

## 2013-2014 Federal Student Aid Application Comments Tracking Summary

	Comment	Status	Resolution
1)	<p>It would be great if high school graduation date could be added to the FAFSA.</p> <p>We currently monitor and report to high schools the percentage of their seniors who have completed the FAFSA. Currently we know that our data is not 100% accurate because we don't know for sure which of the student from their high school are truly seniors (versus students who graduated and took a year off, for example). We use date of birth to help narrow down the group, but that is not accurate as seniors can be anywhere from 17 years of age to 19 or even 20 years of age. With this additional field, high schools could have much more accurate information and focus their FAFSA completion efforts on those who have not yet completed the FAFSA.</p>	<p>Resolved No Change</p>	<p>The High School graduation date field is not required for federal student aid eligibility determination.</p>
2)	<p>13-14 FAFSA on the Web Application: a) "Recently Filed Taxes" section - can this be a more specific period of time such as "Recently filed taxes within the last week" or something? And for the "None of the Above" option, potentially change to: "None of the Above or Filed Electronically at least 2 weeks ago and filed by mail at least 8 weeks ago"? Many students misunderstand the questions / the vagueness of the time period, so they are reluctant to choose None of the Above and the IRS DRT option is then skipped for them!</p> <p>b) Electronic Signatures: Electronically signing the FAFSA - not obvious to students to enter the PIN and then click on the Sign button; find a way to clarify this please.</p> <p>c) Number the questions on the FAFSA on the Web</p> <p>d) Lock out the Assets field after an amount has been entered and ask them to call FA office to make the change.</p>	<p>a) Resolved</p> <p>b) Resolved</p> <p>c) Resolved No Change</p> <p>d) Resolved No Change</p>	<p>a) An enhancement to the 2013-2014 FAFSA on the Web will address the "Recently Filed Taxes" and "None of the Above" comments by simplifying and clarifying the IRS Data Retrieval Tool logic.</p> <p>b) An enhancement to the 2013-2014 FAFSA on the Web will clarify the logic for the electronic signature process.</p> <p>c) The question numbers on the paper FAFSA are referenced in the help topics, the Help and Hints, and the application summary report (viewable from any page within the application) on FAFSA on the Web. The actual question</p>

			<p>numbers are not presented by each question within FAFSA on the Web for two reasons: 1) questions in FAFSA on the Web do not display in the same order as questions on the paper FAFSA due to Web logic that allows for a customized experience, and 2) this customized experience in FAFSA on the Web results in the suppression of certain questions. Because of the customized experience in FAFSA on the Web, the Department believes that the inclusion of question numbers on screen would cause confusion.</p> <p>d) The asset questions in FAFSA on the Web correction entry specifically ask for asset amounts on the day the application was submitted. Because the answer should be corrected if a true mistake was made, The Department needs to allow applicants to make necessary corrections.</p>
3)	<p>I work in a Federal TRiO program Educational Talent Search and yearly assist my students in both the submission of the FAFSA as well as in understanding the output the SAR</p> <p>The submission of the FAFSA is not at all difficult and in fact quit simple even for students who are not comfortable with or knowledgeable about numbers associated with wages salaries and other forms of income</p> <p>The issue comes after submission when at least in years past almost 50 % or more of my low income first generation population are selected for a process called VERIFICATION This is critical because without completing the verification process Financial Aid cannot be awarded and in many cases</p>	Resolved No Change	<p>The text that is currently displayed states the following:</p> <p>“Your FAFSA has been selected for a review process called verification. Your school has the authority to request copies of certain financial documents from you and your parent(s).”</p> <p>Since the verification process varies from school to school, FAFSA on the Web does not offer individual guidance about next steps.</p>

