexpectedly dropped in 2015. The program may be seen as complicated and risky.

Some costs for the GET program administration are embedded in the price of GET units. Further, for the use of the Master Scholarship account, there is a $100 set-up fee and a $25 fee per student account. There are no management fees as in the DreamAhead program. While the program administration fees are not large and are likely offset by the growth of the units as compared to a retail savings account, the idea of paying those fees may be a psychological barrier to some families.

Families are not aware of WSAC and its role and mission are less easily understood than that of a bank or credit union, for example. A few families expressed a preference for banking with "local" people and the comfort of knowing your money is somewhere close with human interaction.

One of the biggest barriers to working together would be the inability for GET to accept cash deposits. Creating other ways to deposit money that are designed for THA families (via rent payment screens, direct deposit etc.) will be crucial. With appropriate tracking, there may be a way for THA to accept cash deposits on behalf of families and transfer funds via their omnibus account.

While not anticipated to be a direct barrier, WSAC is a cabinet-level state agency with statutory bounds on its activities. Partnership with THA is fully expected to be within those bounds, with a caution that this partnership has exposure to the legislative process.

Are there other examples of local CSAs integrating with statewide 529 programs or FSS programs? Have these been successful and what are the lessons learned?

Just over half (52%) of CSA programs use 529 plans to hold CSA funds. The programs that incorporate with statewide 529 plans serve a larger number of participants than those that do not, so these programs include 84% of CSA participants (Quezada, Markoff, & Copeland, 2019). The following table shows some of the characteristics of four of the nation's most prominent CSA programs that integrate with statewide 529 plans.

Program name	Who administers the 529 plan?	Who holds the 529 account?	Other entities involved in outreach and education	Who funds?
Promise Indiana	CollegeChoice Direct 529 (Indiana's state 529 plan, offered by Ascensus College Savings)	Participant.	Schools.	Initial deposit: economic development, local gov't, and community foundation interests. Subsequent matches: participant's employer.
Rhode Island CollegeBound Baby	CollegeBound Saver and CollegeBound 529 (Rhode Island's state 529 plans,	Participant.	None.	Donations and fees from Ascensus College Savings

Program name	Who administers the 529 plan?	Who holds the 529 account?	Other entities involved in outreach and education	Who funds?
	offered by Ascensus College Savings and Invesco Advisers respectively).			and Invesco Advisers.
Nevada College KickStart	SSGA Upromise 529 Plan (Nevada's state 529 plan, offered by Ascensus College Savings).	Ascensus College Savings.	Schools.	Grants, private sponsorships, and program management fees. No taxpayer dollars.
San Francisco K2C	Citibank.	City and County of San Francisco under its tax ID number	Volunteer school staff and community members.	Initial seed: city of San Francisco. Subsequent matches: private philanthropy.

There are several advantages to integrating a CSA with a statewide 529 plan.

- 529 plans offer participants the opportunity to have their savings benefit from market growth, rather than stagnating in savings accounts.

- A 529 plan's centralized platform makes CSA program administration more efficient.

- Savings in 529 accounts are not included in federal SNAP calculations and are not included in some state public benefit calculations.

- Omnibus 529 accounts allow larger, more profitable accounts (in terms of fees paid to providers as percentage of market profits) to subsidize smaller accounts

There are also challenges to integrating a CSA program with a statewide 529 plan.

- Complex forms and agreements associated with opening a 529 plan can be challenging for participants, especially those with limited financial education or limited English proficiency.

- The financial benefits to 529 plans are often in the form of tax deductions and exclusions, rather than refundable credits, which is less advantageous for lower-income families with less taxes.

- Many 529 plans have high minimum deposits and required fees, limiting access to lower-income participants.

- Some states don't allow cash deposits to 529 accounts, an option that can be especially important for people of color and people of different abilities, who are more likely to be unbanked.

- Although 529 savings can grow with the market, they are also susceptible to market losses, which can be particularly tough for low-income families.

While the above list is significant, some programs have worked with 529 providers to mitigate disadvantages. For example, Promise Indiana lowered the minimum initial deposit in a 529 account from $25 to $10, and have partnered with local banks to enable CSA participants to make in-person deposits into their 529 account at a bank. Additionally, VistaShare and Ascensus College Savings announced a joint project in 2015 that simplifies process of CSAs using an omnibus 529 account.

Fewer CSA programs integrate with Family Self Sufficiency programs than with state 529 plans. However, one example is the Amy S. Anthony CSA, hosted by Missouri-based Preservation of Affordable Housing (POAH). POAH opens a CSA for every child between the ages of 5 and 19 whose family participates in the FSS program and lives in POAH's Hawthorne Place housing. POAH offers financial coaches, workshops, incentives, and more to support these participants.

How familiar are CSA target families with the GET 529 and other savings and planning programs; or the FSS program? What would it take to get them to enroll?

▪ None of the THA families interviewed had heard of the GET 529 plan. One said it sounded familiar when provided with a program description.

▪ Families who had shopped around for college savings plans had checked retail bank and credit union offerings.

▪ Several families were familiar with FSS. FSS staff indicated a large majority of their clients would be eligible and interested. THA's own analysis shows that the most active CSA accounts come from those on FSS.

▪ While unfamiliar with the specific program, parents found the concept of "pre-paid tuition" very attractive.

Data Management and Reporting

SUMMARY FINDINGS

Our review of data management and reporting practices at THA included four key elements:

1. Best practices for data collection, management, and reporting
2. Current data collection tools, systems, and procedures
3. Types of data needed to issue incentive payments and comply with reporting requirements
4. Types of data needed to effectively evaluate program impacts

While there is limited research on the topic of CSA data management, it is best practice to maintain a robust system for tracking all client information in a single, integrated, and secure database environment. THA's own data management practices have evolved in the years since the program began. During the early stage of the program development, many of their data management practices were impromptu and scaled to the immediate needs of a small program. However, two years ago THA began developing a robust client data management system using the Salesforce platform. They have since been in the process of integrating as many aspects of the CSA program into this platform as possible. While they have made large strides towards data management modernization for the CSA program, legacy records and limited options for integrating information from partner data systems have resulted in the continuation of some manual and inefficient procedures for data management and reporting. These practices are neither sustainable nor scalable. They also increase risks of data entry error, insufficient documentation (particularly in the event of staffing changes), and accidental exposure of private information.

Fortunately, there are technical solutions to these challenges and THA has staff expertise and capacity to support implementation. Additionally, the TPS liaison appears willing to assist in providing more efficient and direct access to academic outcomes data. These changes could have a significant positive impact on THA's administrative efficiency. They can also enable other ways of collecting and managing academic outcome data to provide additional flexibility for future outcomes evaluation. Similar support from the financial institution partner would be necessary to streamline how THA manages account activity data, and how it provides access to account information for CSA participants.

What are best practices for streamlined participant data collection, management, and analysis that promote/balance administrative efficiency, data reliability, participant privacy, and the ability of program administrators to effectively evaluate program impacts?

A report on CSA information management developed by Prosperity Now identifies the key components that a robust CSA data management system should include. These components are summarized in Exhibit 4. It also reviews four online platforms that have been designed specifically for CSA account and data management. Each platform has benefits and limitations with regards to each of these data management components. Some of the platforms require the CSA to be associated with a particular financial institution or 529 program as a prerequisite to use.

Exhibit 4. CSA Data Management Components

SYSTEM COMPONENT	SELECT FEATURES OR CHARACTERISTICS
Administrative Interface	The administrative interface helps track program needs and client data.
User Interface	The user interface allows the CSA participant to view account information and communicate with the program administrators/contacts.
Account Management	The student or guardian account is opened, closed, and maintained by program administrators. Accounts may have unique identifiers that help them be associated across programs or organizations.
Data Management	The process/tools used to enter or import data.
Reporting	Displaying individual or aggregated data in customizable formats.

Sources: Prosperity Now, 2019 (adapted); BERK Consulting, 2019.

Program design is an opportunity to lay the groundwork for effective practices for data collection and analysis. CSA programs can incorporate into their design data sharing agreements with other parties that are involved in the program, including financial institutions, school districts, and data analysis contractors. Before launching, CSA programs can also work with supporting financial institutions to identify any special needs of the program.

At enrollment, CSA programs have a uniquely focused opportunity to collect data from participants and their parents. This is an opportune time to ask parents to give the program permission to share their children's data with third parties to allow the program to evaluate and research its effectiveness with the support of a third-party evaluator.

Throughout the program's lifetime, there are several practices that help a CSA program to maximize efficiency and reliability in data collection.

- Program administrators should use unique identifiers for participants in each dataset to more easily link information among datasets. This can help overcome accuracy challenges that arise when CSA programs collect participant data from multiple sources.

- In large programs, CSA programs may want to contract with a data management firm to outsource data collection and analysis. As the size of a program increases, so does the role of supporting technology for data collection and analysis.

- Some third-party data that CSA programs need to collect may be confidential. Programs should proactively build relationships with participants and stakeholders to facilitate data collection and should plan to negotiate with third parties to determine ethical and secure ways to access necessary data.

What are THA's current data needs and data management practices?

Data collection and management is a core activity for a CSA program. These activities include, but are not limited to:

- Tracking which students and families are enrolled in the CSA

- Monitoring academic outcomes for individual CSA students to determine eligibility for incentive payments
- Monitoring other participant outcomes associated with incentive payments
- Tracking incentive payments made to CSA family accounts
- Monitoring savings account activity
- Monitoring program finances
- Surveying participating and non-participating families
- Collecting data about, analyzing, and reporting on program impacts associated with the CSA's Expected Outcomes

THA has several expected program outcomes that are not currently measured such as getting unbanked families banked, behavioral change towards savings, and family positive perceptions toward financial institutions. Measuring these would require additional effort as described in Exhibit 4.

The Tacoma Housing Authority uses Salesforce as its primary client management and reporting database platform. Salesforce is a flexible data management and reporting environment that can offer many of the key components described as best practices in Exhibit 4. THA uses Salesforce for much of its work as a housing authority, including tracking information about individual clients including personal information, housing ledgers and payments, case management notes, CSA participant data, dashboards, and reporting. Staff are experienced with the program and are continually working to integrate additional aspects of the CSA program into the platform to improve administrative efficiency and reporting capability.

THA's greatest challenges with regards to data management arise from integrating across partner data platforms. Limited access to student data records from TPS and savings account records from Heritage Bank has resulted in manual and inefficient practices that are not scalable nor sustainable. Additionally, inconsistencies in data management practices at TPS as well as the level of aggregation in TPS reporting undermines the ability of THA staff to effectively monitor and measure academic outcomes associated with program goals and incentives. The TPS liaison noted the school district maintains many external partnerships that support students and receive academic data. Existing data limitations to THA are likely the result of default account configuration for TPS external partners, not policy. The liaison stated a willingness to assist with providing improved access to CSA student academic data to overcome system inefficiencies.

Student academic outcomes performance measures

THA envisions the CSA supporting the mission of helping "the children it houses succeed in school." The financial benefits of the CSA alone are not enough to promote college access and success to participants of the program. Students must also be academically, socially, and emotionally prepared.

THA currently collects data to monitor if children enrolled in the CSA are succeeding academically using short and long-term performance measures (at right). THA is also interested in academic performance across comparison groups. These comparison groups include non-CSA participants, other THA served children, students receiving free and reduced meals, and children experiencing homelessness or housing insecurity.

THA has considered evaluating how effective these academic measures are for indicating student success and may update them if more meaningful data is found and available.

