

**Comments Received During 60-Day Public Comment Period  
On the Draft 2009-2010 Free Application for Federal Student Aid (FAFSA)**

<b>Comment Number</b>	<b>FAFSA Number</b>	<b>Comment</b>	<b>Source</b>	<b>Meeting Notes</b>	<b>Resolution</b>
1	11	Question 11: Driver's License Number. We suggest adding this text to the end: "(leave blank if you do not have one)."	Lauren Asher	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
2	13	Question 13: E-mail Address. We suggest modifying the last sentence as follows: "If you prefer to be contacted by postal mail, or do not have an email address, please leave this field blank."	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Accept change <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/16/08 meeting decision. Place on FOTW & Paper Requirements Tracking Summary (RTS)	
3	14	Notes for question 14 (page 2). The current language makes it unclear whether students who are neither citizens nor eligible noncitizens should complete the FAFSA. We recommend changing the last sentence of this Note to match the language used in the current FAFSA on the Web Worksheet, as follows: "However, you should still complete the application, because you may be eligible for state or college aid." Question 14: Citizenship. We suggest this modification: "Mark only one." We also recommend adding "Skip to question 16" after option (c).	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Accept changes for both the Notes and the Question. Also, do a global change to eliminate 'a, b, c' notations in front of specific responses. (Questions 14, 33, 34, 82, and 83) <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/16/08 decision. Place on FAFSA Paper RTS. Forward to Brian Schelling (FSA) to consider update to Application and Verification Guide (AVG)	
4	16	Question 16 has huge implications for many students, especially upperclass-level students in our university. Paper FAFSA -- perhaps consider adding a 'Note' on Page 2 which would state something along the lines of -- You are reporting your marital status 'as of today' -- the time you submit your first FAFSA for the 2009-10 year. Understand, this is NOT a correctable item. If you are currently single/divorced and you plan to marry at a later date during the 2009-10 year, you may want to speak to the Financial Aid Office at your school before submitting this FAFSA. Again, once you submit your first FAFSA, you will not be able to make any corrections to this item. Online FAFSA -- I have no idea what type of instructions / help pops up -- but again perhaps some type of note under question.	Steven Winey	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

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5	19	Student Status of Legal Residency. Question 19 is redundant and could be calculated based on the student's response to question 20.	Leonard Gude	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
6	19	Question 19: State Residence. We recommend defining "state of legal residence" in the Notes section.	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Need input from Policy (Office of Postsecondary Education (OPE)) <u>10/20/08 FSA/OPE Meeting</u> : No change	
7	22	The 'Register me' wording for the Selective Service question is good.	Jim Green	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
8	22	Define Selective Service - I had several students tell me they didn't know what that was so they left it blank.	Stephanie Gardiner	<u>10/16/08 FSA Meeting</u> : Do we need to define Selective Service? <u>10/20/08 FSA/OPE Meeting</u> : No change	
9	22	The gender and selective service questions were in a more compact format on the 2008-09 FAFSA. If there's a good reason for the new format (say, user studies demonstrated that it minimized confusion), modify it to fit in three lines instead of four to save space. For example, if you add carriage returns to yield:  Are you male or female?  to split #21 across three lines, that might free up enough horizontal space to make #22 fit in three lines, saving a line.	Mark Kantrowitz	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

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10	23	Question 23: Drug Conviction. This question applies only to students who have received federal financial aid in the past, and therefore it is superfluous for first-time applicants -- the population most likely to be deterred by the FAFSA's complexity and length. Since all renewals are electronic, and the Department automatically distinguishes between renewal-eligible applicants and first-time applicants online, this question should appear only on the electronic FAFSA presented to renewal-eligible applicants. For renewal-eligible applicants, we suggest replacing the current sentence that begins with "If you have,..." with the following two sentences: "Whether you answer "yes" or "no," complete and submit this application. If you answer "yes," we will send you a worksheet in the mail so you can determine if your conviction affects your eligibility for aid."	Lauren Asher	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
11	26	High school question 26 is much better than this year's question, we had a majority of students who left it blank this year.	Pearl Creviston	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
12	26	Question 26 -- We have received a number of FAFSA's where this was left 'Blank'. Online FAFSA -- Make this a 'required' field -- if they leave it blank and try to go on to the next section, force them back to this question so that they provide one of the answers. ** if this is left blank, then packaging of aid is delayed and the student gets frustrated.	Steven Winey	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
13	26	To Whom It May Concern: After review of the proposed FAFSA we have identified a few areas that we believe could be changed for clarity: FAFSA Q26: We have an entirely adult population and suggest that this question be worded differently. Our suggestion is: Do you have or will you have a High School completion status when you begin college in the 2009-2010 school year?	Deborah Flinn	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
14	26	Question 26: The revised high school completion question is welcomed! It is a great improvement over the 2008-09 question wording about this item.	Jim Green	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

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15	28	Good morning. I have three comments for the 2009-10 FAFSA: 1. Yeah! There is more clarity to some of the troublesome questions of the past. And no worksheets. Thank you. 2. Question 28. Still is troublesome for credential students. They don't know how to answer the question correctly – although 29 includes them. Either specifically include them in 28 or provide instructions on how they should answer 28.	Lili C Vidal	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change - this is a state question	
16	28	Making questions 28-31 self-contained improves clarity and is more convenient for the applicants, but does increase the length of the form. The side-by-side format for questions 33 and 34 is an improvement.	Mark Kantrowitz	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
17	29	Question 29 -- Another question that creates problems in processing student's aid. Many students who are 'Undeclared' regarding their choice of major, but who are definitely accepted into an undergraduate degree program (answers should legitimately be 0, 1, 2) are unfortunately confused and enter their answer as '9' (Other / Undecided) -- this answer is problematic as it will not allow student to receive any Federal Aid, whether Pell Grant, ACG, SMART or fed'l loans. Online FAFSA -- If they select '9' as their answer, have a 'Pop-up Comment' explain that they have indicated their answer and to explain the difference between 'Undeclared' major status and 'Undecided' degree/certificate aspirations . . .	Steven Winey	<u>10/16/08 10/16/08 FSA Meeting</u> : No change. Place on FOTW Requirements Tracking Summary (RTS) <u>10/20/08 FSA/OPE Meeting</u> : No change_	
18	29	Question 29: Degree/certificate. Prospective and current students may not be familiar with the subcategories of degrees listed in this question. Unless the distinctions are required by statute or necessary for determining aid packages, we recommend combining the two associate degree answer options into one answer labeled "Associate degree," and combining the two certificate or diploma answers into one answer labeled "Certificate or diploma (occupational, technical or education program)."	Lauren Asher	<u>10/16/08 FSA Meeting</u> : No change. Place on FAFSA Paper RTS for 2010-2011 <u>10/20/08 FSA/OPE Meeting</u> : No change	

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19	31	Question 31 -- They are filling out an application for Federal Student Aid, and their FAFSA results will also be used in processing State and institutional aid. It seems to me that the answer '5' Don't Know is neither helpful to them nor to financial aid professionals who are trying to package aid for these students in a timely way. Please consider removing this answer from the options -- force the student to make a decision. If they change their minds regarding this question, they can always contact their financial aid counselor or submit a correction on their FAFSA. ** By the way -- I like the way you have integrated Worksheets A, B, and C into the Student Section and the Parents Financial Section.	Steven Winey	<u>10/16/08 FSA Meeting</u> : No change_ <u>10/20/08 FSA/OPE Meeting</u> : No change	
20	31	I question the need for question 31 and recommend its elimination to save space.	Mark Kantrowitz	<u>10/16/08 FSA Meeting</u> : No change_ <u>10/20/08 FSA/OPE Meeting</u> : No change	
21	31	Question 31: Work-study/Student loans. We are concerned that the current language ("In addition to grants, are you interested in work-study or student loans?") gives students the impression that they are agreeing to accept these types of aid if offered to them. We recommend changing the question to say: "In addition to grants, are you interested in being considered for work-study or student loans? Note: Your answer will not affect your eligibility for grants, and you do not have to accept these types of aid if offered to you."	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Question: Accept change. Notes: No change <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/16/08 meeting decision. Place on FOTW & FAFSA Paper RTS	
22	32	I think the wording under the notes for question 32 regarding the TEACH grant should read either "agree to teach" or "commit to teach" rather than "intend."	Susan Marie Johnson	<u>10/16/08 FSA Meeting</u> : No change. TEACH grant recipients sign an 'Agreement to Serve' document prior to Grant disbursement <u>10/20/08 FSA/OPE Meeting</u> : No change. Concur with 10/16/08 meeting decision	

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23	32	Notes for question 32 (page 6). It would be helpful to direct students to the specific website that houses information on the TEACH Grant Program, instead of the Department's general student aid website, as not all FAFSA applicants will have the internet search knowledge to find this information. We also recommend that the Department acquire and use a shorter and more intuitive web address (such as <a href="http://www.TEACHgrant.gov">www.TEACHgrant.gov</a> ) that will redirect to the current URL ( <a href="http://studentaid.ed.gov/PORTALSWebApp/students/english/TEACH.jsp">http://studentaid.ed.gov/PORTALSWebApp/students/english/TEACH.jsp</a> ).	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Accept. The Department has established a short URL ( <a href="http://www.teachgrant.ed.gov">www.teachgrant.ed.gov</a> ) that links (i.e., redirects) to the Student Aid on the Web page about TEACH Grants. This URL will replace the Student Aid on the Web URL that is currently in the Notes <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/16/08 meeting decision. Place on FOTW & FAFSA Paper RTS	
24	34	In regards to FAFSA changes, I'd like to make a recommendation for a change effective immediately. The FAFSA on the Web allows students and parents to skip the asset questions if the student and/or parent could have filed a 1040EZ or 1040A. When we receive a student's Selected ISIR, we collect the appropriate tax returns. When we determine that the student and/or parent were required to file a 1040, we then have to do a 2nd follow up to collect asset information. We have to do this because when we correct the FAFSA questions # 34 & # 78 and send electronic corrections to CPS, our corrections reject because the asset sections were left blank from the original FAFSA. Again, this causes us secondary follow up and needless delays on us awarding students. I'd like to recommend that everyone be required to provide their asset information, and then let the FAFSA response to the above questions determine whether or not the student is eligible for the Simplified Needs Test or not. Thanks for your consideration.	Laura Heimbach	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
25	39	In questions 39 and 40, why remove the "You" and "Your Spouse", given that there's room? While embedding the instructions for questions 39 and 40 is an improvement, the instructions still do not accurately reflect income earned from work. See <a href="http://www.finaid.org/fafsa/earnedincome.phtml">http://www.finaid.org/fafsa/earnedincome.phtml</a> for a discussion.	Mark Kantrowitz	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