	<p>colleges will not make an offer of Financial Aid until it is completed yet they still expect students to pay deposits by May 1st</p> <p>When we go and look @ their SARs the while not always aware of what the EFC means and almost never aware that they have been selected for verification</p> <p>Why well let's see , The instructions are not bolded , the asterisk is not well explained and the process says to contact your FAA</p> <p>So why should I contact the Federal Aviation Administration, FAA which is what you get if you Google FAA. Why not clearly and in BOLD say that you need to contact the office of Financial Aid at the institution that you plan to attend</p> <p>Verification should be in Bold and should be explained as in both the reason why you were selected and exactly what to do next step by step</p> <p>I realize that there are many components to the whole FA process but from the perspective of a practitioner who works with a low income population and also assists other High School counselors in the 6 High Schools I work in I rural NH VERIFICATION , remains the least understood and most obscure part of the entire process</p>		
4)	<p>a) Recommendation for greater emphasis on the Department's need for use of the IRS Retrieval Tool.</p> <p>b) Also we need the FAFSA workshop materials during January of the FAFSA filing year. Early submission is required by many colleges by February 15. Training cannot be conducted because training materials become available much later.</p>	<p>a) Resolved</p> <p>b) Resolved No Change</p>	<p>a) Messaging will be added to FAFSA on the Web for 2013-2014 to strongly encourage those applicants who estimate their financial information to return later and utilize the IRS Data Retrieval Tool.</p> <p>b) Ongoing training opportunities are announced on the Information for Financial Aid Professionals (IFAP) web site. The FAFSA on the Web demo site for the next cycle is available in late December.</p>

			A PDF of the application is available to the public in early January via FAFSA on the Web when the application is deployed.
5)	<p>On the front page of the draft students are advised if their family has unusual circumstances that may affect their financial situation – such a loss of employment - they are to complete the form as instructed, then contact the Financial Aid office of the school they are planning to attend. When they come in here with a similar scenario we tell them that there isn't anything we can do. We do not offer PJ we wait for them to ask about PJ. This may appear to them as conflicting information.</p> <p>On page 9 it is noted that under VERY limited circumstances a student may be able to submit the FAFSA without parental information. It does not indicate if that FAFSA will eventually be accepted.</p>	Resolved No Change	<p>The intent of the text is to encourage all applicants to submit the application even if they think their personal situation would hinder the process. Additionally, students need to know who to contact about unusual circumstances. It is then up to the school to determine whether or not to use professional judgment.</p> <p>Regarding the note on page 9, more details are provided on FAFSA on the Web.</p>
6)	<p>I would like to suggest a change to the wording of FAFSA question 28:</p> <p>Current: "Will you have your first bachelor's degree before July 1, 2013?"</p> <p>Suggested: "Will you have completed your first bachelor's degree before July 1, 2013?"</p> <p>For some reason, many students mistakenly answer "Yes" to this question as it is currently worded, which results in delays in their financial aid processing.</p>	Resolved No Change	
7)	<p>It would be extremely helpful for our institution (and am sure many others) to have these 2 questions ADDED back to the FAFSA:</p> <p>a) Expected enrollment – this is VERY helpful for packaging aid at</p>	Resolved No Change	<p>a) For the 2011-2012 cycle the enrollment status question was deleted. The rationale for the change is that at the point in which a student is applying for aid, students have indicated that they do not know what their</p>