Reporting Academic Performance to External Partners

The Tacoma Housing Authority has entered into formal agreements with external partners that support the CSA. Current partners include Tacoma Public Schools and the College Spark foundation. Each partner has their own interests in academic achievement influencing what data is available to THA and what data THA is asked to provide.

Tacoma Public Schools

The Tacoma Public School District 2015-2020 Strategic Plan sets academic excellence goals for all students, with the goal of at or above grade level achievement and the elimination of disparities among all groups.

The District's academic benchmarks include, but are not limited to, the following:

- The percentage of high school students graduated on time, dropped out or are continuing.

- The percentage of high school students taking at least one rigorous course.

- The percentage of students scoring at each level of the English/Language Arts (ELA) assessment.

- The percentage of students scoring at each level of the math assessment.

- The percentage of students earning a 'C' or better in Algebra or Geometry, and ELA.

ACADEMIC OUTCOMES

Short-term academic measures

- School attendance

- School discipline

- Number and percent of middle school student plans that are signed

- Number and percent of milestones met in the middle school plans

Long-term academic measures

- School reading/math test results

- (5th & 10th grades)

- School grade point average

- School attendance

- School disciplines

- Rate of student meeting milestones during the middle school and high school stage

- Rates of high school graduation

- Rates of enrollment in Qualified Post-Secondary Education or Training Program

- Rates of graduation from Qualified Post-Secondary Education or Training Program

- The percentage of students failing one or more courses.

- The percentage of students participating in extracurricular activities.

- The percentage of high school seniors accepted to college or other post-secondary education.

- The percentage of students who have earned industry certifications.

College Spark

The College Spark foundation provided 2018 Outcomes Acceleration grant funding to the THA. College Spark has requested THA prepare a memo on academic outcomes that is responsive to the foundation's academic performance indicators. To the extent possible, these data are summarized in Appendix A of this report.

College Spark's academic outcome indicators include, but are not limited to, the following:

- The percentage of low-income high school students who trigger Early Warning Indicators – attendance under 90%, course failure, and/or suspension/expulsion.

- The percentage of low-income high school students who complete Algebra II with a grade of C or higher.

- The rate of high school graduates who directly enroll in postsecondary education.

Current academic data management practices

The Tacoma Housing Authority and Tacoma Public Schools have agreed to a memorandum of understanding (MoU) to exchange and release student information within standards set by the federal **Family Education Rights and Privacy Act (FERPA)**. Guardians of CSA participants have also signed waivers to allow for the release of student academic data to THA and third-party evaluators.

Under the agreement in practice, TPS produces an aggregated **academic scorecard** for CSA participants at the end of each academic semester (in January and June). The scorecard summarizes performance measures for CSA participants that include but are not limited to state assessment results, discipline, extracurricular activities. These scorecards provide a useful snapshot of academic performance by school level (elementary, middle and high school) but does not include individual academic records that could be used for more detailed analysis.

In addition to the scorecard, THA staff members have received FERPA exemption to receive access to individual student data through a **student information database**, eSchoolPlus, used by Tacoma Public Schools. The THA database account has restricted account settings, with only 'read-only' access to CSA participating students. An exception to the account read-only permissions is the ability to add and remove students from the CSA participant grouping.

Limitations in TPS academic outcomes data

Data on student academic outcomes and activities are tracked by TPS staff in a system called eSchoolPlus. Interviews revealed that there are often inconsistencies in how different TPS staff members use the platform, including differences between schools and teachers. These inconsistencies are particularly notable with regards to topics like extracurricular activities.

There is also evidence of ad hoc usage of existing fields in eSchoolPlus to track new data. For instance, to tag students who participate in the CSA, TPS notes this in an "activity code", which are typically used for tracking participation in sports or other extracurriculars. These codes are not linked to start and end dates, so TPS regularly deletes all activities as a way to keep the information up to date. This recently resulted in the loss of data about CSA students in eSchoolPlus.

THA should consider these issues and limitations as it develops its strategy for improving data management.

The TPS student information database, eSchoolPlus, features multiple account types: administrator, teacher, and family. THA uses an administrator account that can view aggregated student information and individual student records of CSA participating children. THA uses eSchoolPlus to access courses taken, grades, attendance, assessment scores, extracurricular activities, and discipline (suspensions and expulsions). Additional database features are available from eSchoolPlus but are not currently used by THA. These include writing and saving data reports, notification messages when set conditions are met, configuring dashboards, and more. According to the TPS liaison, TPS is open to expanding the level of access to CSA student data by THA staff to enable more efficient data collection and analysis.

Data needs for outcomes measurement and evaluation

Here we summarize current data collection and management related to each of the Expected Outcomes THA has defined for the CSA program. We also provide some preliminary recommendations for enhancing these practices in the future, if THA continues to want this data. However, THA should consider revisiting the list of outcomes once it answers broader questions about the CSA model and integration, and its areas of focus.

Exhibit 5. Data Needs for Student Outcomes Performance Measurement

GOAL	CURRENT DATA COLLECTION PRACTICE	PRELIMINARY RECOMMENDATIONS
Short-term Measures		
Students participate in a financial literacy program at least once every school year (all)	THA needs data about the date of each financial literacy program attended by individual CSA student. This information is currently collected manually by THA staff and input into Salesforce for analysis.	The current collection protocol would be difficult to scale. Address how financial literacy fits into the broader program design before exploring new approaches to data collection.
Students' account balances are growing.	THA does not currently report on this outcome. However, it does collect data necessary to report on this outcome. THA receives monthly account statements from Heritage Bank which include deposit activity. THA staff manually input this information into Salesforce for tracking.	A more efficient process for pulling data from the bank into Salesforce is essential for monitoring this performance measure in a sustainable and scalable manner.
Long-term Measures		
Students make successful transitions to high school	THA has not defined a way to measure this outcome. THA has access to individual student records through eSchoolPlus, and it would be possible to develop metrics using this data.	Explore metrics that would provide meaningful information about high school transition. OSPI provides some ideas on monitoring Freshman success.
Students graduate from high school or equivalent	To date, no CSA participants have been eligible to graduate. So, no data has been collected by THA. TPS uses the following metrics to track graduation rates: ▪ % of students graduating on time ▪ % of students graduating –extended time ▪ % of students dropping out ▪ % of students re-enrolled from drop out	We recommend THA reach out to TPS to ensure consistency with measurement of these outcomes, and to confirm whether special cases such as dropping out and later earning a GED are effectively tracked.
Students enroll in a postsecondary program within one year of graduating from high school or equivalent	To date, no CSA participants have been eligible to graduate or ready to enroll in postsecondary. So, no data has been collected by THA. TPS measures "Students with Acceptance to Next Institution".	THA should reach out to TPS to ensure they measure this outcome in a consistent manner. It may be that THA has access to more reliable information about postsecondary activity than TPS based on withdrawal of CSA funds to pay for postsecondary education.

GOAL	CURRENT DATA COLLECTION PRACTICE	PRELIMINARY RECOMMENDATIONS
Students earn a postsecondary degree or credential	To date, no CSA participants have been eligible to graduate or ready to enroll in postsecondary. So, no data has been collected by THA.	Reach out to TPS to determine if they district collects this information about TPS graduates. Otherwise THA may need to collect this information via surveys of program participants.
Students are employed or continuing their education within one year of earning a postsecondary degree	Not yet relevant to CSA participant population.	This information will likely only be available via regular surveys of past program participants.
Students are achieving economic self-sufficiency	Not yet relevant to CSA participant population.	This information will likely only be available via regular surveys of past program participants.

Exhibit 6. Data Needs for Family Outcomes Performance Measurement

GOAL	CURRENT DATA COLLECTION PRACTICE	PRELIMINARY RECOMMENDATIONS
Short- and Long-term Measures		
Families are making deposits into students' accounts with some regularity	THA receives account statements from Heritage Bank. This data is then manually input into Salesforce by THA staff for tracking and reporting.	A more efficient process for pulling data from the bank into Salesforce is essential for monitoring this performance measure in a sustainable and scalable manner. Consider limitations in the ease of making deposits when interpreting this measure.
Families are taking advantage of opportunities to participate in a financial literacy program	This information is currently collected manually by THA staff and input into Salesforce for analysis.	The current collection protocol would be difficult to scale. Address how financial literacy fits into the broader program design before exploring new approaches to data collection.
Unbanked, but bankable families get banked	Not measured. Intake forms do not ask if families are banked or what institution they use.	THA case managers could gather this information for new enrollees and survey existing participants whose banking status is not known.

GOAL	CURRENT DATA COLLECTION PRACTICE	PRELIMINARY RECOMMENDATIONS
Eligible THA households engage with THA Community Services for the first time or at a higher level	Additional information is needed from THA to determine current practices.	THA could use connections to make referrals to community services. Individual student indicators could trigger eSchoolPlus notifications to identify students in need and alert case managers of families/students with potential needs. THA should consider how it integrates programs from a service delivery perspective and data management perspective.
Eligible heads of household enroll in the Family Self-Sufficiency Program	THA currently tracks in Salesforce enrollment in both CSA and FSS. But it does not report on this outcome.	It is currently possible to run reports in Salesforce identifying heads of household associated with both programs for reporting.

Preliminary Recommendations

OVERALL CSA PROGRAM REDESIGN

We recommend some underlying principles to the redesign of the CSA, regardless of whether the program is integrated with another.

- Use the simplest known-to-be effective design (seed, outreach, community events and reminders). More complex features should be added and tested on top of this.

  - Simplify and expand eligibility requirements. Eligibility requirements need to be (1) easily understood by families and partners and (2) defined by easily accessible data for the program administrator to confirm eligibility. An example could be "All families with at least one child under 12 on a THA program"

  - In the absence of strong evidence preferring a match and incentive model, a scholarship would be administratively simpler. Families confirmed it would be equally attractive and partners and families felt it would be more equitable. The same children (those with learning disabilities, high family obligations) who struggle in school will struggle with the incentive scheme and lose out on money and opportunity.

  - Loosen or remove financial literacy component. The current model for delivering financial literacy is administratively and logistically challenging for THA and school building partners without demonstrating impact or clear ties to CSA outcomes. We also heard feedback that the current curriculum is not age- or culturally- appropriate for the middle school population.

    - There are many other organizations and individuals who provide financial literacy, some more closely aligned with the target population. Available providers can vary by school building as does needs. Amanda-Scott Thomas offered support in identifying these.

    - Rather than insist on a given financial literacy curriculum or model, we recommend THA take a "supporting role" with buildings. This could mean introducing the CSA in any existing financial literacy programming or offering a "menu" of known financial literacy providers and the opportunity to co-design an approach that works with their teaching plans.

- Recognize a CSA as one piece of a families' overall financial strategy, not as a "silver bullet" in itself. Parents recognize the importance of college savings but are also juggling current needs, the costs of their own education, and more immediate savings goals. Financial skill-building, coaching, and planning support that places colleges savings in context of these other goals is needed.

- Seek deeper partnership with a financial institution partner. Prosperity Now/CFED's Regional Approach to Children's Savings Accounts notes that the "primary consideration is [sic] choosing a partner financial institution is that it already has, or is willing to develop, an account product that is user-friendly for low-income families and can be easily managed at scale." The current Heritage Bank product does not meet these criteria. The report lists several essential account features not met by the current product used for the THA CSA accounts, such as no or very low fees, low minimum balance and low minimum deposit features, quarterly or monthly provision of periodic account

activity reports, and the ability to open large numbers of accounts at a time. Further,

- A few families mentioned preference for a credit union (non-profit) and local staff.