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26	42	<p>Hi! Thank you for allowing and requesting comments on the DRAFT copy of the 2009-10 FAFSA. I have a couple of comments in regards to the equity on student's/parents'(s) investments and business/farm. Each year, my staff find themselves calling, emailing and corresponding with students and their families about erroneous information submitted on the FAFSA in regards to investments and other real estate. While it is more prominent on the parents' (s) area than on the student's, it is still an item that I think needs clear wording on the questions and instructions since both questions #42 and #92 ask for the same type of information from the student and the parent(s) respectively. Most of the time, the parent(s) either include the value of their retirement plan OR they omit the equity on other real estate (which we follow up from the Schedule E-1040 Form). If the question can be split, like it used to be a few years back, to request information on investments separately from other real estate equity, I think it will alleviate a lot of the work and time we spend following up. In addition to splitting the question, please allow parents to report figures in excess of \$999,999. Since most of the FAFSA's are now completed online, I don't think that space is an issue here.</p>	Gilma Lopez	<p><u>10/16/08 FSA Meeting</u>: No change. Place on FOTW Requirements Tracking Summary (RTS)  <u>10/20/08 FSA/OPE Meeting</u>: No change. Place on the FAFSA Paper RTS for 2010-2011</p>	

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27	42	Hello. Recent guidance from the Dept. of Education (Michelle Belton) clarifying the reporting of business value is not reflected on page 2 of the "notes" for questions 42-43 and 92-93. The family owned and controlled means 50% or more ownership of the business by a member of the family who is listed in the household size on the FAFSA. We have found that families who own businesses point to the directions in the FAFSA and argue with the financial aid office about this point. They simply see the less than 100 employees and don't understand the interpretation by ED of the "family owned and controlled". Thank you for your time and guidance.	Sheryl Mihopulos	<p><u>10/16/08 FSA Meeting</u>: Need clarification from Policy</p> <p><u>10/20/08 FSA/OPE Meeting</u>: OPE will review</p> <p><u>10/31/08 Email from Fred Sellers</u>: Business value does not include the value of a small business that if your family (your spouse and/or your parents) owns and controls more than 50% of the business and that the business has 100 or fewer full-time or full-time equivalent employees. For small business value, your family includes (1) persons directly related to you such as a parent, sister, or cousin or (2) persons who are or were related to you by marriage such as a spouse, step-parent, or sister-in-law. [start new paragraph with family farm since family is different and is no change:] Invest farm value does not include the value of a family farm that you (your spouse and/or your parents) live on and operate. Note: We need to talk to Ron Sann next week on whether the family definition for family farm is still just the student, spouse, parents. Looks odd next to the one for small business value.</p>	
28	42	Why is net worth limited to \$999,999? We have families that have net worth significantly greater than \$1,000,000 that would be 'no need'. However, since they are restricted to reporting net worth as \$999,999, they qualify for subsidized federal aid. This does not seem fair that taxpayers should have to pay the subsidy on this need based aid for a family who would not qualify if the net worth field could accept a value greater than \$999,999.	Elaine F. Solinga	<p><u>10/16/08 FSA Meeting</u>: Need clarification from Policy</p> <p><u>10/20/08 FSA/OPE Meeting</u>: FSA to review</p> <p><u>10/23/08 FSA Meeting</u>: No change. Place on FOTW &amp; FAFSA Paper RTS for 2010-2011</p>	



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29	43	In regards to items #43 and #93, my staff find themselves deleting the figures reported by the students and parent(s) after we find out that the business employs less than 100 employees. Please make the question and instructions more clear about this. Thank you again for allowing input regarding the draft copy of the FAFSA and for taking the time to read my comments. Take care!	Gilma Lopez	<u>10/16/08 FSA Meeting</u> : Need clarification from Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
30	44	In addition to the type of veterans education benefits I suggest adding back in the questions ... # of months and monthly amount. Thank you	Kathy Omeara	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
31	44	I like the new layout – the yes/no question for veteran’s benefits, filling in the oval for grade level and expected enrollment, and the way worksheet B&C have been incorporated.	Susan Marie Johnson	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
32	45	I am at a loss when answering question #45. There needs to be a definition of what the different types of aid are like there is for questions 58-60, 103 and many others. I don’t have access to the chapters mentioned. I am a TRIO counselor and complete 300-400 FAFSAs a year	Sandy Paxton	<u>10/16/08 FSA Meeting</u> : Is there a hyperlink to VA that would be value added for this question? <u>10/20/08 FSA/OPE Meeting</u> : No change. Questions 44 - 45 will be asked in 2009-2010, but deleted in 2010-2011	
33	46	It looks so much better without the worksheet. Thank you. Page 7 - question 46, e. Page 9 - question 94, e. Combat pay is never included in the AGI, unless the IRS is changing the tax form. None of the contents of Box 12 on the W2 appear in the AGI. Page 2 of Form 1040, #66, b, is where nontaxable combat pay is listed but not included in any calculation. Thank you for this opportunity to give you input.	Shirley Hamilton	<u>10/16/08 FSA Meeting</u> : Can we remove this question from the paper FAFSA? <u>10/20/08 FSA/OPE Meeting</u> : OPE to review <u>10/23/08 FSA Meeting</u> : Wording change to 2009-2010 FAFSA Paper (update to be provided by Dan Klock); Additional Notes and Help text for FOTW  <u>11/17/08 FSA/OPE Meeting</u> : Confirmation from FSA that this section has been updated and is accurate	

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34	46	How is combat pay being addressed, is it still going to be used as income earned from work? Combat pay and 1040A auto zero under 20,000? We have a large military population and see a lot of people filing a 1040A with combat pay in excess of \$30,000, who are qualifying for a full PELL grant, is that issue going to continue?	Pearl Creviston	<u>10/16/08 FSA Meeting</u> : (See Above)	
35	48	Question 48: Age. Once individuals have established that they are independent students by answering "yes" to one question in Step Three, it is unnecessary for them to answer the remaining questions in the section. As age is the most common way to qualify as an independent student, we recommend allowing students who answer "yes" to question 48 to skip the other Step Three questions (assuming that questions 51 and 52 are not used to determine eligibility for military educational benefits). For the paper version of the FAFSA, we recommend adding this text to the end of question 48: "If "yes" skip questions 49-60 and proceed directly to Step Four." Similar language should be added to the FAFSA on the Web Worksheet, and skip logic should be employed in the online FAFSA to achieve this goal.	Lauren Asher	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
36	49	Provide clear guidance regarding the marital status at the time they sign the FAFSA and the fact that they cannot change marital status on a subsequent submission.	Roger	<u>10/16/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

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37	52	Notes for question 52 (page 7). The Notes fail to describe all possible scenarios under which the answer "No" should be selected as specified in 20 U.S.C. 1087vv(c)(1)(B). Here is the statutory language, with italics for emphasis: (c) Veteran and veterans' education benefits (1) The term "veteran" means any individual who— (A) has engaged in the active duty in the United States Army, Navy, Air Force, Marines, or Coast Guard; and (B) was released under a condition other than dishonorable. To comply with the statute, the following criterion should be added to the end of the second paragraph: "or (4) were engaged in active duty in the U.S. Armed Forces but released under dishonorable conditions."	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Accept change <u>10/20/08 FSA/OPE Meeting</u> : Accept change. Add this additional status to list of "No" responses for the Note for Question 52: "or (4) were engaged in active duty in the U.S. Armed Forces but released under dishonorable conditions." <u>10/23/08 FSA Meeting</u> : Accept change. Place on FOTW & FAFSA Paper RTS for 2009-2010	
38	54	Question #54 on the FAFSA asks "Do you have dependents (other than your children or spouse....)". However, in the Application and Verification Guide, it states "Children and legal dependents". Often we get students who are obviously trying to make themselves independent by listing a sibling or niece or nephew as a dependent. We explain to them that the dependent has to be a "legal" dependent (as stated in the AVG). But, students don't see the word "legal" on the FAFSA. I think the word "legal" should be added to the FAFSA to match the wording on the AVG.	Rodney Clements	<u>10/16/08 FSA Meeting</u> : Need clarification from Policy <u>10/20/08 FSA/OPE Meeting</u> : No change. Clarification needed in AVG.	
39	55-57	Question 55: When you were age 13 or older, were both your parents deceased, were you in foster care or were you a dependent/ward of the court? We have had several students that were in temporary foster care or a ward of the court and then released to their parents and are currently with their parents prior to turning 18 years of age. This question reads at any time a student was in foster care or a ward of the court they are automatically independent. Is this correct or should the wording be changes to say still in foster care or a still a dependent/ward of the court.	Cora L. Moretta	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	

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40	55-57	In the review of the draft FAFSA for 09-10, we want to comment on question #55. The wording for question 55, as well as the instructions for this question, is confusing. For the question, we suggest changing the wording to say, "Are both of your parent's deceased, or when you were age 13 or older, were you in foster care or were you a dependent/ward of the court?" This makes more sense because it doesn't matter when their parents were deceased, if that is the status as of the date FAFSA is being filed. For the instructions for this question, it is confusing because it says "answer yes to this question even if you are now adopted," but does not the FAFSA want the student to use the information of the adoptive parents if they are not both deceased? This makes it sound like the student does not need to use their information, as long as at one point (before adoption by current parents) they had been orphaned? Thank you for your consideration of this feedback.	Sandra Loerts	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
41	55-57	Page 3, Notes for questions 56 and 57 (page 7). Modify and expand the note to clearly explain question 56 and 57 on page 7 in light of the changes in the HEOA. (Reason/Cite: PL 110-315, HEOA Section 473 (c) (1) new (B) and (C)). Step 3, Page 7, Questions 56 and 57. Question requires revision in view of cited clarification in HEOA. (Reason/Cite: PL 110-315, HEOA Section 473 (c) (1) new (B) and (C)).	Roger	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : Delete "As of today" from questions 56 & 57. OPE to review <u>11/17/08 FSA/OPE Meeting</u> : Place on the 2010-2011 FAFSA RTS for consideration	