<p>correct status (keeping from having to have extensive changes to those packaged at incorrect status eg. If all packaged FT).</p> <p>b) If a student wants a student loan – this is VERY helpful in not having to package all students with loans/or not packaging and then having to make students complete additional paperwork to request a student loan. I believe this can assist with possibly lowering the default rate for schools who may have been packaging loans and students accepting without thinking about wanting/needing one.</p>	<p>enrollment status will be and often do not understand the enrollment status terms that may vary from college to college, and therefore end up reporting an incorrect enrollment status. Additionally, the administration believes students may be able to make better decisions about college affordability if they are able to see the full amount of aid they would be able to receive. The Department encourages schools to review their administrative processes to account for the elimination of this question and to understand how they can gather a more accurate enrollment status for the student.</p> <p>b) For 2011-2012, question 31 was revised to capture an applicant's interest in work-study instead of work-study and loans. The rationale for the change is that at the point in which students are applying for aid, they often do not know whether they will need student loans to help pay for college. The Department believes that the more appropriate point for students to determine whether they will need student loans would be when they are reviewing the award packages developed by the financial aid office. Students and their families can then discuss their student loan options based on having information about all of the aid they have been offered. The Department will continue to ask about work-study interest because of its limited availability at colleges, and encourages schools to review their administrative processes to account for the changes to the question.</p>
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<p><b>8)</b></p>	<p>Would you consider adding two additional options to FAFSA item numbers 33 and 80?</p> <p>Currently, the FAFSA give choices of:</p> <ul style="list-style-type: none"> <li>1040</li> <li>1040A/EZ</li> <li>A foreign tax return</li> <li>A tax return from Puerto Rico, another U.S. territory, or Freely Associated State.</li> </ul> <p>I propose adding options thus:</p> <ul style="list-style-type: none"> <li>Form 4868 - Extension</li> <li>1040X - Amended return</li> </ul> <p>My reasoning is that many folks know that they are doing this upfront or relatively early in the tax season, and it would help FA offices determine better what documents we should be looking to receive, especially in light of the requirements to get IRS Tax Return Transcripts and Tax Account Statements/Summaries.</p> <p>If not perhaps it could be a separate item?</p>	<p>Resolved No Change</p>	<p>The current income tax return choices are used for the simplified needs test and automatic zero Expected Family Contribution (EFC) determination. Adding extension or amended tax return choices does not assist students who file the FAFSA early since it is difficult to predict an extension or an amended tax return.</p>
<p><b>9)</b></p>	<p>In addition to the AGI, tax paid, etc. posted to the FAFSA, how about if the IRS posts which type of tax return they have on file for the student/parent and whether the student/parent were eligible to file a 1040 A/EZ rather than asking the student parent to self-report these two items?</p> <p>It is my experience that it is often wrong and can result in a large EFC change when corrected. Students not getting Pell grants may get it, and students who may initially be awarded Pell may</p>	<p>Resolved No Change</p>	<p>The IRS Data Retrieval Tool transfer does provide tax return type; however, the question that asks if an applicant is eligible to file a 1040A/EZ is not a tax return field. Therefore, it cannot be retrieved from the IRS.</p>

	lose it.		
10)	<p>Question #29 on the FAFSA asks, “When you begin the 2013-2014 school year, what will be your grade level?” We have found over the years that numerous students answer this incorrectly by choosing the response of “Continuing graduate/professional student.” They take it to mean that they are continuing their education after having graduated from high school or are returning to school after having worked in a professional setting. The result is that they are assumed to have a Bachelor’s Degree and therefore flagged as ineligible for Pell Grant funds. This requires follow-up so that we can determine if they have in fact completed their Bachelor’s Degree or if they need to make a correction to their answer. It adds processing time and results in frustration for students.</p> <p>We would like to see this response reworded or modified to prevent such confusion. An explanation in the Helpful Hints section of FAFSA on the Web often times does not suffice, as students do not take the time to read those tips. Perhaps the following could be considered as options:</p> <ul style="list-style-type: none"> <li>• Continuing graduate/professional or beyond (i.e. Master’s/Doctorate)</li> <li>• Pursuing Master’s/Doctorate/Professional Degree</li> <li>• Pursuing (advanced) degree beyond Bachelor’s</li> </ul>	Resolved No Change	The stated categories were defined and implemented in conjunction with state entities to facilitate the determination of eligibility for state grant programs.
11)	Georgia Southern University would greatly appreciate having the 'are you interested in a loan' question added back to the FAFSA.	Resolved Duplicate	Refer to Comment #7
12)		a)	a) The application describes the rules according