- THA staff mentioned people of color staffing the branch might encourage deposit activity.

- THA's relationship with Heritage Bank extends beyond the CSA program. At the regional level they expressed some interest in deeper partnership around community engagement, however the branch representative suggested more resources would be required to do so. The possibility of more scalable data management and low-income friendly accounts may require more investment.

- Give families and children more power and control over their own progress. The Family Self-Sufficiency program, for example, asks families to bring their own proof of meeting milestones. While the CSA was designed to remove that barrier through data sharing on academic milestones without family involvement, it does make THA lose a potential touchpoint with families and makes it easier for families to disengage.

- Create opportunities for families to support each other. This includes learning and sharing across families (family to family) and within families (parents and children). Interviewees encouraged any learning program components such as financial skill-building to be designed to be fun and multi-generational. For low-income parents, quality time with their children is just as precious and scarce as money.

- Consider the right role and approach for TPS given their many community partnerships and limited capacity (especially after budget cuts).

- Connection through the Tacoma College Support Network (TCSN). The TCSN is a network of community stakeholders organized by the Foundation for Tacoma Students committed to increasing enrollment in a "right-fit" college, technical school, or post-secondary opportunity and boosting completion rates for TPS graduates, especially students of color and those impacted by poverty.

- Director of Community Partnerships at TPS (also co-chair of TCSN) would like to be more involved in coordinating partnerships

- Work with other community efforts for a more holistic approach to financial education and college planning. THA can bring a lot to the table in a supporting role simply by facilitating access to families at the right time in their children's career.

- Continue to invest in technology to significantly improve administrative efficiency and data management.

  - Automating or streamlining workflows, such as incentive tracking or providing families with account statement, will free up significant amounts of time for THA staff to focus on other aspects of program operations. THA has developed their data management system around Salesforce and can continue to do so. Staff are knowledgeable and experienced within their own system, but inefficiencies are primarily caused due to a lack of integration with external partners and the inability for systems to easily exchange information.

  - The goals should be to:

- Integrate as many aspects of the program as possible into a single, secure, database platform.

- Automate data import from external partner data systems such as the financial institution or eSchoolPlus, using data transfer protocols like APIs.

- Provide a dashboard display of standard reporting charts that update automatically with newest available data.

- Collect and store data needed for future program evaluation.

- Provide CSA participants with online access to manage account and see transaction history.

- Include contols to appropariate protect CSA participant privacy.

- Consider integrating college savings in a typical participant's interactions with THA, school, or their other financial institutions.

   - THA portion of the match comes in the form of a "rent discount" so the participant pays the same amount but accrues savings.

   - THA online payment system has a pop-up or prompt to add a dollar amount to their savings account in the same transaction.

   - Automatic transfer and/or direct deposit options.

INTEGRATION RECOMMENDATIONS

Given the findings on potential integration, the following steps are recommended should THA choose to explore either or both paths further. The paths are not mutually exclusive, i.e., THA could both integrate with FSS and offer the GET as an account option. Offering GET also does not conflict with the current arrangement with Heritage Bank, i.e., THA could potentially offer both options to interested families. The main concern would be staff capacity to manage these intricacies without significant improvement in the technology.

FSS path

FSS integration could mean automatic enrollment for FSS families with school-age children into the CSA program, but not vice-versa. FSS should be viewed as an on-ramp to CSA participation as 5-year limit in most cases would end before students pursue postsecondary plans.

The CSA program would need to remain open to families who are not eligible or interested in the FSS program and need to continue engaging with families who have exited the FSS program. THA may want to consider aligning or expanding FSS financial coach access to these families. THA may need to re-balance education specialist and caseworker resources given this new arrangement.

To explore some of the administrative details, we recommend engaging the Program Coordinating Committee and THA's FSS staff more broadly. THA should also interview POAH to understand how their FSS/CSA integrated program works.

WSAC GET path

For further information gathering, THA should connect with other CSA programs using their state 529 as

the account holder as well as master account holders who currently work with WSAC.

THA residents are unfamiliar with both WSAC and the GET program. Working with the WSAC GET program would require heavy investment in outreach to ensure the product would work for residents. This also involves investment in software development. If interested in moving forward, the two organizations should plan a kick-off meeting to discuss cost sharing, data sharing, commitments to outreach, and more details about necessary infrastructure investments.

THA would need to discuss internally whether to offer one or either of the savings options to families (GET and Heritage Bank) and a grandfathering or transition plan for current CSA families.

CSA OUTCOMES EVALUATION AND REPORTING

- Focus the list of intended outcomes, or at least clearly delineate which are priority indicators and will be measured. Priorities may be shaped by which outcomes a CSA has the most influence over and which outcomes are shown to most impact low-income students' college access and success.

- Collect academic outcomes data in a format that enables flexibility for future evaluation studies

  - If THA wishes to conduct a robust and meaningful evaluation of academic outcomes, it needs to collect data in a format that will allow for more sophisticated data analysis. This includes developing a longitudinal (time-series) data model for storing academic outcomes data by individual student in a database environment that includes other student characteristics such as race, income, housing and family situation, disability, when they joined the CSA, etc. Having the data in this format will allow researchers to analyze how outcomes differ for different kinds of students and explore why those differences may occur.

  - Investments in technology can enable the automated import of individual student data from eSchoolPlus to develop and grow this valuable dataset.

  - Having data at the individual level will enable assessment of Early Warning Indicators such as those promoted by College Spark.

  - Automating collection of THA student data through eSchoolPlus reduces THA's reliance on TPS for accurate reporting.

- Consider new performance measures that focus on student growth over grade performance

  - iReady is designed to measure individual progress, students are assessed three times annually. Track iReady scores for three scores per year, measure how many students show growth over academic year.

  - Aggregate metrics can focus on average growth by individual students, such as how many students achieved expected reading comprehension growth in a school year.

  - Disciplinary outcomes measures, such as suspensions or expulsions, can present significant challenges for interpretation. They can be affected by school or district policies which may change over time, and national data shows inequitable patterns of student discipline based on race, class, and gender. The impact of teacher biases should also be considered.

Appendix A: Analytic brief on middle school academic trends related to attendance, reading & math outcomes and discipline (College Spark)

College Spark, as a funder of the Tacoma Housing Authority's Children's Saving Account (CSA) Program, has requested academic outcome measures for middle school students taking part in the program. There were 52 total CSA participants enrolled in middle school during the 2018-19 school year, and 29 8th grade students who completed the Smarter Balanced Assessment. A summary of data requested for 2019 with discussion notes about current availability and subject considerations is shown in Exhibit 7.

Exhibit 7. Academic Outcome Data Requested by College Spark for 2019

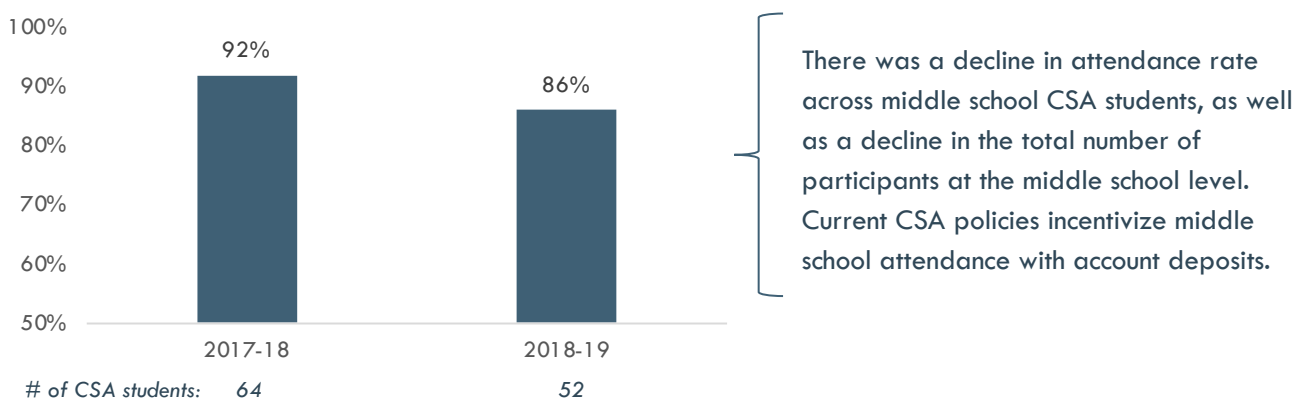| DATA REQUESTED	INCLUDED?	DISCUSSION
Attendance	Yes	▪ Attendance data is currently available at a summarized level for all CSA students. Access to individual attendance data would enable alternative metrics, such as number of students who trigger an Early Warning Indicator.
Grades	No	▪ This data is currently not accessible, it is expected to be reported later. Grades may not be fully indicative of student success, and does not account for factors of instruction quality, course selection, or life events. Student growth over an academic year may also be considered – this is discussed more in the SBA scores row below.
Disciplinary actions	Yes	▪ This data is currently available for 2017-2019 school year only at a summarized level for all CSA students. Access to individual disciplinary data would enable alternative metrics, such as number of students who trigger an Early Warning Indicator. ▪ Inequities in discipline actions have been found based on race, disability status, and gender.
SBA ELA scores 3 and above for Grade 8 *and:* SBA Math scores 3 and above for Grade 8	Yes	▪ Comparison between years is difficult because the population of students tested will change each year. ▪ To complement the reported state assessment scores, iReady Diagnostic measures are recommended for future reports. iReady is an adaptive assessment taken three times per school year. It benchmarks student performance to then measure the amount of growth a student shows in a year.

ACADEMIC OUTCOME INDICATORS

Note: Race, gender, and disability breakdowns categories on the academic scorecard produced by TPS are largely not available due to data suppression.

Attendance rates

Middle school attendance rates for CSA participants are shown in Exhibit 8. Under the current data sharing agreement with Tacoma Public Schools, only aggregate annual school level reporting is available. BERK is exploring options to obtain individual level data to enable alternative metrics, such as number of students who have five or more absences during a single school semester. A reporting tool is being considered to simplify reporting attendance data over time.

Exhibit 8. Middle School Attendance Rates for CSA Participants

There was a decline in attendance rate across middle school CSA students, as well as a decline in the total number of participants at the middle school level. Current CSA policies incentivize middle school attendance with account deposits.

Sources: Tacoma Public Schools, 2019; BERK Consulting, 2019.

Disciplinary actions

Middle school suspensions and expulsion rates for CSA participants are shown in Exhibit 9. Under the current data sharing agreement with Tacoma Public Schools, only aggregate annual school level reporting is available for the 2017-18 school year. BERK is exploring options to obtain individual level data to enable alternative metrics, such as number of students who trigger Early Warning Indicators.