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42	55-57	Ladies and gentlemen. I am concerned about the dependency status questions that are expanded to include applicants who were in foster care, emancipated minors, minors in legal guardianship, homeless, or at risk for homelessness. Although I understand the intent, there are numerous students in Ohio public school systems that live with "legal guardians" enabling them to attend another public school system other than the one their parents live in. These students have "legal guardians" for the sole purpose of allowing them to attend a preferred school. For example, to play on their favorite, or preferred athletic team. These students have parents who allow this to occur for numerous situations, but these parents are in many cases well-off economically. Please consider this when making the final draft. Thank you.	Wendell Schick	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
43	55-57	Hi! On question # 55 if a student cannot provide verification do we correct the answer to no? On questions # 56 & 57 if the student has a court order that's in effect from another state would they answer yes?	Jerry Loheide	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change <u>10/23/08 FSA Meeting</u> : Forward to Brian Schelling (FSA) to consider update to Application and Verification Guide (AVG)	

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44	55-57	I reviewed the proposed FAFSA and have the following concerns: Page 7, Step 3. Question 55 reads, "When you were 13 years or older, were both parents deceased, were you in foster care or were you a dependent/ward of the court?" The way this reads, students who were in foster care or wards of the court for even 6 months at age 14 and then returned to their parents) would still check "Yes" and be considered independent. Is this what the regulations intended? Also, students with parents who were deceased prior to the age of 13 may be confused by the question. Question 56 and 57 reads, "As of today, are you (an emancipated minor) in legal guardianship as determined by a court in your state of legal residence?" By prefacing the question with, "As of today", this only helps minors. What happens to these same students when they turn 18? Will they have to answer, "No" and seek professional judgment?	Carolyn Karno	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
45	55-57	Emancipation is going to create problems. Just because a child has turned 18 and a parent feels they should be on their own or a financial planner recommends this approach to increase aid eligibility or because they are a child of an attorney etc is not a reason to give them a Pell Grant. Emancipation is already covered under Professional Judgement for those that can really document unusual issues.	Rick Weems	<u>10/16/08 FSA Meeting</u> : No change. <u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
46	55-57	Question 55: Foster youth/Ward of the court. For clarification, we recommend the following revision: "At any time since you turned age 13, were both your parents deceased, were you in foster care or were you a dependent/ward of the court?"	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : Accept <u>10/23/08 FSA Meeting</u> : Place on FOTW & FAFSA Paper RTS for 2009-2010	

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47	55-57	Regarding Q. 57 and legal guardianship, most of the legal guardianship court orders that I have seen expire when the student becomes 18 years of age. If the intent of this question is to relieve the burden of so many Dependency Overrides by FAOs, I would suggest that the question be re-worded to ask if the student was in a legal guardianship until the age of 18. I have several students who could avoid a full dependency evaluation just by being able to answer "yes" to this question, but they cannot answer "yes" if the guardianship has expired.	Kendra Burnette	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
48	55-57	First of all I want to say that we all agree with the removal of the Worksheets (implementing it into the form is much easier to read). One of the areas we focused on and were more concerned on were all of the "yes" and "no" questions for marking dependency. There are now 13 questions as opposed to less in the prior years. The more we separate out the questions, the more confused a student will get. A big emphasis is in questions 55 through 59 (how many times can we ask a student in a different context if they have been "homeless")? I think all these questions can fall into one category and, as we have for other questions such as the drug conviction, we can have a worksheet for FA professionals to determine their dependency status. Too many questions bring more confusion on the up-front. For example, one question could assist in all of these such as: "As of today, do you have or have you had a change in guardianship as determined by the court?" Once again, a professional worksheet can determine from there.	Pamela Miller	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change <u>10/23/08 FSA Meeting</u> : Place on FAFSA Paper RTS for 2010-2011	
49	55-57	Emancipated minors: what happens if the order is no longer in effect (ie, under age 24 (21 example)	Shirley J. Lyberger	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
50	55-57	Notes for question 55 (page 7). For clarification and simplification, we suggest changing the Note to say: "Answer "Yes" if at any time since turning age 13: · You had no living parent (biological or adoptive), even if you are now adopted; or · You were in foster care, even if you are no longer in foster care as of today; or You were a dependent/ward of the court, even if you are no longer a dependent/ward of the court as of today."	Lauren Asher	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : Edit Notes for Question 55 to read: "At any time since you turned age 13, were both your parents deceased, were you in foster care or were you a dependent/ward of the court? Answer YES if you had..."	
51	58	Questions 58 through 60 appear to be redundant. Recommend combining them in to a single question. "At any time on or after July 1, 2008 were you determined to be an unaccompanied youth who was homeless by one or more of the organizations listed in the Notes on page 3?" Benefits from Federal Benefits Program.	Leonard Gude	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
52	58	To Whom It May Concern: I am writing to offer comments on the proposed FAFSA application for July 1, 2009- June 30, 2010. As a youth service professional who has been working with or on behalf of homeless, runaway and street-involved youth for over 20 year, it is extremely gratifying to see unaccompanied youth recognized as in need of an exemption from parental participation in the application process. Far too many young people who are homeless have been stymied in their quest for higher education by the onerous requirement that they have their parents provide information on the forms. My one concern about the proposed application is the gap created between those eligible to apply as unaccompanied youth (under 21), and your age of independence for all students (24). Under the proposed application, questions 58, 59 and 60 only apply to "youth" defined as someone under the age of 21 or still enrolled in high school. There are many young adults who have successfully completed their GEDs or have completed high school while homeless. If these young people are ages 21 through 23 they would be ineligible for student aid as a homeless youth under your narrow definition. To remedy this inequity, you could expand the definition of homeless youth to someone under the age of 24 or you could add another category of homeless young adult with "young adult" defined as person under the age of 24 and simply add "or homeless young adult" to questions 58, 59 and 60. Thank you in advance for your consideration of this comment.	Empire State Coalition	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : Address 'gap' issue in AVG. No change	



Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
53	58	Dear DOE, Thank you for the opportunity to voice our opinions about the 2009-2010 FAFSA. I work at a two-year community college in Southern California. We see many attempts of abusing the federal aid program. We require students to submit proof of independent status. How are we to confirm someone is homeless or at risk of being homeless? In fact, I don't think this problem will be unique to the community college system. For years we have heard about the need for more Pell Grants for needy students. However, this question of being homeless allowing students to be independent, just opens the door for flagrant abuse of the federal program across all sectors. I strongly feel that low income is enough of a litmus test for need-based aid. Why are we opening the floodgates for abuse??? I've been a financial aid administrator for 17 years and have seen some really creative ways students and parents make themselves need-based eligible. As a financial aid administrator and tax payer, I find this avenue of independence to be fiscally irresponsible. I would like to see students who are truly needy get more funding not people who see loopholes in abusing the program. Please reconsider this question for determining independent status. Correct me if I am wrong, doesn't the Pell program always operate in the red? Certainly this "homeless" factor will further put the program in the red. I am dead set against it.	Kim Legier	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
54	58	Page 3, Notes for questions 58-60 "Answer "No" phrase. Direct the student to local social services where they can obtain an official determination rather than the financial aid office. Directing the applicant to the financial aid office for assistance because the applicant "believes" they meet the conditions places a burden on the financial aid office to perform external investigation of an issue that is within the purview of social services. The financial aid office does not have the resources to make a documented determination of this status. Even if the financial aid office refers the student to the local social services offices, an additional step for the applicant has been created.	Roger	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
55	58	On questions 58-60 what is a determination and what type of verification is acceptable for schools to collect? Thanks.	Jerry Loheide	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change <u>10/23/08 FSA Meeting</u> : Forward to Brian Schelling (FSA) to consider update to Application and Verification Guide (AVG)	
56	58	Questions 58, 59, 60 all deal with homeless, unaccompanied youth who probably have no idea what type of funding their shelter receives. It's not as if shelters have signs stating funded through HUD. I am not aware of any Connecticut school districts that have a school district homeless liaison so I assume that many districts assign these duties to a school administrator. I think these questions could be combined and simplified.	Carolyn Karno	<u>10/16/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
57	58	<p>Questions 58-60: Unaccompanied homeless youth. Our proposed changes address a statutory issue in the draft while simultaneously making it easier for students to understand what they are being asked. As detailed below, we recommend that instead of asking three separate questions that attempt to capture the various ways an applicant might qualify as an independent student due to being homeless or at risk of homelessness, the form should ask just one simple question accompanied by a more detailed Notes section. The College Cost Reduction and Access Act of 2007 (CCRAA) specifies that certain unaccompanied youth are considered independent if they are homeless or are self-supporting and at risk of homelessness, and if they receive an official determination of their status from one of four sources. However, the draft language for questions 58 and 59 does not currently include those who are determined to be self-supporting and at risk of homelessness, as mandated by the CCRAA in section 604(a)(2). Here is the statutory language, with italics for emphasis:</p> <p>“(H) has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act), or as unaccompanied, at risk of homelessness, and self-supporting, by—</p> <p>“(i) a local educational agency homeless liaison, designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act;</p> <p>“(ii) the director of a program funded under the Runaway and Homeless Youth Act or a designee of the director;</p> <p>“(iii) the director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (relating to emergency shelter grants) or a designee of the director; or</p>	Lauren Asher	<p><u>10/16/08 FSA Meeting</u>: Need to have broader discussion with Policy</p> <p><u>10/20/08 FSA/OPE Meeting</u>: No change</p>	
58	58	Homeless or in danger: What authority can determine, what happens to the 21-year-old (not at “youth” but not in custody of parent –kicked out)?	Shirley J. Lyberger	<p><u>10/16/08 FSA Meeting</u>: Need to have broader discussion with Policy</p> <p><u>10/20/08 FSA/OPE Meeting</u>: Update AVG. No change</p>	