	<p>On behalf of Boston University, I am submitting the following comments regarding the 13/14 Draft FAFSA. As a QA school, BU has reviewed a broad range of FAFSA filers to analyze which fields are most commonly misreported. We believe these suggestions may improve the accuracy of students' and parents' responses to these questions.</p> <p><u>a) Payments to tax-deferred pension and savings plans (Q. 44a, 92a):</u> Our QA analysis confirms this field is likely the most commonly misreported item on the FAFSA and we believe it is because families do not understand the question. Many families do not consider their contributions to retirement plans as payments to “pension and savings plans”; therefore, they report “zero” on the FAFSA but we often verify a contribution as indicated on W-2 forms in Box 12a – 12d. We suggest changing the language to include the word “retirement” which will help families better understand the question.</p> <ul style="list-style-type: none"> <li>o Suggested Text: “Payments to tax-deferred retirement, pension and savings plans (paid directly or withheld from earnings), including, but not limited to, amounts reported on the W-2 forms in Boxes 12a through 12d, codes D, E, F, G, H, and S.”</li> </ul> <p><u>b) Net Worth of Investments, including Real Estate (Q. 41, 89):</u> When a portion of the primary home is being rented, the FAFSA does not instruct the family to report that portion of their home as “other real estate.” We suggest adding language to the “notes” on the FAFSA, page 2 for parents and students to include the rental portion of their home in the net worth of investments.</p>	<p>Resolved Forwarded to appropriate business unit</p> <p>b) Resolved Forwarded to appropriate business unit</p> <p>c) Resolved No Change</p> <p>d) Resolved Forwarded to appropriate business unit</p> <p>e) Resolved Forwarded to appropriate business unit</p>	<p>to the current Higher Education Act (HEA) The comment has been forwarded to the appropriate business unit that reviews policy recommendations.</p> <p>b) The application describes the rules according to the current HEA. The comment has been forwarded to the appropriate business unit that reviews policy recommendations.</p> <p>c) The Department believes the current language provides adequate guidance.</p> <p>d) The application describes the rules according to the current HEA. The comment has been forwarded to the appropriate business unit that reviews policy recommendations.</p> <p>e) The application describes the rules according to the current HEA. The comment has been forwarded to the appropriate business unit that reviews policy recommendations.</p>
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<p><u>c) Net Worth of Businesses and/or Investment Farms (Q. 42, 90):</u> We commonly find families incorrectly include the net worth of their family-owned business and/or family-owned farm on the FAFSA. The “notes” on the FAFSA, page 2 clarify when to include or exclude the business/farm; however, we suspect that families are not referring to the special instructions. The current question specifies “don’t include a family farm or family business with 100 or fewer full-time or full-time equivalent employees.” We suggest adding more specific language to this question for parents and students to clarify the definition of “family-owned.”</p> <ul style="list-style-type: none"> <li>o Suggested Text: “As of today, what is the net worth of your parents’ (or students’/spouses’) current businesses and/or investment farms? Don’t include a farm or business that is more than 50% owned and controlled by the family, and has 100 or fewer full-time or full-time equivalent employees. See Notes page 2.”</li> </ul> <p><u>d) Health Savings Accounts (HSAs) (Q. 44i, 92i):</u> per the 12/13 Application and Verification Guide, HSAs are to be treated as untaxed income. However, the FAFSA does not instruct students and parents to include tax-free contributions to an HSA as untaxed income. We suggest adding language to both students and parents “other untaxed income” questions that tax-free HSA contributions should be included as untaxed income.</p> <p><u>e) Homebuyer Tax Credit (Q. 44i, 92i):</u> it is our understanding that the first-time homebuyer tax credit expired after the 2011 tax year. However, the FAFSA question for “other untaxed income” instructs both students and parents to include the first-time homebuyer credit as</p>	<p>f) Resolved No Change</p>	
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	<p>untaxed income. We suggest removing these instructions if the tax credit has expired.</p> <p>f) <u>First Bachelor's Degree before July, 1, 2013 (Q. 28)</u>: Many of our undergraduate continuing students mistakenly respond "yes" to this question. We suggest formatting this question similar to how the illegal drug conviction question (Q. 23) is formatted, whereby the "no" response displays before the "yes" response. Perhaps reversing the order of the responses will reduce the number of incorrect responses.</p>		
13)	<p>Among the most common and frequent FAFSA error/omission we observe is that of Untaxed Income, specifically "payments to tax-deferred pension and savings plans". I think the core of the problem is that the instructions for what should be reported only appear if the student or parent checks the box.</p> <p>I suggest that you list the most common type and where to find it, such as "contributions to 401(k) - See box 12 on your W-2", under the question for the filer to see <i>without having to check the box first</i>.</p>	Resolved No Change	Instructions are provided on the paper application and in FAFSA on the Web. A response to this question may also be available through use of the IRS Data Retrieval Tool.
14)	<p>I have a suggestion for the 13-14 FAFSA. The 12-13 process of the IRS data retrieval makes verification to be very quick with less corrections. Thank you, it has really simplified the verification process. However, after experiencing the process of performing the other components of verification I have a bit of an uneasy feeling when the parent or student report their marital status as unmarried but discover after verifying household size that they are married. How would I know that the IRS data retrieval that was transferred to the FAFSA was for one or two people. Is it possible to add the question on the FAFSA what was the "filing status on the 1040". ie: single, married, head of household. This way we would be able to</p>	Resolved No Change	The question recommended is not required to calculate the Expected Family Contribution (EFC). Marital status questions 16 and 58 are used to determine the EFC.