Exhibit 9. Percentage of Middle School that were Suspended/Expelled

27% of CSA students received disciplinary action in the 2017-18 school year. Discipline rates can vary based on school and district policies, and national data shows disparities in student discipline exist based on race, disability, and gender.
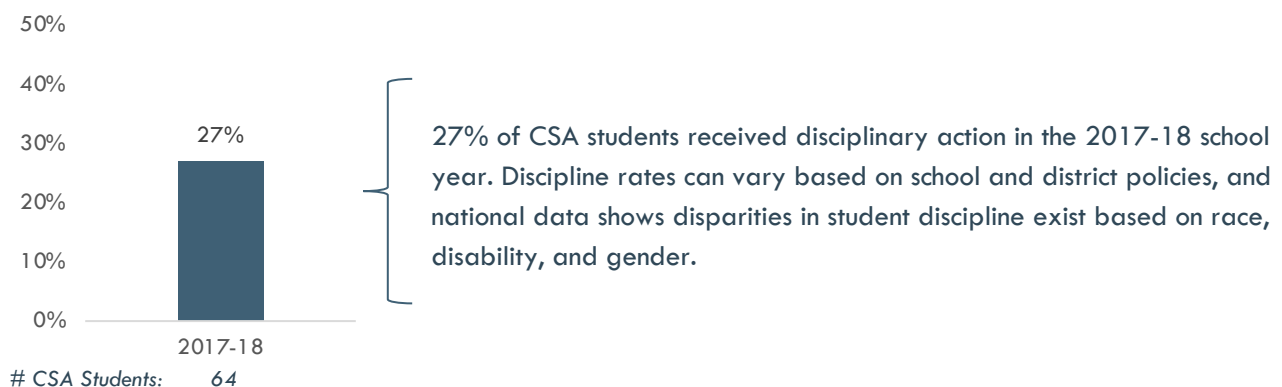
Sources: Tacoma Public Schools, 2019; BERK Consulting, 2019.

English Language Arts assessment

English Language Arts (ELA) assessment data is shown in Exhibit 10. The SBA results show 31% of CSA students are meeting or exceeding the state standards.

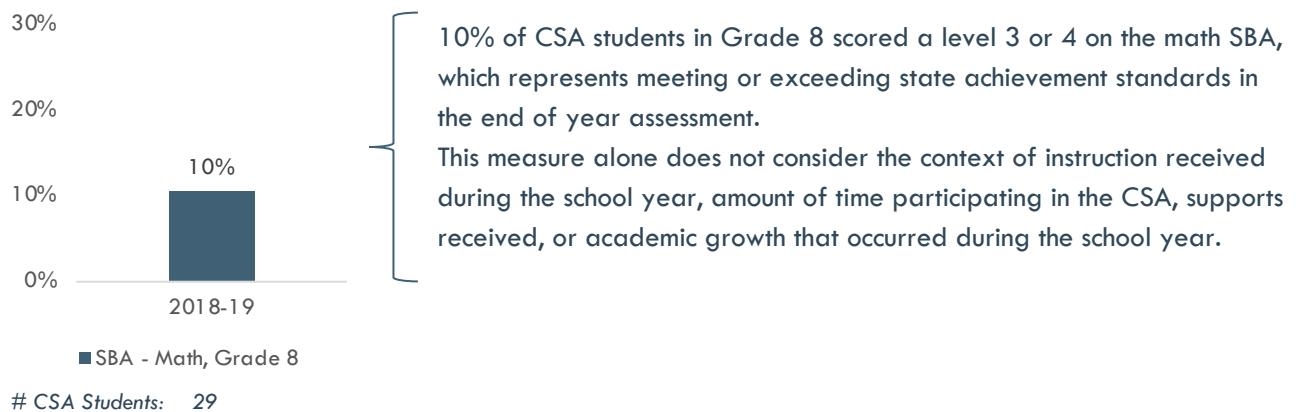**Exhibit 10. Grade 8 Smarter Balance Assessment, English Language Arts Scores of Level 3 and Above**

31% of CSA students in Grade 8 scored a level 3 or 4 on the ELA SBA, which represents meeting or exceeding state achievement standards in the end of year assessment.

This measure alone does not consider the context of instruction received during the school year, amount of time participating in the CSA, supports received, or academic growth that occurred during the school year.

SBA - ELA (Grade 8)
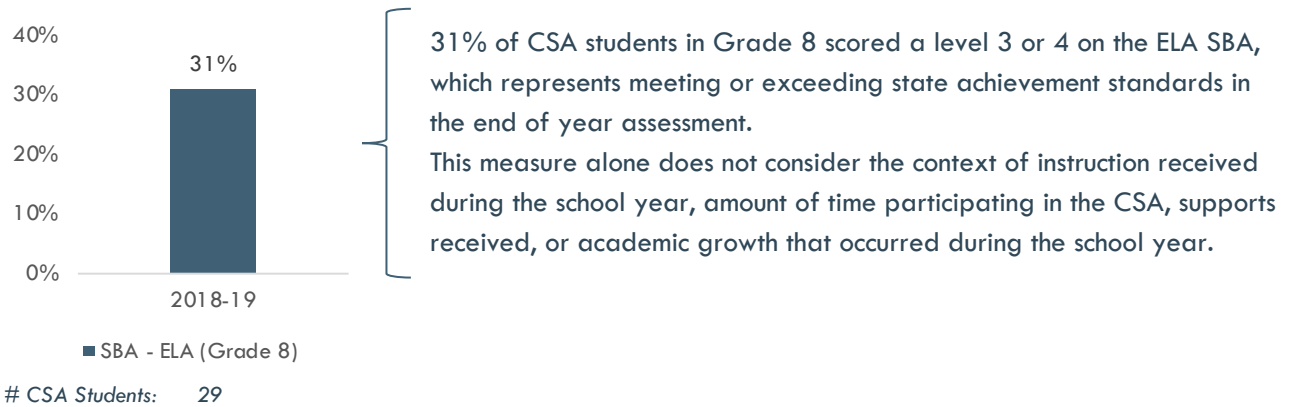
CSA Students: 29

Sources: Tacoma Public Schools, 2019; BERK Consulting, 2019.

Math assessment

Math assessment data is shown in Exhibit 11. The SBA results show 10% of CSA students are meeting or exceeding the state standards.

Exhibit 11. Grade 8 Smarter Balance Assessment, Math Scores of Level 3 and Above

10% of CSA students in Grade 8 scored a level 3 or 4 on the math SBA, which represents meeting or exceeding state achievement standards in the end of year assessment.

This measure alone does not consider the context of instruction received during the school year, amount of time participating in the CSA, supports received, or academic growth that occurred during the school year.

SBA - Math, Grade 8

CSA Students: 29

Sources: Tacoma Public Schools, 2019; BERK Consulting, 2019.

Appendix B: Full survey results disaggregated by race/CSA participation

Note: Questions were added to the survey in two rounds. At the time of this survey, questions added in the second round only had a few respondents. The total number of respondents is noted in the header for each question.

Q1: Do you currently participate in the Children's Savings Account program? (66 respondents)

By Race
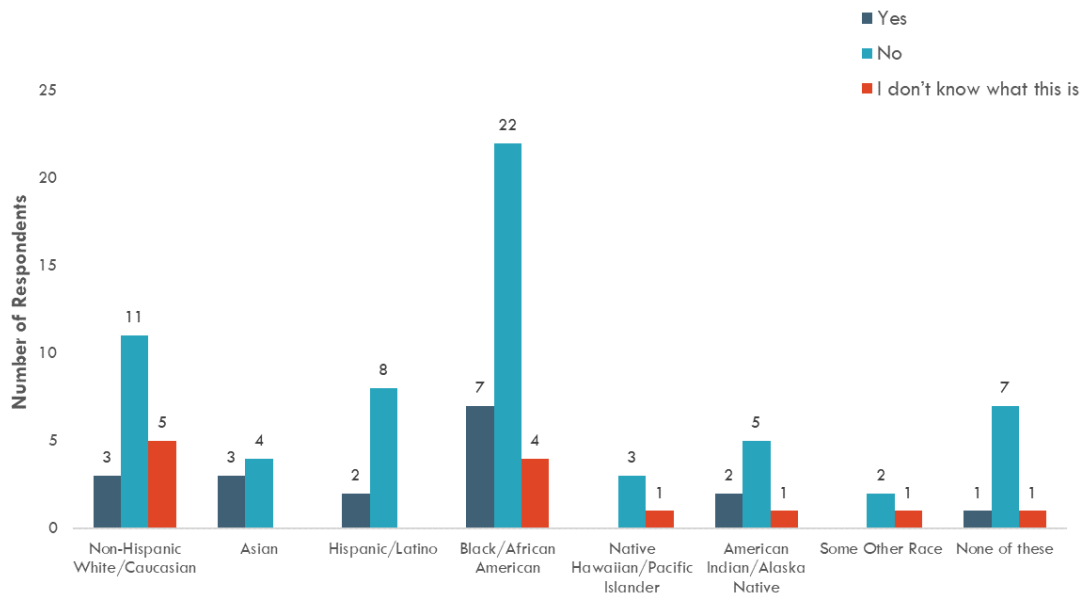
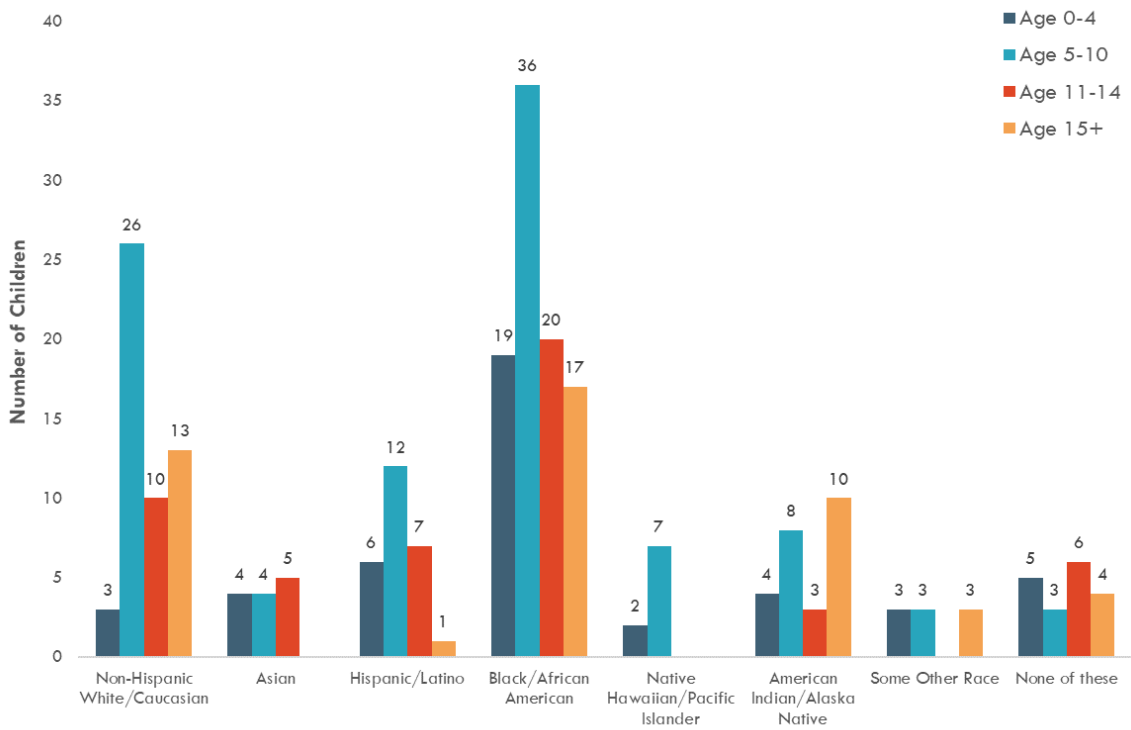*Q2: Why do you participate? (4 respondents)*
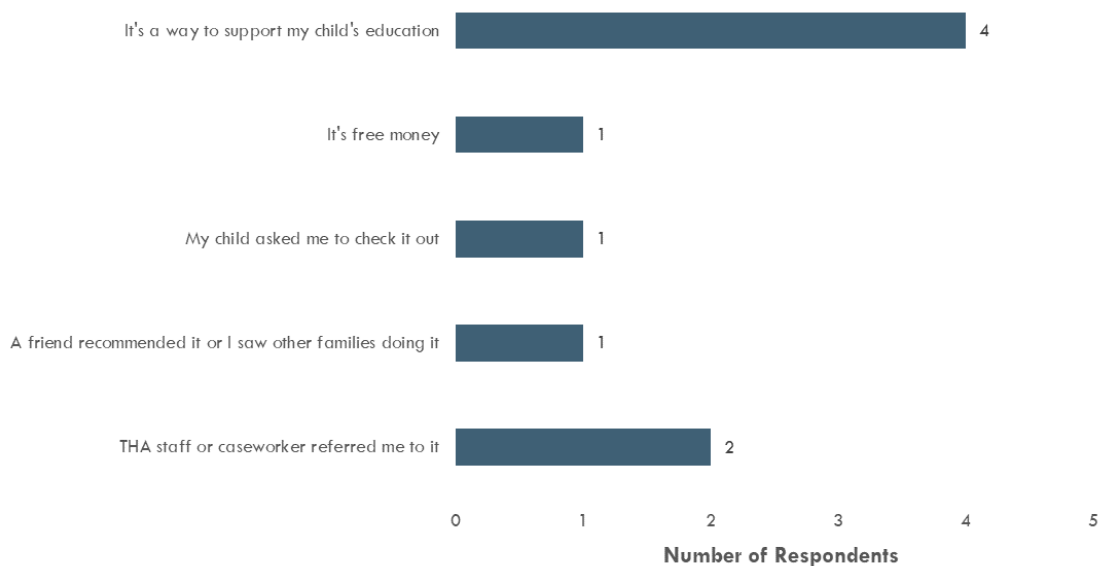
Q3: Why do you not participate? (5 respondents)
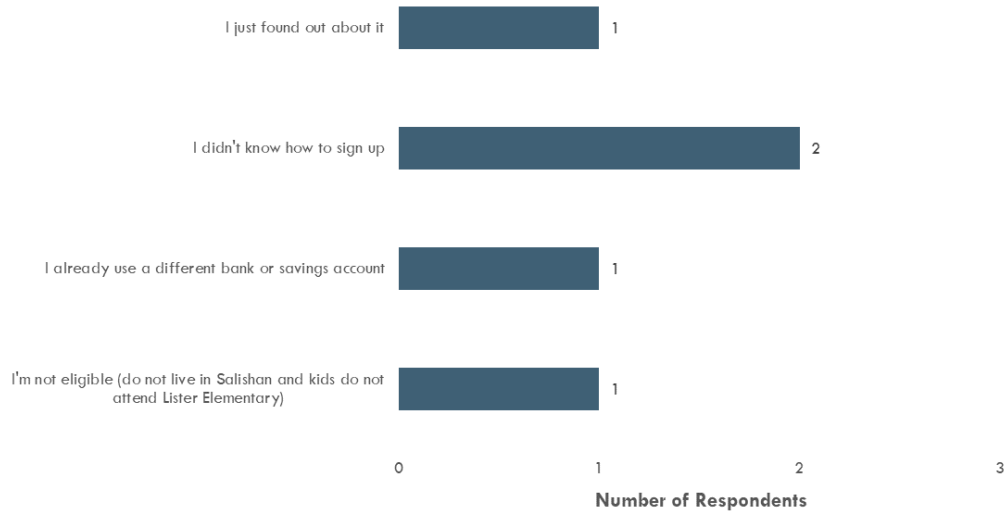
Q4: How many children do you have in the following age ranges? (66 respondents)