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59	61	For question 61, I strongly suggest either making divorced and seperated 2 seperate choices or defining seperation for Federal Guidlines. Several students say their parents haven't been together for X amount of years but they're not legally divorced so they put "married". Hope this helps.	Stephanie Gardiner	<u>10/16/08 FSA Meeting</u> : Change responses to read: "Married or Divorced"; "Single"; "Divorced or Separated"; and "Widowed". Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/16/08 meeting decision	
60	66	Hello. Here are a few comments from reading the 2009-10 FAFSA draft: For Questions #9, #66 and #70 of the FAFSA. Why not standardize the form to list the year as YYYY instead of 19YY even when referencing birthdates.	Odette Franceskino	<u>10/17/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : No change	
61	73	Parent Status of Legal Residency. Question 73 is redundant and could be calculated based on the student's response to question 74.	Leonard Gude	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
62	74	Parents' Email Address. We recommend adding this sentence to the end of question 71: "If your parent(s) do not have an email address, leave this question blank."	Lauren Asher	<u>10/17/08 FSA Meeting</u> : Accept. Reword parenthetical statement to read: (If you provide your parents email address we will let them know that your FAFSA has been processed.) <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/17/08 meeting decision <u>10/23/08 FSA Meeting</u> : Accept. Place on the FAFSA Paper RTS for 2009-2010	
63	75	I have just reviewed the 09-10 FAFSA, and had a comment about number 75. I feel it would be better to change the first two items in the list for who to include in the parents' household to: 1. yourself, even if you don't live with your parents; 2. your parents. Since this is the parents' section, it should be obvious that the parents should be included in the household, but often the students do not include themselves if they do not live with the parent. This way, it clearly states that the student is to be included even if they do not live with the parent. Thank you for your time.	Jaime Schulang	<u>10/17/08 FSA Meeting</u> : Accept. Reword the responses to read: "yourself, even if you don't live with your parents; your parents; etc." Place on FOTW & FAFSA Paper RTS for 2009-2010 <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/17/08 meeting decision	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
64	75	Question 75 & 77: Will the order of these questions be the same on the FOTW worksheet? It needs to be. In 2008-09 on the FOTW worksheet, the question about parents' household members' receipt of the federal benefit programs came BEFORE the question about # of people in parents' household (the reverse of the order on the paper FAFSA). These questions should come in the same order on the FOTW worksheet.	Jim Green	<u>10/17/08 FSA Meeting</u> : No change. Place on FOTW RTS <u>10/20/08 FSA/OPE Meeting</u> : No change	
65	75	Although question 75 indicates only include individuals who will be receiving more than half their support from the parent, we think some language to clarify that foster children should not be included (since support is being received by the state) would be helpful. It's inconsistent with question 95c, which directs parents not to include foster or adoption payments for such children, so they should be instructed not to include them in the household.	Val Meyers	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
66	76	For Questions #76 and #97 of the FAFSA regarding number in college ... a program that leads to a college degree or certificate (add) at a school eligible for any of the Title IV (Federal Student Aid) programs. If you need to add a note reference for this statement in the instructions (see page 28 of the 2008 Application and Verification Guide) an example of an exclusion would be students at a U.S military academy because most of their primary educational expenses are paid for. I like the incorporation of the worksheets in the body of the FAFSA. Thank you for sharing the draft!	Odette Franceskino	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
67	77	Combine questions 77 through 81 into a single question. "In 2007 or 2008, did you, your parents, or anyone in your parents' household, receive benefits from Social Security Income, Food Stamps, Free or Reduced Price Lunch, TANF or WIC? Yes No" Combine questions 98 through 102 into a single question. "In 2007 or 2008, did you, ( or your spouse) or anyone in your household, receive benefits from Social Security Income, Food Stamps, Free or Reduced Price Lunch, TANF or WIC? Yes No"	Leonard Gude	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

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68	77	I could not find if TANF and WIC were spelled out anywhere on the form. If they aren't spelled out, I think they should be.	Susan Marie Johnson	<u>10/17/08 FSA Meeting</u> : Accept. Add final sentence to question(s) instructions to read: 'The TANF program might have a different name in your state. To determine if you are a TANF recipient, phone 1-800-4FED-AID)' <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/16/08 meeting decision	
69	80-81	Questions 80 and 81 (and their corollaries, Questions 101 and 102): Federal Benefits. As currently written, these questions require a level of knowledge about government programs that applicants are unlikely to have. In particular, Question 80, and its companion Question 101, assume that applicants will know what TANF is by the acronym alone, and will know whether they "receive benefits" through TANF. Although TANF is a federal benefit, it is administered at the state level and goes by very different names in different states. For example, it is called CalWorks in California, MFIP (Minnesota Family Investment Program) in Minnesota, and WAGES (Work and Gain Economic Self-Sufficiency) in Florida. There is no reason that recipients in these and many other states would know that their benefit actually comes through TANF. The very-low-income students and families who receive TANF benefits are those most in need of federal financial aid to attend and succeed in college. It is essential that applicants can easily determine the correct answer to question 80 as well as the other questions related to means-tested benefits, because these questions directly affect eligibility for the Simplified Needs Test and Automatic-Zero EFC. Questions 80, 81, 101, and 102 should be accompanied by an explanation in the Notes section. The Notes should spell out the full names of both TANF and WIC (similar to the 2008-2009 FAFSA), but also, and much more importantly, include the following explanation: "TANF is sometimes called "welfare" and may have a different name in your state. To find the name of your state's program, see [URL] or call	Lauren Asher	<u>10/17/08 Meeting</u> : Accept change. See Meeting Notes above <u>10/20/08 FSA/OPE Meeting</u> : Concur with 10/16/08 meeting decision	
70	85	Questions 85 and 103: There is no time period provided. For example, I could have lost my job or been laid off 5 years ago and could truthfully answer Yes to the question, even though I have since found another job or career. I think a time period (during or since the previous calendar year) should be included for clarification.	Jim Green	<u>10/17/08 FSA Meeting</u> : No change. <u>10/20/08 FSA/OPE Meeting</u> : No change	

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71	85	Page 8, question 85 pertains to dislocated workers. According to the instructions provided, just about anyone who has been let go from a job could claim they are dislocated. Is this what the regulations intended?	Carolyn Karno	<u>10/17/08 Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
72	85	...number 85 when parents are asked to report if they are a dislocated worker which includes unemployment information. There is no question for the students to complete this information therefore creating a lack of reporting on the independent student's case. I understand this question may be trying to supply the correct amount of aid based on a student or parent's income but we need to have this question either on both sides (student and parent) or leave it off and use the professional judgment to determine this.	Pamela Miller	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
73	85	Question 85: Dislocated worker. For grammatical agreement, we suggest changing the language of question 85 to: "Is either of your parents a dislocated worker?"	Lauren Asher	<u>10/17/08 FSA Meeting</u> : Confirm grammar with Writer-Editor staff. <u>10/20/08 FSA/OPE Meeting</u> : Per email from Cindy Cameron (FSA) on 10/18/08, the sentence should read: "As of today, is either of your parents a dislocated worker?" Place on FOTW & FAFSA Paper RTS for 2009-2010	
74	86	Question #86 and 87 should refer to the people referenced in question #75 - perhaps clarification there? State parent/stepparent not parents(s) in guidelines on Q75. Too many students add dad's info to mom's even though they are divorced....Also, could you include information telling them that if the parent is remarried at the time they fill out the FAFSA, but wasn't married the prior year, be sure to combine tax/income information...	Pam Palermo	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

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75	94	Just a few of my comments. In question 94. Parents' 2008 Additional Financial Information Items C. Taxable earnings from need-based employment programs such as work-study and D. Student Grant and Scholarship aid reported to the IRS in your adjusted gross income. I believe we should preface the question, "if the parent(s) was a student during the 2008 year". I get many questions about this question as parents wonder if they are supposed to put what the student reported as grant income here and work-study employment as most parents are not in school at the same time as their children and thus have no idea about reporting student grant/scholarship aid as income to the IRS.	Mary Bauer	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : FSA will consider new wording for Question 94	
76	94	Questions 94 and 95. Please increase the font size to make these questions easier to read.	Lauren Asher	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
77	General	Thank you for the opportunity to comment. This version takes the FAFSA to an extreme that will drive applicants away. This version is truly over-kill and in no way simplifies the application process. Even after working in financial aid for 30 years, my eyes roll when looking at this form. It might be great for a tax accountant but not for the average family. Please reduce some of the entries from worksheets.	Mary Edington	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
78	General	I respectfully offer comments about the draft 2009-2010 FAFSA that I just reviewed. The FAFSA is now six fully packed pages for students and parents to complete. Six pages! Congress indicated a desire for the Department of Education to simplify the financial aid application process. I do not believe a six page application, which is four pages more than most people's IRS tax returns, meets that desire. I strongly encourage a greater effort to reduce unnecessary items, and to reduce the length of this most important application. With respect.	Dart Humeston	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	



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79	General	<p>First, FAFSA 2008-2009 gave the students and parents the option to not answer questions about their income. Most of our students opt out to answer this question, which embarked an overload for office verification for our office. Giving the students this option should not be a choice, but required. All STUDENTS and/or PARENTS should have to answer questions regarding their income. Secondly, the question regarding if a student has a high school diploma or GED should be a requirement as well. No student without this requirement, regardless of any institution she/she attends, will not be allowed to attend school without a high school diploma or GED. I plead with you to take these two things into consideration when making changes to the new 2009-2010 FAFSA Application. Thank</p>	Deborah Donald	<p><u>10/17/08 FSA Meeting</u>: No change  <u>10/20/08 FSA/OPE Meeting</u>: No change</p>	

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80	General	<p>My comments are mostly in relation to the on-line FAFSA and the use of 'skip-logic' and some other observations which might relate to programming. Understand, I'm an end-user who processes FAFSA data into our administrative system and get to work through many of the errors which block processing properly. Section Headers which begin with 'Step . . .' -- would recommend a change which would clearly identify the section with Student or Parent info:</p> <p>Step 1 - Student: For questions 1-32 . . .</p> <p>Step 2 - Student: Answer questions 33-60 . . .</p> <p>Step 3 - Student: Answer all questions in this step to determine . . .</p> <p>Step 4 - Parent Information: Complete this step if the student answered "No" to all questions in Step 3.</p> <p>Step 5 - Student: Complete this step only if the student answered "Yes" to any question in Step 3.</p> <p>** Online 'skip-logic' programming: If a student did not answer "Yes" to any of the Step 3 'Dependency Status' questions, then do not allow them access to questions 96-103.</p> <p>** I know it doesn't go into their EFC calc, but it makes no sense as they will sometimes come back and make corrections to this info which is unnecessary to even review</p> <p>Step 6 - Student: Indicate which colleges you want . . . Consider having a 'Pop-up Comment' which would state something to the effect "If you have determined that you will definitely not be attending one of the schools indicated, please remove them as a 'destination point for your FAFSA data.' If you change your mind, you can certainly submit a correction and add them back to the list at a later time. This would help eliminate processing time/work on the financial aid staff as FAFSA's for students who have no intent to attend would not come into our systems for processing. - this is especially true of 'Renewal FAFSAs'. Just some ideas for your consideration as you make improvements to the FAFSA</p>	Steven Winey	<p><u>10/17/08 FSA Meeting</u>: No change. Place on FOTW Requirements Tracking Summary (RTS)</p> <p><u>10/20/08 FSA/OPE Meeting</u>: No change</p>	