	<p>know for sure that the data transferred is for all family members. Also this could be a red flag for verification when the filing status does not match the reported marital status.</p>		
15)	<p>It would be nice if tax filing status could be drawn done from the IRS. Such as Head of Household, Married filing jointly, single etc...</p> <p>It is hard to tell sometimes when screening for this issue in the verification process when the student has utilized the IRS match.</p>	Resolved Duplicate	Refer to Comment #14.
16)	<p>We are a community college with a large immigrant population. People completing the FAFSA often misinterpret the questions asking for high school completion status and “Will you have your first bachelor’s degree before July 1, 20xx” to mean a only US high school or US college and do not answer the question correctly. We often find students who graduated from schools in other countries answering “NO” to these questions because of that misinterpretation. Since both of these elements affect student eligibility, this misinterpretation has serious consequences for many students. We are requesting that these two items be amended to add “in the US or any other country” to clarify the question for students who attended school outside of the US.</p>	Resolved Duplicate	The comment has been forwarded to the appropriate business unit that reviews policy recommendations.
17)	<p>My suggestion is that the IRS data retrieval has been a great benefit to both the student/parent and financial aid administrator. I have seen ISIR’s where the IRS data retrieval was done but there were “0” wages reported. There is no way for me to verify that they had earnings. Not reporting wages is a disadvantage to the students financial aid eligibility. If it possible</p>	Resolved No Change	The information retrieved from the IRS does not include W-2 information. Since joint tax return filers add wages together and report the sum on their tax return, FAFSA on the Web is unable to separate student/spouse or mother/father income earned from work for eligibility

	to have the IRS data retrieval process to include wages? This is a line item on the IRS transcript, I am sure it would be a retrievable item for the FAFSA.		determination. However, The Department is exploring options to address this issue.
<b>18)</b>	<p>On behalf of the more than 3,000 member institutions of the National Association of Student Financial Aid Administrators (NASFAA), I am writing to offer our comments on the draft 2013-14 Free Application for Federal Student Aid (FAFSA).</p> <p>a) We appreciate the Department’s continued efforts to clarify and improve the FAFSA structure and language, however we believe that the Department would receive much more useful feedback from the community if it instituted a similar comment process with a similar timeframe for the FAFSA on the Web (FOTW), since the vast majority of applicants use FOTW rather than the paper FAFSA.</p> <p>Generally, the FOTW demonstration site (<a href="http://www.fafsademo.ed.gov">www.fafsademo.ed.gov</a>) for the upcoming cycle is not available until mid-December. This late time frame makes it difficult for the financial aid community to provide useful feedback in time for ED to make any necessary or desired changes prior to the January 1 start-up date. In future years, we ask that you make the demonstration site available to the community for comment at or near the same time you are soliciting comments on the paper FAFSA.</p> <p>b) Of particular concern this year are the complexities facing members of the lesbian, gay, bisexual and transgender (LGBT) community. Because of their family structures, completing the FAFSA can be particularly difficult for this community. For example, under the Defense of Marriage Act (DOMA), same-sex marriages are not considered marriages for federal purposes,</p>	<p>a) Resolved No Change</p> <p>b) Resolved No Change</p> <p>c) Resolved Forwarded to appropriate business unit</p>	<p>a) Availability of the FOTW demonstration site is the same as availability of the “official” FAFSA on the Web site.</p> <p>b) The application describes the rules according to the current HEA. For the purposes of federal student aid eligibility determination, the definition of “married” is based on the DOMA definition.</p> <p>c) The comment has been forwarded to the appropriate business unit that reviews policy recommendations</p>