By CSA Participation
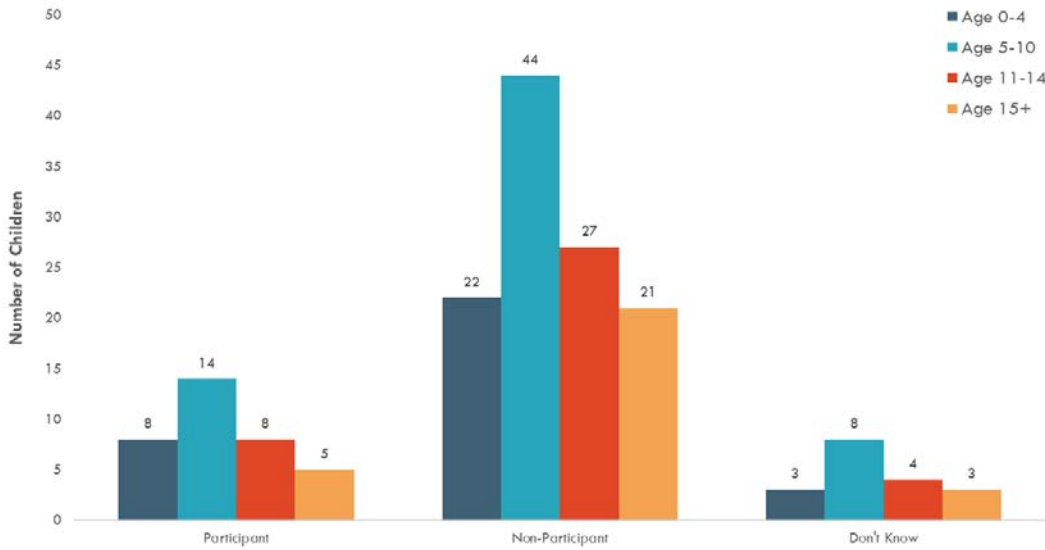
By Race

Q5: What do you expect your children to do after high school (check one)? (65 respondents)

By CSA Participation
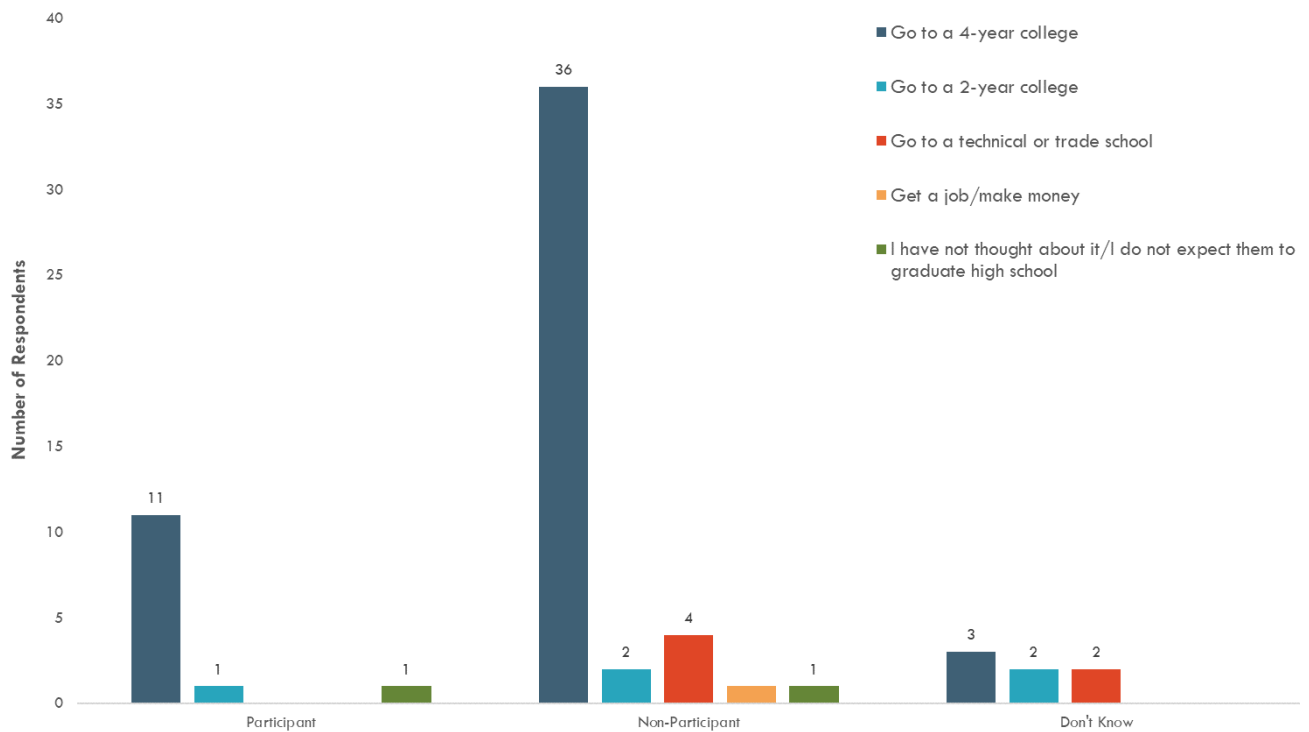
By Race
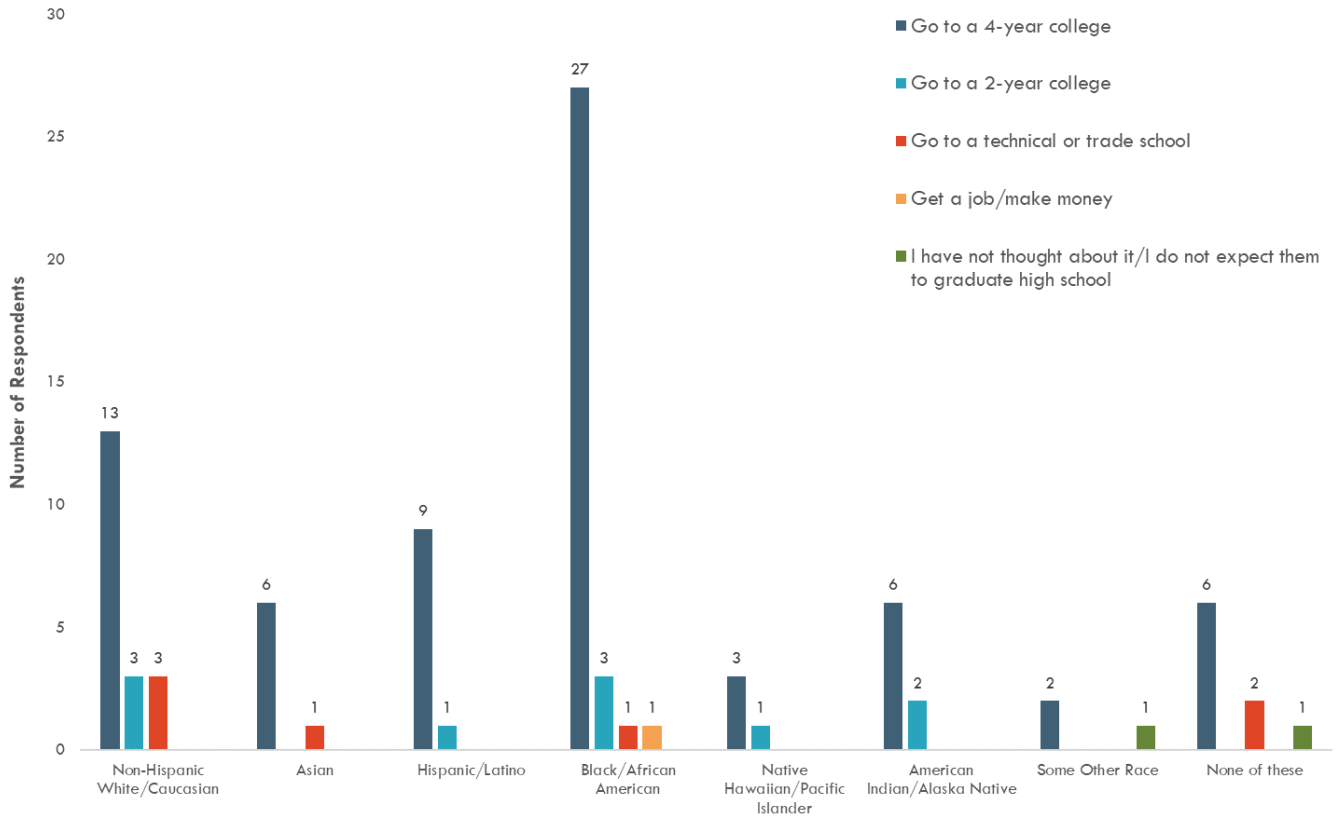
Q6: The Children's Savings Account is a way for THA to invest alongside parents in their children's educational plans. There are different ways THA can invest. Which of these do you prefer? (8 respondents)