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81	General	<p>I am providing comments from the financial aid staff at the University of Nebraska at Kearney. We spent a portion of our staff meeting last week reviewing the draft version of the form and have several comments and suggestions. We were pleased to the worksheets eliminated and capturing of untaxed income in the form itself. We also appreciate the thoughtful approach to the layout of the form. We especially like sections where previously instructions were on a different page and now on imbedded with the question (year in school, for example). We realize your staff had a difficult assignment: to try to make as logical and simple as possible a very complicated set of new questions. Job well done. We do have several thoughts on the form for your consideration:  On page 2, under the section "Notes for questions 35 and 84 . . ." The description of who is typically eligible to file a short form is logical and makes sense. However you also have included the "reverse" description. That is the description of who does not qualify. We believe that is too confusing. We would suggest that you eliminate the sentence beginning "A person is not eligible to file a 1040EZ . . ." Keep the sentence beginning "If you filed a 1040 only to claim Hope or Lifetime . . .". We honestly think including both sentences is redundant and might confuse more than help applicants.</p> <p>Under the instructions for questions 58-60 on page 3, is it possible (and we understand that it may not be) to include generally a description of who might make the determination that an individual is an unaccompanied youth. We are concerned that the student may feel like an unaccompanied youth and mark "yes" based upon their own personal analysis. If it is possible (and again we realize this might be not be possible) that the determination is typically made by a state or federal agency, that may help eliminate some erroneous answers.</p>	Mary Sommers	<p><u>10/17/08 FSA Meeting</u>: Update as appropriate. Compare with language on FOTW Worksheet  <u>10/20/08 FSA/OPE Meeting</u>: Concur with 10/17/08 decision</p>	
82	General	<p>For 08-09, CSN received a number of ISIRs from the renewal process where the student failed to answer the HS/GED question on the renewal application because they answered it on their original FAFSA and didn't realize they needed to answer it again. Please emphasize the need to (re) answer the question, or carry the old answer forward on the renewal process. Thanks</p>	Peter Hurley	<p><u>10/17/08 FSA Meeting</u>: No change  <u>10/20/08 FSA/OPE Meeting</u>: No change</p>	

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83	General	<p>Page 2: Notes for questions 38 (page 2): Is this section required? Will it not confuse students/families further? They have already filed their taxes, or their taxes were prepared for them. These students may have no idea on how to answer this question or where to look for guidance. Is this information being tracked? Notes for questions 42-43 (page 2) and 92-93 (page 3): Investments include real estate such as rental property and second homes ...</p> <p>Directions &amp; FAFSA: Questions 55-60 ... These issues are already dealt with through professional judgement at the Institutional level. As the FAFSA indicates, the Institution may ask for documentation to substantiate these answers. I'm not sure how this will benefit students and/or aid offices in facilitating the aid process. Will this in fact impede the process, if the student answers the question incorrectly?</p> <p>Question? Worksheet A has been discarded. When a student/family has low income and indicates social security benefits, may a school use PJ to add these benefits back in worksheet B as untaxed income? Or are these benefits totally excluded from the calculation? The reason I ask, is that I have accounted for some families where both parents are receiving full social security disability benefits, and their calculated EFC precludes them from receiving Pell. Thank you for your time.</p>	Deborah Flinn	<p><u>10/17/08 FSA Meeting</u>: No change</p> <p><u>10/20/08 FSA/OPE Meeting</u>: Consider for 2010-2011: "Notes for Questions 42-43 (page 2) and 92-93 (page3); investments include real estate such as rental property and second homes..." Place on the FAFSA Paper RTS for 2010-2011</p>	
84	General	<p>Step Seven. "will use federal and/or state student financial aid only to pay the cost..." I would suggest "financial aid to pay only the cost..." The way it is written currently implies that students can only use fed/state aid to pay the costs of attendance (not work, private support, etc.) The suggested change makes it clearer that the aid received is to be used only for the costs of education. Thank you for the chance to give feedback.</p>	Lili C Vidal	<p><u>10/17/08 FSA Meeting</u>: No change</p> <p><u>10/20/08 FSA/OPE Meeting</u>: No change</p>	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
85	General	The Office of Financial Aid at Michigan State University thanks you for the opportunity to comment on the 2009-2010 FAFSA. 1) Page 3 (Notes) for questions 61-95 (pages 8 and 9) Step Four. This is the only note that states which "Step" the questions are pertaining to; all others just indicate the question numbers. We are not sure how much consistency matters, if it all. 2) Although there is not language on the paper application direction parent/students to skip asset questions, we wonder if this is going to be true of the web application as well. We found during 2008-09 that parents and students were allowed to skip the asset questions online if it appeared as if they qualified for the simplified needs test. If they were selected for verification and it was determined that they did not qualify for the simplified needs test then reject 1 was created (missing asset information). This caused further delays in finalizing aid as we then needed to follow up for asset information. 3) While the elimination of the Worksheet and incorporation of the questions into the body of the FAFSA is probably more clear for the student and parent, we are still concerned about the density of the form at those points in the form (questions 46 & 47 and 94 & 95). 4) We appreciate the clarity of the additional questions regarding student independence (foster care, emancipated minors, minors in guardianship, etc.)	Val Meyers	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
86	General	As a FAO consultant students give their pin numbers to their parents who in turn use it to apply for their FAFSA. There is no real way to be sure that the information is correct except through the verification process. The biggest gap that I see is that the PELL chart is not focused on working parents and is geared for those with low income. The students whose parents are both working places them in a EFC range to where they qualify for very little of the PELL. The chart actually needs to be flipped upside down and begin with the working parents and move toward those who are going to automatically qualify because of lack of income. Students with a high EFC are forced to borrow loans; yet, those who have a low EFC usually do borrow anyway simply because they can. If the government would stipulate that those who receive the PELL funds be limited to borrowing perhaps there would be less students in default. Since credit history is not a requirement students with low EFC's often view there will not be as much penalty as those who with the high EFC would not take that risk to ruin their parents credit history. In another essence the "War on Poverty" has only emphasized a dependence on the government for funding and use financial aid as a means of income instead of working.	Kathy K Dixon	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
87	General	Step Five: Complete this step only if you (the student) answered "Yes" to any question in Step Three. I think that this should be bolded and say something about skipping to Step 6. So maybe "Step 5 is for students not required to complete Step 4 (parents income). If you were required to provide parental income skip to Step 6 (entering school information)." Or something similar. Most students will not look back and see if they answered Yes to questions in Step 3 and will completely have forgotten step 3 by this point and just continue to fill out all Green Student sections. And last, is it possible to add in the information section what to do if your parent's do not have SSNs (or are not citizens) but the child or the FAFSA applicant does have one and is a citizen? Thank you.	Mary Bauer	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : Consider change for 2010-2011	
88	General	I have a request. For the next FAFSA, please consider adding a line item to address 'Taxable Income'. My rationale for requesting this information is that many federal programs, specifically TRiO programs, require 'taxable income' verification for their federal mandates. We're both federal programs, it would be logical to collect the mandated information on the same form (FAFSA). Please provide feedback on this request. Thank you.	Yolie Kernes	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
89	General	Can you be more clear in the comments when student is selected for verification or has a problem with Social Security Administration or even Selective Service and other? When student is selected for verification or has any edit preventing disbursement, they should be told to contact their school financial aid office and collect financial documents (signed federal taxes); missing documents to be submitted. CPS Customer Service has the habit of telling students that their FAFSA has been processed and often fails to explain to them what they must do if selected for verification. The comment on the SAR is not even clear enough to give student a clue to contact the school. Student believes that once CPS says "application is processed" there is nothing else to do. Thanks.	Abram Bolouvi	<u>11/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
90	General	We think there should be additional/continual clarification before each sub-section of section 4 (Answer all the questions in Step Four about your parents even if you do not live with them. Grandparents, foster parents, legal guardians, aunts and uncles are not considered parents on this form unless they have legally adopted you. If your parents are living and married to each other, answer the questions about them. If your parent is single, widowed, divorced, separated or remarried,...) put this before #86, #91, #94, #95...or do a Remember – parents are considered to be....	Pam Palermo	<u>11/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
91	General	Page 1: Cover Page. Using Your Tax Return. The sentence, “If you have not yet filed your return, you can still submit your FAFSA, but you must provide income and tax information,” is confusing as currently written. We suggest instead: “If you have not yet filed your return, submit your FAFSA with estimated income and tax information.” Filling Out the FAFSA. We recommend two changes to help applicants understand what kinds of “unusual circumstances” are relevant and how to address them: 1) Reword the phrase that begins with “If you or your family has unusual circumstances...,” to say: “If you or your family has unusual circumstances that have caused significant changes to your financial situation since filing your taxes (such as loss of employment), complete this form to the extent you can, then submit it as instructed and consult with the financial aid office at the college(s) where you are applying or attend.” 2) Move the reworded sentence above so that it becomes the second paragraph of the “Using Your Tax Return” section, since it pertains to using your tax return to fill out the FAFSA. Page 4: What is the FAFSA? We suggest making this the second page in the packet so that students have an opportunity to learn more about the FAFSA before they see the Notes pages, where there is a lot of very specific information that could overwhelm and discourage potential applicants from continuing. Also, the information in italics at the bottom of the page is too valuable to be treated like a footnote that may be easily overlooked. We suggest making it part of the above section “Where can I get more information on student aid?” Page 7: FAFSA personal information form The text in the Step Two section on page 7 is very small and difficult to read. In the Step Three section, the font size is improved, but the lack of space between lines makes it even more difficult to read. If both the font size and space between lines cannot be improved, we recommend adding more space between each question in Step Three. Our suggestions below for questions	Lauren Asher	<u>10/17/08 FSA Meeting</u> : Accept change to Page 1. No change for remaining comments. <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
92	General	Could you guys not have so many things to process..it took me a while to send my forms plus the SAT scores..i think that the school should do it for us because they already have the information..and the 60\$ is ok, but we shouldnt have to pay given the fact that college is beyond that amount.!!!	janneyk@aol.com	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	
93	General	My request is in reference to the actual Loan processes. I took out Student loans both subsidized and unsubsidized as well as got inticed into choosing the Parent Plus subsidized and unsubsidized loans. I have two children. On one child alone, once he completed his schooling he & I are responsible to pay four seperate payments each month on his student loans. Due to the complexity of these loans, they cannot all be consolidated into one easy payment plan. Also, to make it even more of a burden, the Parent Plus loans started coming in before he even finished schooling because they say that the parent is already working so they can pay instantly. As his Parent, my arguement is that I receive no benifit of his education toward my income "instantly" so why do they think I would be in any position to pay instantly? I had to put all his loans into Forbearance due to my lack of income to pay. This is no fix as they still accrue interest during this period so really I'm adding on to the worries I already have about future affordability. My annual income is less than \$30,000. I wanted to get my sons into school so they have opportunities beyond what I have and can provide. The child who just finished school makes less than \$500 every two weeks at the job he got through his fine education. This is barely enough to pay his living expenses. His loans total close to \$35,000. His monthly payments will eat up two	arlo001@centurytel.net	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	



Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
94	General	<p>One other thing. In order for my son to get any decent job in his chosen field he also needs to purchase nearly \$10,000 worth of tools and take additional Brand name specified trainings starting at \$5000 which would need to be in his "non-work" hours so he wouldn't even be making money while obtaining these specialized additions. He does not have the tools he needs and is looking at totally dropping out of the automobile mechanics employment because it just isn't feasible. He will be picking an entry level occupation and suplimental job just to pay off loans he isn't even getting the benifits from. This is an area the government can and should consider working on. Starting with Dealerships who pay thier untrained entry level Dealer and office staff more than the guys who make it possible to drive those cars off the lot. My son is on commissions which pay him only while he is logged into a car. Some days that means he actually pays to go to work. They require that he does the Used car 150 point inspections and the New car 50 point inspections without pay. I think that is pretty unethical. They tell him it is because they don't get paid to do those inspections, although those inspections are what they use to market the selling of the cars through their dealership. He cares that the customers who bring their cars to him to be serviced can feel safe after he releases them back but if he does anything beyond the exact specifications he gets no pay for it. And if it takes him longer to do a job than the "alloted" time, which in some</p>	<p>arlo001@centurytel.net</p>	<p><u>10/17/08 FSA Meeting: No change</u>  <u>10/20/08 FSA/OPE Meeting: No change</u></p>	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
95	General	Input: Suggestion 1. The Already Suggested Pre-population of IRS Data into the FAFSA Without having done any research, on the surface, pre-populating IRS data into the FAFSA seems like an excellent idea. I see the benefits as follows: A) This would help prevent confusion with people who are not familiar with tax or financial terminology, be they minorities or not. B) This would help allow for faster completion and submission. Many people are not good at record-keeping, are disorganized, or are divorced/separated. In such cases, records may not be handy for use in completing the FAFSA, delaying the submission. C) This would eliminate the human error that comes with copying figures from other records to the FAFSA. The reduced errors translate into more expedient processing of aid applications. And because financial aid officers would be saved time from correcting errors, they will have more time to help other students. 2. Accommodate Foreign Addresses!!! The FAFSA does not allow for foreign addresses. Well, it does in that students must include their city AND country in the city field. That is a poor workaround, and one that causes processing problems down the road. Our application will either not extract that loan for a file to be transmitted to the DOE (I work at a Direct Lending school), or, if it was transmitted for origination approval, it will reject. Not all students that are eligible for federal loan aid have a home address in the USA. It just seems U.S.-centric and a bit outdated to not have address fields that are outside of the U.S. Thank you for your	Pamela Wright	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	
96	General	Simplifying this process is of great value to American students and their families. The ability to file the FAFSA and access low cost educational financing is vital to our students, making this process difficult invites private competitors to entice students into less desirable loans - another long term financial disaster in the making.	Brandee Chan	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	
97	General	I submitted a FAFSA for the first time in January of this year. I was able to submit the form with no problem. However, it was very time-consuming and, for me, most of the questions did not apply, so I entered either blanks, NA, or 0. For people like me, who submit a 1040A short form to the IRS each year, I suggest you also provide a short FAFSA form. Or, better yet, somehow link the 2 forms. Most of the information I provided on the FAFSA was also available on the 1040A. I submitted my 1040A before i did the FAFSA, so the electronic FAFSA could reach over to the electronic 1040A and copy any needed information.	Patrice Brooks	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
98	General	I like that the Worksheet questions have been integrated into the form. What I don't like is the bouncing back and forth across the page to answer questions in numerical order. Some of the questions are confusing and will require translation from a financial aid professional. Good reason to select all paper FAFSA applicants for mandatory verification, I think. Also, why isn't consent to authorize IRS matching integrated into the signature statement? This would allow pre-population of this vital and confusing information to the FAFSA-on-the-Web webpage. I look forward to your next draft. Thanks much.	Brain Wilson	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	
99	General	Making forms easier is great, it doesn't make obtaining education any easier. With the state of the economy, the cost of health care, medications, gasoline and food many families are not even 'getting' by. If I had to do things over again-I would think twice about going back to school. As a single parent of a special needs child, on welfare I thought I needed the education not only to support us but to learn how to manage my child's disorder better. Now, I have medical problems and I am unable to use my medications as my physician orders, I can't seek the medical services I really need in part because my wages are being garnished to repay my student loan. My loan has tripled in size from 11,000 to 33,000 and the payments I made early on really did not make a difference. I work to maintain my health insurance but am unable to afford my meds, dental care etc. I may be eligible for disability but I'm not ready for that. The Department of Education does not care if I receive medical care or not, they do not appreciate the fact that I am very frugal. My niece is thinking about going to college in a couple of years, I'm sorry to say I don't have any good advice I can give her. Signed, doing without in WV	Terry White	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
100	General	FAFSA Response. In reviewing the 2009-2010 FAFSA our major concern centers in regards to the length and the amount of additional questions that have been added for the coming year. The addition of the specific questions from the Worksheets A-C is a step in the right direction as it makes the process of completing the application more streamlined for students since they no longer need to refer to information that is not on the application. The concern for these sections and for the questions that determine a student's dependency status is the sheer number of questions contained in these sections. Over the last few years there has been a great deal of discussion about making the FAFSA simpler for students and parents to complete. These sections defeat this effort in two regards: First the number of questions that are being asked will discourage students from completing the application just due to the sheer length of the application. Secondly the questions especially the ones dealing with dependency status are both repetitive and confusing. With the new application, 13 questions are needed to determine dependency status and of those thirteen 2 ask about military service, 2 ask about the student's dependents, 3 ask about the student's parents or guardian, and 3 ask whether the student is homeless. It is understandable that the purpose of these questions is to clarify the student's situation, but wouldn't that be better accomplished by an FA administrator which they may have to do even with the purposed questions.	Tim Jacobson, Lisa Roesch & Kristina Hutchins	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
101	General	Looking at a semantic view, most students would already state that the form is overwhelming. Adding more questions or breaking the questions down may make it worse. Thank you.	Pamela Miller	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
102	General	I think the following changes need to be considered THIS YEAR for the 2009-10 FAFSA. Investment Property owner/Managers work every bit as hard keeping their "small business" afloat, and deserve the same consideration as small business owners whose assets do not count against them for financial aid. <a href="http://ifap.ed.gov/fafsa/0801SummaryChanges0910FAFSA.html">http://ifap.ed.gov/fafsa/0801SummaryChanges0910FAFSA.html</a> I would like to suggest that rental property/ or investment property not be considered the same as owning a CD, savings account or money market account. Investment property is not liquid. IF investment property is the family's business it should be treated the same as a family business, with the assets not counting against the family just as a family's business assets are not counted in their asset base. They can't sell their business to pay for college(or no one wil eat), anymore than I can sell my rental properties to pay for college or my family will not eat. I only have a small business, with a few employees- way less than 100 employees, and it should count as a small business not as if I had a pile of cash sitting in a money market account. This property provides our sole income which isn't much,but if I have to sell, I will not have enough income to live off of, let alone send a child to college.	Lisa Hedman	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change.</u>	
103	General	Dear Sir and/or Madam: I have been having an exceptionally difficult time trying to pay for my daughter's educations while living on a fixed income. I am receiving social security disability. I believe it is fair to not have to have the non-taxed portion count. If one has other income that would change his or her ability to afford the education (as evidenced by it being taxed), then it appears it would be reportable and therefore included. I think that this is a very fair resolution to the Social Security dilemma. Thank you.	Southberwick @aol.com	<u>10/17/08 FSA Meeting: No change</u> <u>10/20/08 FSA/OPE Meeting: No change</u>	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
104	General	<p>My comments on the 8/7/08 draft of the 2009-2010 Free Application for Federal Student Aid (FAFSA) appear below. My goal is to make it easier for students to pay for college. In the case of the FAFSA, this involves making the form more efficient, less confusing and less intimidating. The 2009-2010 FAFSA appears to reflect a philosophical shift toward making the form more self-contained. In particular, the worksheets, multiple choice answers to some questions and some instructions are now embedded in the form itself. While this may make the form less confusing for some families, it does increase the length of the form from five pages (including the worksheets) in 2008-2009 to six pages in 2009-2010. This seems to be in conflict with the goal of simplifying the FAFSA. I agree with most of the comments submitted by Lauren Asher of The Institute for College Access and Success (TICAS) on September 23, 2008 and will not repeat them here except where necessary to amplify those comments.</p> <p>Page 1: The title of the form, "Free Application for Federal Student Aid", is bigger than on the 2008-2009 FAFSA. This is an improvement. Perhaps the title could be made even bigger? I suggest adding more emphasis to the word "Free", perhaps by adding a half-point rule underscore under the word "Free". The fine print "US Department of Education, Federal Student Aid" under the FAFSA logo is unreadable 4 point type. I suggest eliminating it to make the "FAFSA" bigger. Also remove the dots arrow from the left side of the "FAFSA", as it is not necessary. The dots already appear in two other places on the page. Unusual circumstances include any financial circumstances that differentiate the family from other families in addition any changes in the family's financial circumstances since the prior tax year. The TICAS recommendation addresses only half of this. Both aspects should be addressed. I suggest giving more examples of special circumstances, such as all of the statutory examples, including tuition expenses at an elementary or</p>	Mark Kantrowitz	<p><u>10/17/08 FSA Meeting</u>: Under Filling Out Your FAFSA, delete the Federal Student Aid gateway URL; Under Mailing Your FAFSA, 2nd paragraph, add: "If you provide an email address, the results of your application - a Student Aid Report (SAR) - will be emailed to you within 3-5 days. If you did not provide an email address, your SAR will be mailed to you within three weeks. To check the status of your application after you have submitted it, visit <a href="http://www.fafsa.ed.gov">www.fafsa.ed.gov</a> or call 1-800-4FED-AID." Under the Notes for the TEACH Grant, substitute <a href="http://www.teachgrant.ed.gov">www.teachgrant.ed.gov</a> for <a href="http://www.studentaid.ed.gov">www.studentaid.ed.gov</a>.</p> <p><u>10/20/08 FSA/OPE Meeting</u>: Concur with 10/17/08 meeting decision</p> <p><u>10/23/08 FSA Meeting</u>: Accept. Place on the FAFSA Paper RTS for 2009-2010</p>	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
105	General	Dear Sir/Madam. I am a financial aid professional and attorney with a client who is a parent of a dependent who receives private disability from a private insurance company for which he paid premiums in after-tax dollars. Although the FAFSA '08-'09 in Worksheet B directs the parent to list "Other untaxed income not reported elsewhere...", and gives several examples including "disability", I would respectfully point out that the federal statute and regulations do not mention "disability" under "other untaxed income". To the contrary, the regulation seems to exclude "private disability" for the reasons that follow: 1. 20 U.S.C. Sec. 1087vv (b) provides the only definition for "untaxed income and benefits" relating to the financial aid program. The term "disability" is not used anywhere within this statute, and it does not appear in any of the 13 specific categories listed under Sec. 1087vv(b)(1)-(13). Although there is a catch-all provision at sec 1087vv (b)(14), this would appear not to include private disability benefits either: "(14) any other untaxed income and benefits, such as Black Lung Benefits, Refugee Assistance, railroad retirement benefits, or benefits received through participation in employment and training activities under title I of the Workforce Investment Act of 1998 [29 U.S.C. 2801 et seq.]."	David Roberts	<u>10/17/08 FSA Meeting</u> : Need to have broader discussion with Policy <u>10/20/08 FSA/OPE Meeting</u> : In the Notes for Question 47i and 95i, add "Social Security Income" after "untaxed Social Security benefits"; in the Question for 47c add "care" after "Don't include foster..."	
106	General	<del>2. As further support, the federal regulation, specifically 34 CFR</del> I feel that this is one of the best FAFSA's that I have seen in a while.	Shelley Draper	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	
107	General	I find the dependency questions on page 7, repetitive and confusing. Educating the Financial Aid Administration staff to accomplish this goal would be easier than having all these confusing questions for the student to answer. I like the fact that Worksheets A, B, and C are incorporated in the main FAFSA, these questions were often times missed or deliberately left blank.	Susan Kronmiller	<u>10/17/08 FSA Meeting</u> : No change <u>10/20/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
108	General	<p>The Austin Chamber has three goals for the recommendations we make for the 2009-2010 proposed electronic FAFSA form:</p> <ul style="list-style-type: none"> <li>· Remove as many duplicative questions as possible and provide clarity to questions as needed. We recommend 9 for removal and 2 for inclusion however your plans to cut questions dramatically have much merit;</li> <li>· Harness electronic capabilities to ease user experience; and</li> <li>· Connect FAFSA and individual financial data in the IRS to increase accuracy and simplify.</li> </ul> <p>The Chamber supports your efforts in FAFSA simplification and is prepared to give appropriate assistance; please do not hesitate to contact me.</p>	Austin Chamber of Commerce	<p><u>10/17/08 FSA Meeting</u>: No change  <u>10/20/08 FSA/OPE Meeting</u>: No change</p>	
109	General	<p>I would like to express a concern regarding the use of an Emancipation judgement to determine a student to be independent for federal financial aid. As I reviewed individual state laws on emancipation I quickly learned that what is true in one state is NOT true in another state. Some states will not even allow a minor under sixteen to seen an order of emancipation - but some will. One of the tenets of federal financial aid rules to determine dependency status has always been something that is true regardless of which state you resident in - you are or aren't born by the given date; you are or aren't married; you are or aren't a veteran. Now with the introduction of emancipation I believe that we will be treating students differently based on their state of residence with the emancipation issue. I believe it would be much better to allow an individual financial aid office to use their professional judgement to determine this - an emancipation could be just one of many facts supporting a student's request. Please feel free to contact me if you have any questions on my comments.</p>	JoAnn Litton	<p><u>10/23/08 FSA Meeting</u>: No change</p>	



Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
110	General	<p>Instruction Format Change. The new format that incorporates notes prior to key questions (e.g. Q 16) is a constructive change and should be applied wherever possible. FAFSA Page 2—Notes for questions 35 (page 6) and 84 (page 8) There is a high incidence of error on this question. The current note text is repetitive and confusing. Suggested text: A person is not eligible to file a 1040A or 1040EZ if he or she makes \$100,000 or more, itemizes deductions, receives income from a business or farm, is self-employed, received alimony, was required to file Schedule D or E, or had expenses/deductions that could only be reported on a 1040. FAFSA Questions 37 and 87. Though the instruction is specific to line items on the tax form, FAFSA filers report taxes withheld or tax paid plus self-employment taxes. Suggested text: Enter ... income tax (not amount withheld) for 2008. Income tax amount is on IRS Form 1040... Do not include self-employment tax. FAFSA Questions 44 and 45 and Notes for Question 45 (Page 2). The reformatting of the questions for veteran's education benefits is problematic. Though the addition of Question 45 will assist in providing information we previously had to request, it is important for packaging purposes to have a monthly value of the benefit. Until verification of the benefit can be made, an estimate is better than no data. The instruction "Note that the financial aid administrator at your college will need you to provide information about the amount of education benefits you received" is perplexing. First, it is presumed that the sentence should read</p>	Sheri K. Thomas	<p><u>10/23/08 FSA Meeting</u>: Forwarding comment about "FAFSA Questions 37 and 87" to Dan Klock (FSA) for clarification. Accept suggested text for "FAFSA Notes for Question 45". Suggested text: Respond to this question only if you will receive veterans' education benefits from July 1, 2008 through June 30, 2009. Enter the source, monthly amount, and number of months. For "FAFSA Page 3 - Notes for questions 58-60 (page 7); FAFSA Question 60 - The Note does not include a definition of self-supporting. Refer to Policy for determination of whether a definition is needed.</p> <p><u>FSA/OPE Meeting 11/17/08</u>:</p> <p>No change</p>	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
111	General	Although Question 23 does intend to encourage students to complete the FAFSA ,we feel strongly that greater clarification is needed by: 1) Targeting the question only to renewing applicants, as this question is superfluous for first-time applicants, who are most likely to be deterred by the complexity of the FAFSA; 2) Re-phrasing the question to more clearly and strongly encourage applicants who have drug convictions to submit the FAFSA; 3) Including a Notes section detailing elements of the penalty as greater information is necessary to help applicants understand the limitations on aid; and 4) including details about the penalty and how to resotre eligibility on the Question 23 Worksheet as additional information to improve applicant understanding of the question and penalty can only help. Lastly, given the high number of young adults who currently use the Internet as well, , we hope that all recommendations discussed with reference to the draft 2009-2010 FAFSA will be considered and applied to the on-line version of the 2009-2010 FAFSA and the accompanying FAFSA and Web Worksheets, which were not provided for public comment.	Hilary O. Shelton (NAACP)	<u>10/23/08 FSA Meeting</u> : No change	
112	General	Great changes will make FA easier for the neediest and least fortunate. Two minuscule comments: Page 8, question 85: Should say "As of today, is either of your parents..." NOT "As of today, ARE either or your parents...". Also Page 4, Paperwork Reduction Act section: The estimate of one hour "for reviewing instruction, searching data resources, gathering data, filling out form and reviewing it" is probably not achievable even for the most accomplished veteran, much less a first-timer. THREE HOURS maybe. Excellent revisions, and concern about kids behind the revisions. Thanks	Walter Desmond	<u>10/23/08 FSA Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
113	General	Feedback on the 2009-2010 Draft of the FAFSA from the University of Colorado at Colorado Springs Financial Aid and Student Employment Office: We would like the enrollment status for each semester (summer, fall and spring) to make a comeback. We used that information to package off of and now find that we have to make a large number of budget duration changes and that affects how much of the efc is assessed. The "don't know" answer for "Able to file a short form?" question that the students guess at and then it effects the formula that they are calculated under should be changed to yes or no only. Regardless of methodology used all students and parents should have to report assets. Too often we are finding that we are changing the answer to the question and assets were not reported and then we cannot send the correction and get a corrected efc. As for the new dependency questions: Question 56, as of today are you an emancipated minor as determined by a court in your state of legal residence? We would like "minor" clarified. We do not want families to think they can emancipate their 19 and 20 year olds in an effort to be independent for FAFSA reasons. We are assuming minor refers to under 18 years of age but would like that clarified to avoid confusion for students who are emancipated after the age of 18. Questions 58, 59, and 60 – Please condense into one question. In the notes, the same notes cover all three of these. There are such	Brooke Koenig	<u>10/23/08 FSA Meeting</u> : No change. Place on the 2010-2011 FAFSA RTS	
114	General	I don't know if it's possible, but I would love to have the information needed for verification pre-printed on the verification form or format for our students after their FAFSA is processed. I figure that it is possible being that after they process their income tax return a pre-filled form is provided to them with the information needed for the FAFSA. This should also be available for verification. Our students get stuck in this process and is often the gatekeeper. We process the FAFSA, but they don't follow through the verification. a note should be added to the form that if changes are necessary, they must update information on the verification form.	Monica Alvarado	<u>10/23/08 FSA Meeting</u> : No change. Email forwarded to Misty Parkinson (FSA) for consideration.	
115	General	I forgot to mention that we should add questions on waivers and it should only be triggered by state when they enter the state on the FAFSA. This could be a checklist to ensure students don't miss out on the aid. At least it should take them to the link like collegefortexans.com.	Monica Alvarado	<u>10/23/08 FSA Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
116	General	I work and assist students process their FAFSA at the high school level and would like to know how I can receive drafts when they become available.	Monica Alvarado	<u>10/23/08 FSA Meeting</u> : No change	
117	General	Could the electronic FAFSA be "restructured" to not allow students to continue if they don't answer the bachelor degree question online? Or, if they submit a paper FAFSA that a corresponding ISIR comment be created to "flag" this? We've noticed files without that question answered and no relating comments on the ISIR. We thought that such an important question not answered would have a comment code in the ISIR as to prevent the student from being eligible for Pell but in fact the comments are indicating to the student that they may be eligible for Pell.--??	Raymond Gurrola	<u>10/23/08 FSA Meeting</u> : No change	
118	General	1) Why does question 55 have an age limitation of 13? Someone whose parents died when they were 9 would have to answer "No" which doesn't seem right. 2) Question 27 should have an accompanied question (a question 28) that asks if the student will have a bachelor's degree before June 29th to at least create a comment code to enter in the ISIR so that schools can easily catch those students who graduate in... let's say December and then transfer to another school that may not require transcripts such as community college or technical schools. Otherwise how would a school know not to pay a student Pell in this situation? Thanks.	Raymond Gurrola	<u>10/23/08 FSA Meeting</u> : No change	
119	General	Comments provided in PDF. Response drafted for Secretary's approval	Jill Hunter-Williams on behalf of 53 Members of Congress	<u>10/23/08 FSA Meeting</u> : Resonse being drafted for Secretary's signature <u>11/17/08 FSA/OPE Meeting</u> : No change	
120	General	I had a question that I was hoping someone will answer. I heard that if you want to receive financial aid and you are a male you have to sign something that said you will be drafted or else you cannot receive any financial aid. Is that true?	Michelle Gonzalez	<u>11/17/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
121	General	The National Association for the Education of Homeless Children and Youth (NAEHCY) and the National Law Center on Homelessness & Poverty (NLCHP) are pleased to submit these comments on the 2009-2010 Free Application for Federal Student Aid (FAFSA) in response to the notice of invitation for public comment issued in the Federal Register on Thursday, August 28, 2008. Each year, between 1.6 and 1.7 million youth run away from home or are forced to leave their home by parents. Generally, youth leave home due to severe dysfunction in their families, including circumstances that put their safety and well-being at grave risk. Unfortunately, physical and sexual abuse in the home is common; studies of unaccompanied youth have found that 20 to 50% were sexually abused in their homes, while 40 to 60% were physically abused. Parental drug use or alcoholism and conflicts with stepparents or partners also provoke youth to run away from home. In a survey of unaccompanied youth in California, over half felt that being homeless was as safe as or safer than being at home. These youth live in a variety of temporary situations, including shelters, the homes of others, cars, campgrounds, public parks, abandoned	Eric Tars on behalf of National Association for the Education of Homeless Children & Youth and the National Law Center on Homelessness & Poverty	<u>11/17/08 FSA/OPE Meeting</u> : No change	
122		On behalf of Texas Guaranteed (TG), I am pleased to provide a response to the August 28, 2008, request for comments regarding the Free Application for Federal Student Aid (FAFSA) that the Secretary proposes to use for the 2009-2010 award year. TG appreciates the opportunity to comment on this draft application. Please contact me directly if you have any questions regarding the attached comments. To Whom It May Concern. On behalf of Texas Guaranteed (TG), I am pleased to provide a response to the August 28, 2008, request for comments regarding the Free Application for Federal Student Aid (FAFSA) that the Secretary proposes to use for the 2009-2010 award year. TG supports and participated in creating the response from the National Counsel of Higher Education Loan Programs (NCHELP) that was submitted to this 60-day information collection request. In addition, we offer the following detailed comments which focus on making the form easier to understand and use: 1. On page 2, top left, "Notes for questions 14 & 15:" the paragraph ends with a statement for non-citizens who are ineligible for federal student aid: "...However you may be eligible for state aid." It would be helpful if the instructions did not end abruptly. To assist applicants, we suggest adding "Please see your school's financial aid office to determine if any state aid options are available." 2. On page 2, "Notes for question 32:" We suggest providing	Laura Kowalski on behalf of Texas Guaranteed (TG)	<u>11/17/08 FSA/OPE Meeting</u> : Make comments 'singular' tense; Reverse first and second bullets in the Notes	