<p>including the FAFSA. Because there are no corresponding instructions to the “Are you married?” question on the FAFSA, a student in a same-sex marriage could reasonably answer “Yes” to that question. Lacking further instruction, that student could also reasonably include his or her same-sex spouse’s information throughout the rest of the FAFSA. We recommend that you add instructions to assist these students and their families in completing their FAFSAs in accordance with federal law.</p> <p>c) If you are an eligible noncitizen, write in your eight- or nine-digit Alien Registration Number. Generally, you are an eligible noncitizen if you are (1) a permanent U.S. resident with a Permanent Resident Card (I-551); (2) a conditional permanent resident with a Conditional Resident Alien Green Card (I-551C); (3) the holder of an Arrival-Departure Record (I-94) from the Department of Homeland Security showing any one of the following designations: “Refugee,” “Asylum Granted,” “Parolee” (I-94 confirms that you were paroled for a minimum of one year and status has not expired), T-Visa holder (T-1, T-2, T-3, etc.) or “Cuban-Haitian Entrant;” or (4) the holder of a valid certification or eligibility letter from the Department of Health and Human Services showing a designation of “Victim of human trafficking.”</p> <p>If you are in the U.S. on an F1 or F2 student visa, a J1 or J2 exchange visitor visa, or a G series visa (pertaining to international organizations), select “No, I am not a citizen or eligible noncitizen.” You will not be eligible for federal student aid; however, you should still complete the application because you may be eligible for state or college aid.</p> <p>The instructions should be consistent in using the official</p>		
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	<p>terminology for these documents, rather than colloquial terms.</p> <p>Although these instructions have been improved over the past several years, we have a continued concern that they are still not complete. Battered immigrants are not included in this list at all, yet ED has issued a Dear Colleague Letter, GEN-10-07, and the FSA Handbook includes several pages explaining how to document the eligible noncitizen status of these students. Page 1-27 of the 2012-13 FSA Handbook states that battered immigrants “indicate on the FAFSA that they are eligible non-citizens...”. It is not clear to us how they would know to do that, based on the current FAFSA instructions.</p>		
<p><b>19)</b></p>	<p>a) Prohibit submission of the FAFSA if the student signature is missing or the parent signature is missing (for dependent students).</p> <p>b) For FOTW, perform a check of the Name/DOB/SSN combination entered against the Social Security Administration’s database and prohibit submission if SSA confirmation fails.</p> <p>c) Crosscheck the state listed in the mailing address and the state identified in the residency question. If they do not match give the student a pop-up warning message to have the student double check their information and confirm its accuracy to override the warning message.</p> <p>Rationale: There are large numbers of students who are denied state aid due to a missing signature or social security number issues. There are many inconsistencies between the student’s mailing address and the listed state of residence which requires the states to either deny aid or spend additional time tracking down the student to confirm residency.</p>	<p>a) Resolved</p> <p>b) Resolved No Change</p> <p>c) Resolved No Change</p> <p>d) Resolved No Change</p> <p>e) Resolved No Change</p>	<p>a) Beginning in 2013-2014, FAFSA on the Web will more strongly encourage electronic signatures. However, not every person has the ability to sign the application electronically, so the Department has to provide an option for those applicants to sign as well.</p> <p>b) Federal Student Aid and the Social Security Administration do not currently have real-time match capabilities.</p>

	<p>d) Build in a calculator for FOTW to estimate taxes paid.</p> <p>Rationale: It would be helpful to provide a calculator/tool that calculates an estimate for “taxes paid” for the applicants who have not yet completed their tax returns when filing their FAFSA. There is a worksheet that “pops up” to add up the items for a total AGI estimate, but there is not help available to estimate taxes paid. Applicants too often then just add up taxes withheld from the W-2 form and use that as an estimate of taxes paid.</p> <p>e) Provide information advising students of the “processing time” between e-filing income tax returns and when that information is accessible to interface with the FAFSA application.</p> <p>Rationale: The instructions on interfacing with the IRS are unclear. Although students now have an option to skip that feature, perhaps a required date field could be added, noting the date the tax return was processed. If that date is within the required IRS processing time period, the system would then provide an option to interface with the FAFSA. At a minimum, information advising customers of the “processing time” between e-filing income tax returns and when that information is accessible to interface with the FAFSA application would be helpful.</p>		
20)	<p>During the FOTW-renewal process, a student is prompted to review the existing information from previous years. When the student gets to question “What will be your high school completion status?” It does not allow students to populate the high school name, city, state and code. With one of the new verification items for the 2013-2014 award year being the High School Completion Status, this may cause many students to be</p>	Resolved	<p>The 2013-2014 FAFSA on the Web will require all applicants who indicate they have or will have a high school diploma to provide the name, city and state of the high school. If the applicant is renewal-eligible and has not answered the question before, he or she will be prompted to answer the question on his or her</p>