Q7: Do you identify with any of these groups (check all that apply)? (63 respondents)

Bar chart — Number of Respondents:
- Non-Hispanic White/Caucasian: 19
- Asian: 7
- Hispanic/Latino: 10
- Black/African American: 33
- Native Hawaiian/Pacific Islander: 4
- American Indian/Alaska Native: 8
- Some Other Race: 3
- None of these: 9
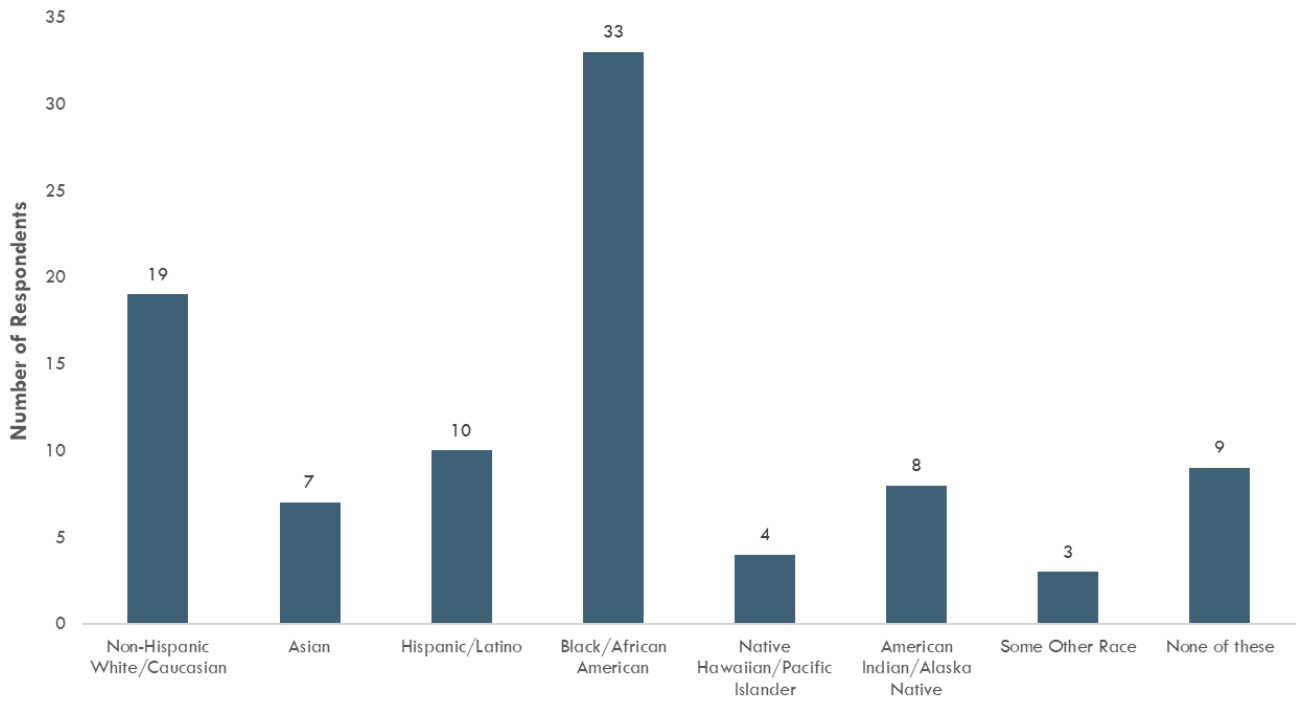
Q8: Do you have a THA case worker? (63 respondents)

By CSA Participation

Grouped bar chart — Number of Respondents (Yes / No / I don't know):
- Participant: Yes 6, No 4, I don't know 3
- Non-Participant: Yes 17, No 11, I don't know 14
- Don't Know: Yes 1, No 2, I don't know 4
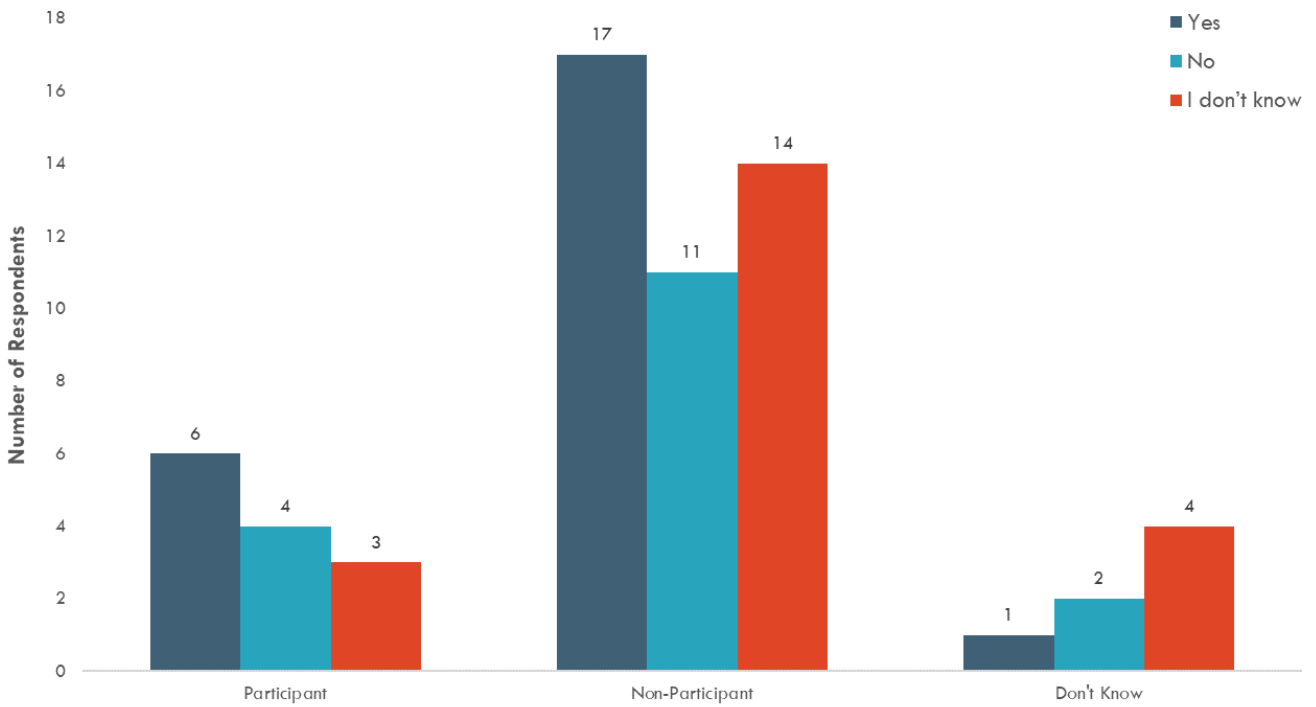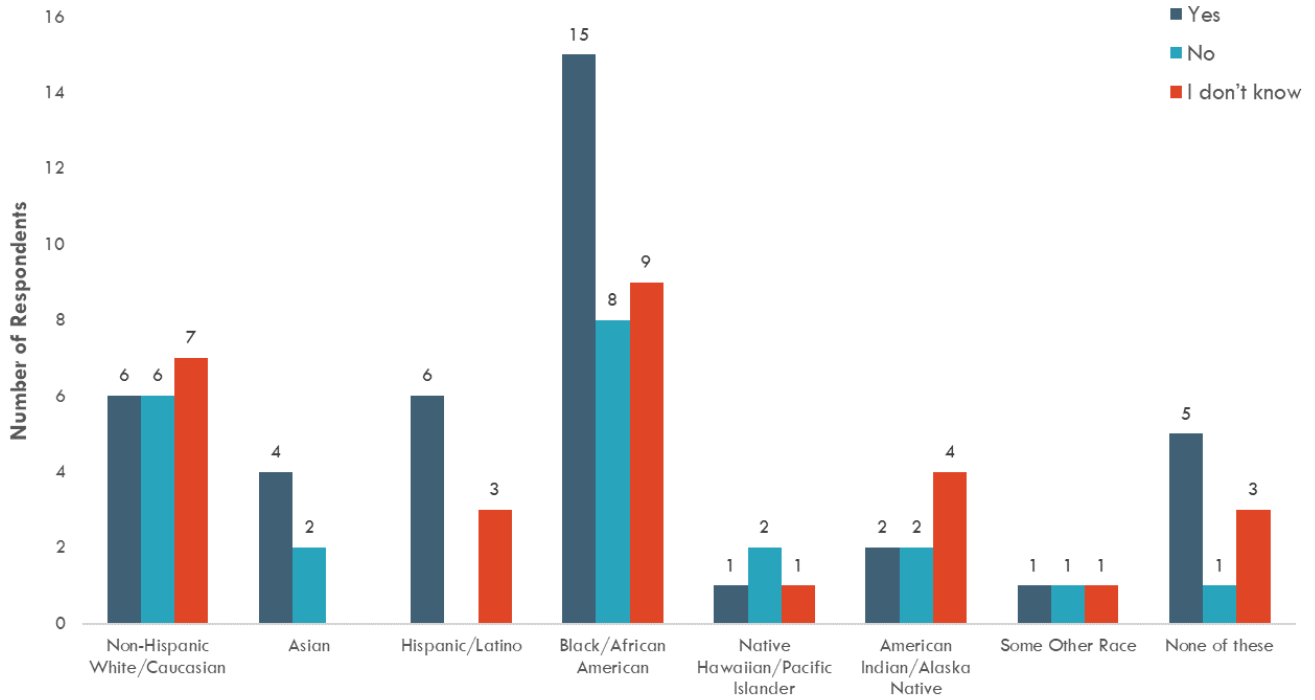
By Race