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123	General	Attached are comments from NASFAA. Thank you! To Whom it May Concern. On behalf of the nearly 3,000 member institutions of the National Association of Student Financial Aid Administrators (NASFAA), I am writing to offer our comments on the draft 2009-10 Free Application for Federal Student Aid (FAFSA). We appreciate the Department's continued efforts to clarify and improve the FAFSA structure and language. In particular, we are pleased to see that the former Worksheets B and C have been eliminated and those questions incorporated into the application. We also support the inclusion of the answer choices for Questions 28-31 into the application rather than the separate Notes section. We commend the Department's efforts to incorporate the changes required to satisfy the intent of Congress in implementing the College Cost Reduction and Access Act (CCRAA). We have some general comments on these changes, specifically the changes to the dependency status questions. (For full comments see 'Comments Listing' document)	Karen McCarthy on behalf of NASFAA	<u>11/17/08 FSA/OPE Meeting</u> : Accept second suggestion under 'Notes for question 52' for wording "...for state or training purposes"; Place on the 2010-2011 FAFSA RTS the suggestion under 'Instructions for Q39'; Place on the 2010-2011 FAFSA RTS the suggestion under 'Instructions for 77-81 (also instructions for 98-102 on page 10). No change for all other suggestions from NASFAA	

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124	General	<p>Good evening. On behalf of NCHELP, thank you for the opportunity to provide the attached comments on the draft 2009/10 FAFSA. To Whom It May Concern. Thank you for providing the financial aid community with the opportunity to review and comment on the draft of the 2009-2010 Free Application for Federal Student Aid (FAFSA). On behalf of the National Council of Higher Education Loan Programs (NCHELP), we offer the following comments in response to Federal Register Notice dated August 28, 2008. NCHELP is an organization representing federal student loan guarantors, secondary markets, lenders, loan servicers, collection agencies, as well as some institutions of higher education. In addition to participating in the Federal Family Education Loan (FFEL) Program, many of our guarantor members administer state grant and scholarship programs and state savings programs, both of which extend their interest in commenting on the FAFSA. NCHELP appreciates the summary of changes that was provided by the U.S. Department of Education. (For full comments see 'Comments Listing' document)</p>	Vicki Shipley on behalf of NCHELP	<u>11/17/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
125	General	<p>Dear U.S. Department of Education. Comments on new FAFSA changes. I am an employee of a drop-in shelter for homeless youth in Los Angeles CA. Some concerns I have for the recent changes are as follows:</p> <ol style="list-style-type: none"> <li>1. The limit placed on the age of "Youth" in the notes category for questions 58-60 <ol style="list-style-type: none"> <li>a. We interact with youth that are homeless between the ages of 12-24</li> <li>b. In the description currently given "Youth" "means you are 21 years of age or younger or you are still enrolled in high school as of the day you sign this application" this description should be expanded to include homeless youth ages 22 and 23.</li> <li>c. These homeless youth should not be excluded from the benefits of these changes simply because they are to old.</li> </ol> </li> <li>2. Will homeless organizations that do not receive government funding qualify as a "basic center or transitional living program" as specified in question 60?</li> </ol> <p>Thank you for your time and consideration of our comments,  Jay Christian, Transformative Education, 5850 Hollywood Blvd.  Los Angeles, CA 90028. <a href="http://www.myfriendsplace.org">www.myfriendsplace.org</a></p>	Jay Christian	<u>11/17/08 FSA/OPE Meeting</u> : No change	



Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
126	General	<p>Comments on FAFSA Form and Instructions. Below please find commentary on questions 8, 14, and 15 of the FAFSA form. We found that these areas of the FAFSA form and their accompanying Instructions can be improved to more clearly identify non-citizens eligible for postsecondary educational financial aid. Our goal in these comments is to suggest improvements that will help assure that the FAFSA form instructions provide direction that will assist both applicants and institutions in identifying each of the groups of non-citizens eligible to receive postsecondary educational grants and loans. Please refer to the discussion of each question below and proposed language. We have tried to be as thorough as possible. However, if the Department of Education would like us to clarify or amplify any information we provide in these comments we would be happy to answer questions and provide any further information that would be of assistance to the Department. Our contact information is listed at the bottom of these comments. (For full comments see 'Comments Lisiting' document)</p>	Leslye Orloff on behalf of Legal Momentum	<u>11/17/08 FSA/OPE Meeting</u> : No change	

Comment Number	FAFSA Number	Comment	Source	Meeting Notes	Resolution
127	General	<p>To Whom It May Concern. The National Immigration Law Center (NILC) and the Legal Aid Foundation of Los Angeles (LAFLA) are submitting these comments in response to the notice published in the Federal Register on August 28, 2008 (73 Fed. Reg. 50785), soliciting input on the Free Application for Federal Student Aid (FAFSA) for the 2009-2010 award year. Our comments focus on the questions and instructions regarding eligible non-citizens, and the submission of Social Security Numbers by these applicants. NILC is a nonpartisan national legal advocacy organization that works to protect and promote the rights of low-income immigrants and their family members. Since its inception in 1979, NILC has earned a national reputation as a leading expert on immigration law and the employment and public benefit rights of low-income immigrants. NILC conducts policy analysis, advocacy, and impact litigation, provides training, publications, and offers technical assistance to a broad range of groups throughout the United States. (For full comments see 'Comments Listing' document)</p>	<p>Sheila Neville on behalf of National Immigration Law Center (NILC) and the Legal Aid Foundation of Los Angeles (LAFLA)</p>	<p><u>11/17/08 FSA/OPE Meeting</u>: No change</p>	