	pulled for verification.		renewal application.
21)	I often help students fill out their FAFSA on the website and I have noticed that when students are asked the question about whether they have filed taxes there is some confusion. They often will check off that they “Recently Filed” rather than “Already Filed” but they have no idea that checking such an option will take them out of the running for doing the IRS Retrieval. Could we change this option to, “Recently Filed (in the past 2 weeks)” instead? Also, the very next question on the FAFSA needs to be answered as “None of the Above” or else the IRS Retrieval will not be available either. These two roadblocks make it so much more confusing than it needs to be. Certainly, we want as many students opting for the IRS Retrieval as possible!!!	Resolved Duplicate	Refer to Comment #2.
	Comments 22-56 have been submitted by one organization		
22)	Page 2, Notes, Q22  Need to add language that advises the male applicant he can register by answering this question if he has not done so already.  Insert new sentence #3 as follows:  If you are a male between the ages of 18 and 25 and have not already registered, we will register you if you request.	Resolved No Change	Spacing limitations prevent this inclusion on the paper FAFSA. However, this specific information is currently provided in the Help text in FAFSA on the Web.
23)	Page 3, Q23  Seems to be some discrepant guidance in the drug offense question. Sentence 1 asks if the applicant was convicted of an offense that occurred while he was receiving Title IV aid. Alternatively, sentence 2 tells the applicant to answer “no” if they never had a conviction while you were receiving aid. Student eligibility is based on when the offense occurred, not on when the conviction took place.	Resolved Forwarded to appropriate business unit	The application describes the rules according to the current HEA. The comment has been forwarded to the appropriate business unit that reviews policy recommendations.



	<p>Update Sentence 2 as follows:</p> <p>Answer “No” if you have never received federal student aid or if you have never had a drug conviction for an offense that occurred while receiving federal student aid.</p>		
24)	<p>Page 4, Instructions, Q38 &amp; 39 (and Q86 &amp; 87)</p> <p>This section now says for wages: “...may be on the W-2 forms (Box 5)...”</p> <p>Using Box 5 may yield inaccurate results for the following reasons:</p> <ul style="list-style-type: none"> <li>•Tax filers completing the FAFSA have the option of using either line items from the tax return OR W-2 amounts. Line 7 from the 1040 uses box 1 from the W-2. If we change the instructions to box 5, some applicants may use line 7 (essentially box 1) and others will use box 5.</li> <li>•Box 5 typically is a higher amount because it includes total compensation, including contributions to 401(k) plans. Balances of retirement plans are not counted in the EFC, and thus the contributions to make such balances should be excluded as well.</li> <li>•Box 5 is designated as “Medicare wages” – box 3 is “Social Security wages.”</li> </ul> <p>Update as follows:</p> <p>This information may be on the W-2 forms (Box 1), or on IRS Form 1040 – line 7 + 12 + 18...</p>	Resolved	The Department has decided to remove the reference to Box 5 and return to the 2012- 2013 language that just states W-2’s. The reference to Box 1 may include elective deferrals and for reasons listed in the comment, Box 5 may not be appropriate.
25)	<p>Page 4, Q38 &amp; 39 Page 7, Q86 &amp; 87</p> <p>“If any individual earning item is negative, do not include that</p>	Resolved No Change	The Department believes the current language provides adequate guidance. The text proposed is regarding income, not taxes. The suggested “tax line” language can mislead the applicants.

	<p>item in your calculation.” What individual earning amount is this referencing – the line item or the total? Does that mean if a 1040 has the following amounts:</p> <p>Line 7 = \$400 Line 12 = (\$1000) Line 18 = \$0</p> <p>Would that equal \$0 (because the total earning amount is negative) or \$400 (because line 12 is negative, and thus, excluded)?</p> <p>Replace with the following suggested text, adapted from the sidebar on page AVG-12 in the 12-13 FSA Handbook:</p> <p>“If any individual tax line is negative, do not include that item in your calculation.”</p>		
26)	<p>Page 5, Instructions, Q44i &amp; 92i</p> <p>ED chose not to include line 25 of a 1040 for the HSA deduction (although they do reference the first-time home buyer tax credit.)</p> <p>Insert the following, adapted from the sidebar on page AVG-19 in the 12-13 FSA Handbook:</p> <p>“Also include the tax-free contributions to health savings accounts from IRS Form 1040 – line 25 and first-time homebuyer tax credit from IRS Form 1040—line 67.”</p>	Resolved Duplicate	See Comment #12e.
27)	<p>Page 5, Q43f Page 7, Q91f</p> <p>We should specify that a “cooperative education program” is not</p>	Resolved No Change	The Department believes the current language provides adequate guidance.