Q9: Would you be willing to be interviewed about saving for college? Participation includes a $30 Safeway gift card! (66 respondents)
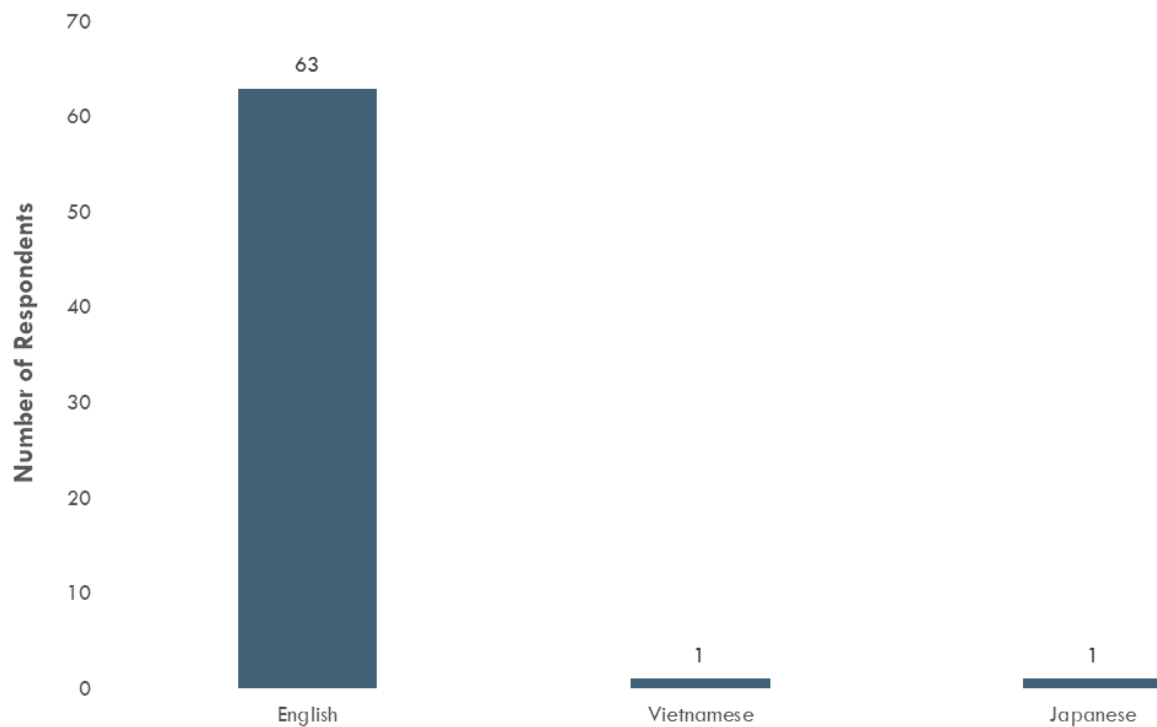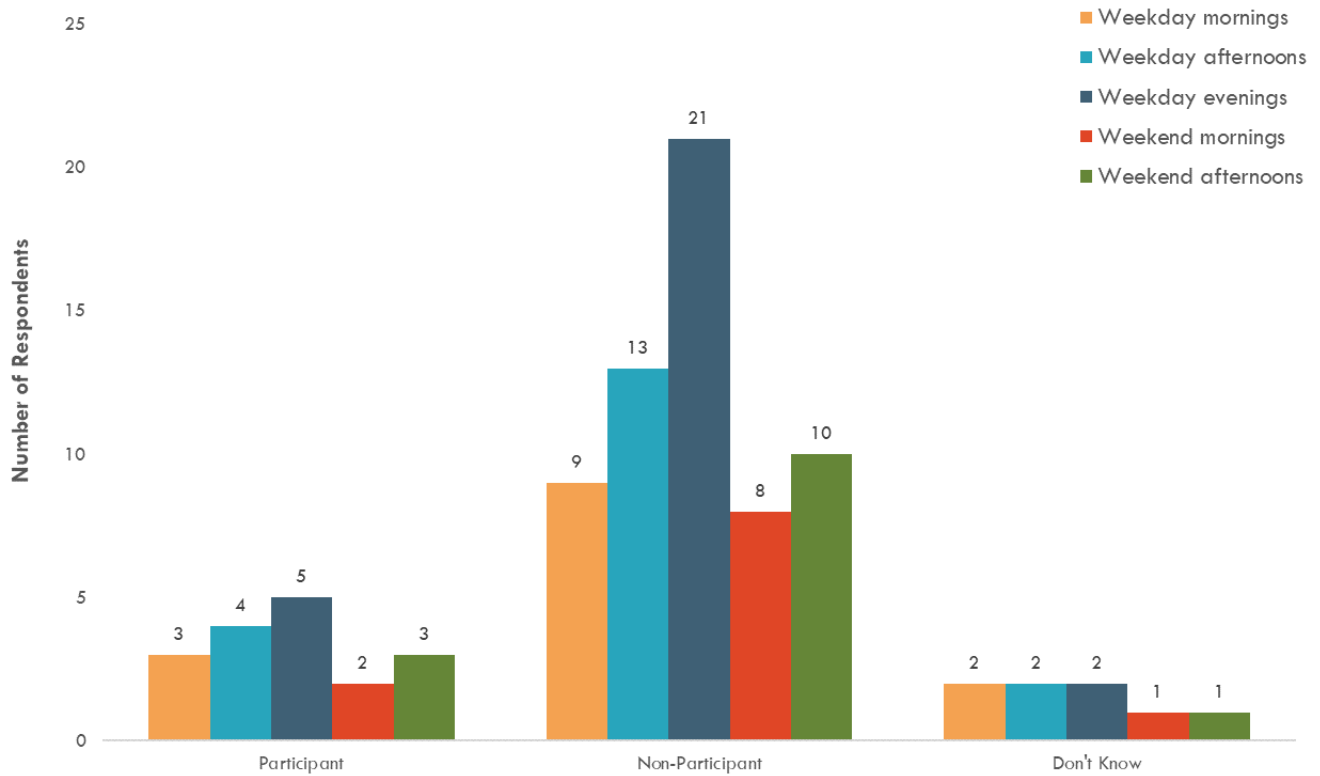
By CSA Participation
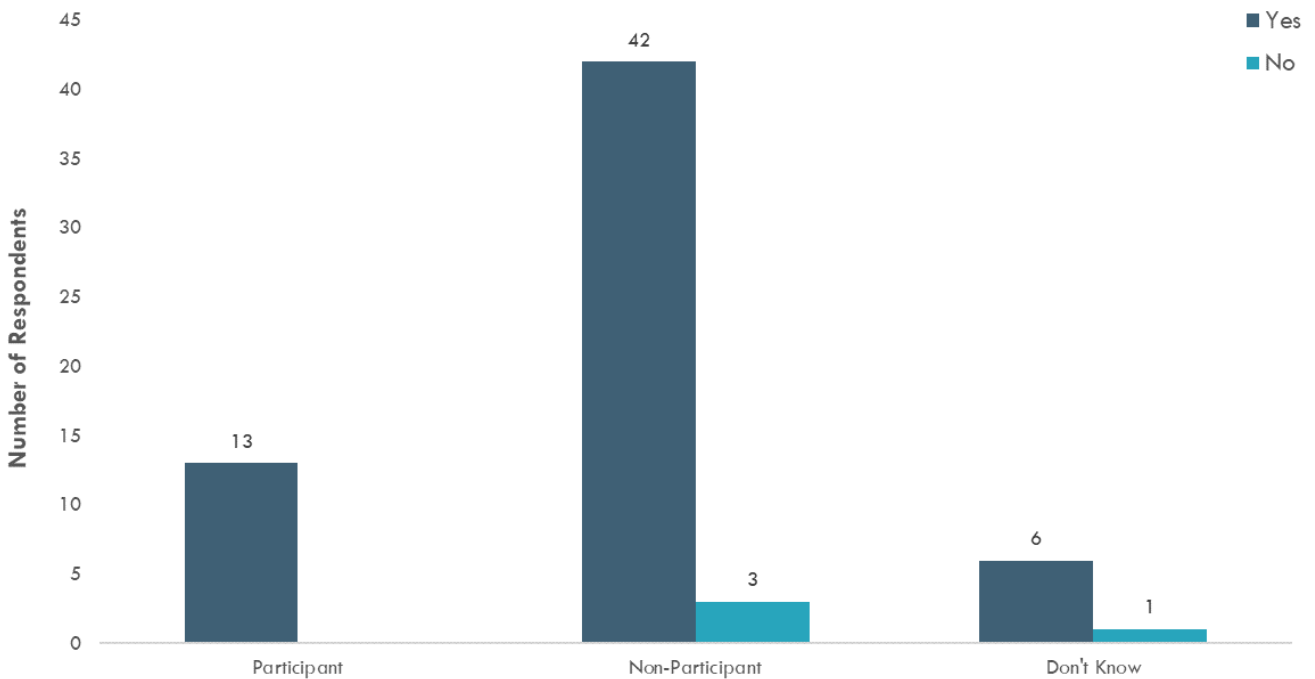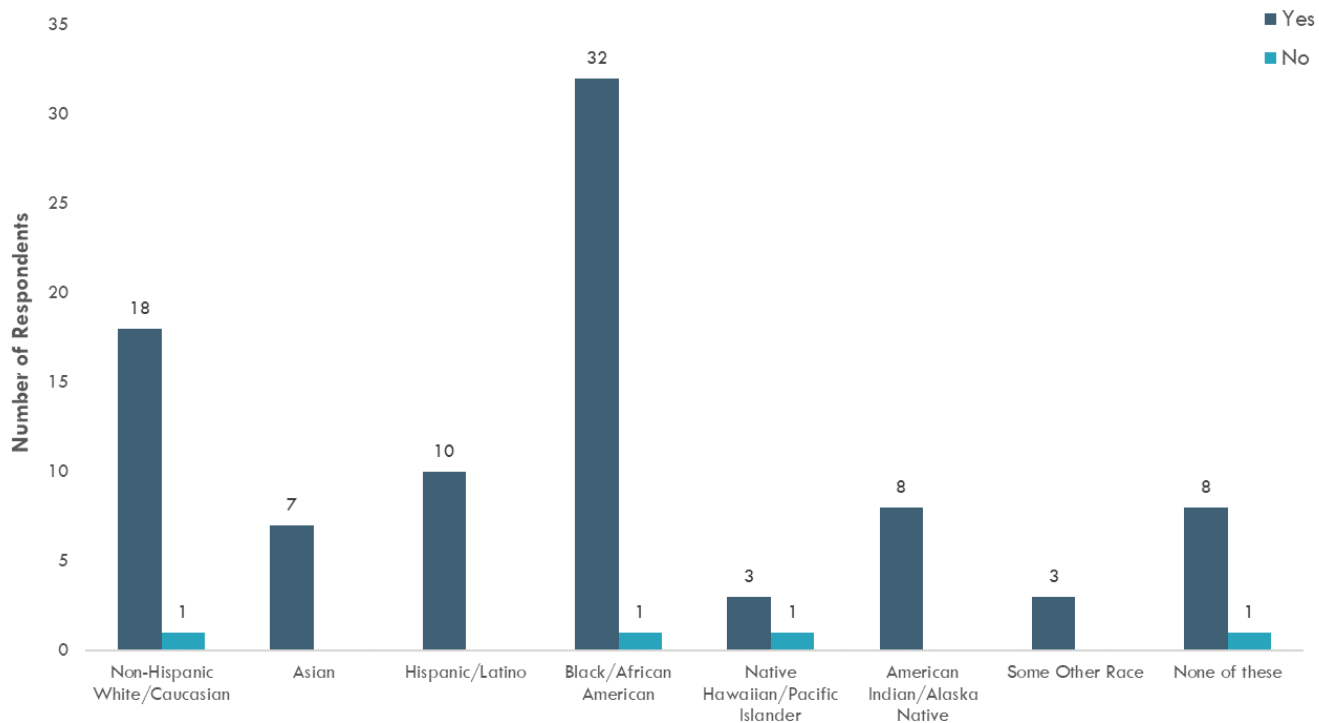
By Race

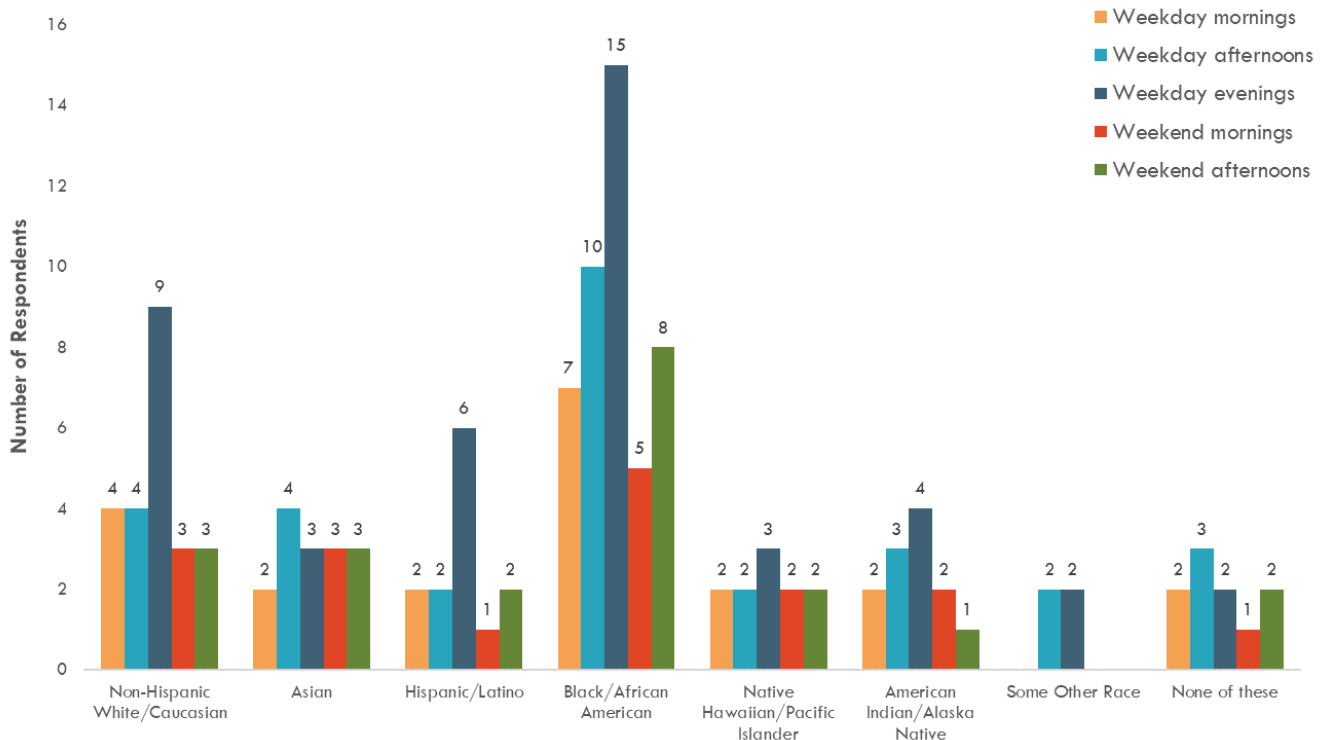*Q10: If yes, what languages are you able to participate in (check all that apply)? (65 respondents)*

Q11: What times can you be available (check all that apply)? (64 respondents)
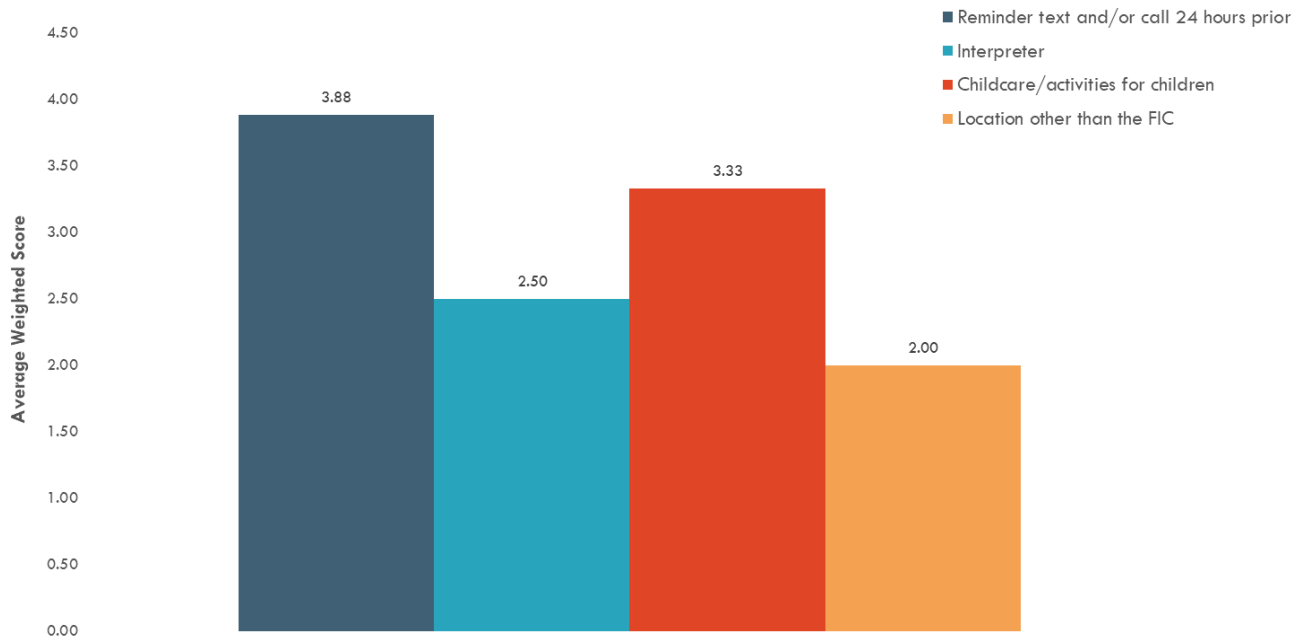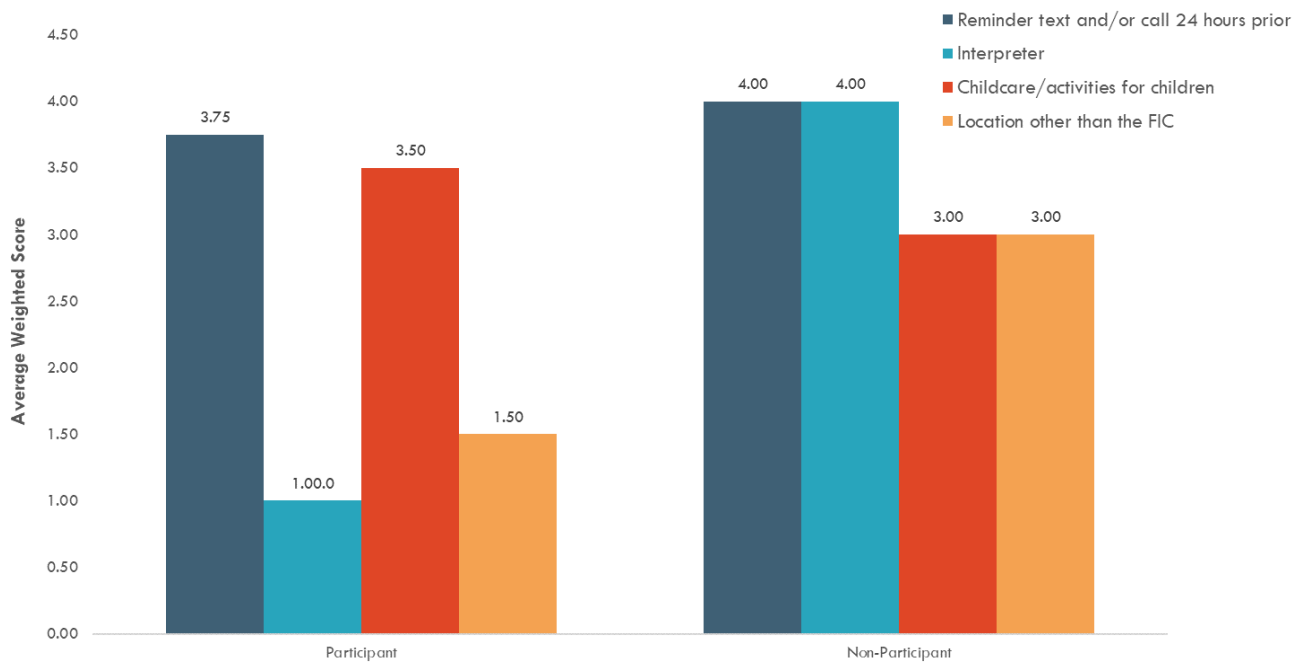
By CSA Participation

By Race

Q12: What would help you attend a focus group? (Please rank with 1-most helpful to 4-least helpful) (9 respondents)
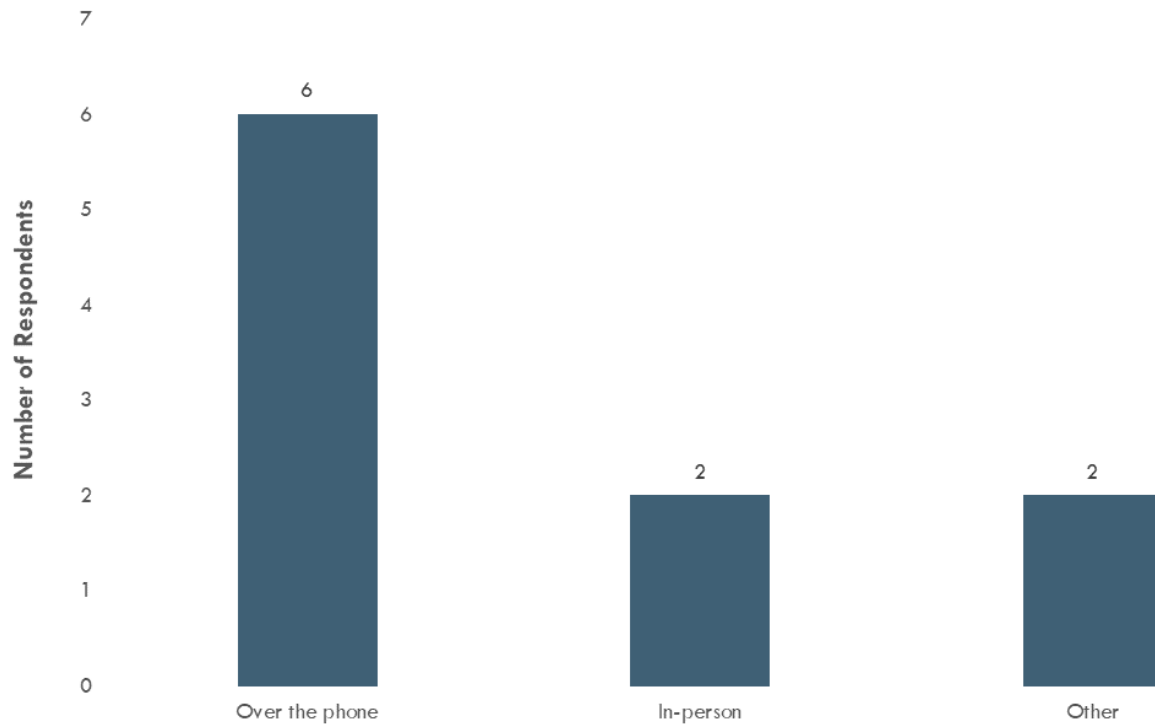
Overall

By CSA Participation

Q13: How do you prefer to be interviewed? (10 respondents)

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