	<p>the same as “federal work-study.”</p> <p>Insert the following:</p> <p>Earnings from work under a cooperative education program offered by a college. (Cooperative education programs are not the same as federal work-study positions.)</p>		
<b>28)</b>	<p>Student Aid Report, Page 1, First Checkbox 1</p> <p>Recommend text be added to address using the IRS DRT to make any necessary corrections.</p> <p>Add a new third sentence:</p> <p>If you filed a federal tax return, you should access your FAFSA data online at <a href="http://fafsa.gov">fafsa.gov</a>, and use the IRS Data Retrieval Tool to make the necessary corrections.</p>	Resolved	<p>The Department cannot use the text recommended because it may not apply to all applicants. Some applicants who receive this comment have already used the IRS DRT, while others aren’t eligible to use it for various reasons. However, messaging will be added to FAFSA on the Web for 2013-2014 to strongly encourage those applicants who estimate their financial information to return later and utilize the IRS Data Retrieval Tool.</p>
<b>29)</b>	<p>Student Aid Report, Page 1, Second Checkbox 1</p> <p>A 0 EFC should equate to a Pell Grant of \$5550, not the \$5350 as stated on the SAR. Also, not all colleges offer other grants, loans or work-study.</p> <p>Suggest the following:</p> <p>Based on your EFC it appears that you may be eligible for a Federal Pell Grant of up to \$5550, in addition to other grants, low-interest student loans, and work-study opportunities that may be available.</p>	Resolved No Change	<p>The Pell Grant amount currently displayed is a place holder. The correct amount will display on Pell-eligible SARs.</p>
<b>30)</b>	<p>Student Aid Report, Page 3, Checkbox 2</p> <p>Also need to note the IRS DRT process for making corrections.</p>	Resolved No Change	<p>Refer to Comment #28.</p>

	<p>Add a new third sentence:</p> <p>If you filed a federal tax return, you should use the IRS Data Retrieval Tool to make the necessary corrections.</p>		
31)	<p>Student Aid Report, Page 7, Instructions, Q38 &amp; 39</p> <p>The instructions don't match the FAFSA. Need to determine which instructions are more accurate and make them match.</p> <p>Insert the following at the end of the instructions:</p> <p>"If any individual tax line is negative, do not include that item in your calculation."</p>	Resolved No Change	Refer to Comment #25.
32)	<p>Student Aid Report, Page 10V and 10Q</p> <p>It is unclear which page 10 students will receive in the SAR and whether the text on the bottom half of these different versions need to match. Therefore, we propose the following options (32a and 32b) to ensure the signature block is complete, accurate and clear.</p> <p>a) Should this match the statement of educational purpose on the FAFSA? Need to determine which one is more accurate and make them match. Substitute existing text with the following:</p> <p>By signing this application, you certify that you (1) will use federal and/or state student financial aid only to pay the cost of attending an institution of higher education, (2) are not in default on a federal student loan or have made satisfactory arrangements to repay it, (3) do not owe money back on a federal student grant or have made satisfactory arrangements to repay it, (4) will notify your college if you default on a federal student loan and (5) will not receive a Federal Pell Grant from</p>	Resolved No Change	<p>a) The statement signed on the FAFSA and the statement signed on the SAR are intended to be different. The statement on the FAFSA is prior to submission of the application, while the statement on the SAR is signed after the application has been processed and only if corrections are made. Furthermore, the certification statement on page 10 of the SAR varies depending on whether the application was processed successfully (applicants receive page 10V) or if there are issues with the application that need to be resolved (applicants receive version 10Q).</p> <p>b) The certification statement applies to all students, regardless of whether or not they are selected for verification. Since the text is not specific to those selected for verification and schools have the right to ask for whatever documents they choose when a student isn't</p>

	<p>more than one college for the same period of time.</p> <p>By signing this application I certify that all of the information I provided is true and complete to the best of my knowledge and I agree, if asked, to provide information that will verify the accuracy of my completed form. This information may include U.S. income tax forms that I, or my family, are required to file. Also, I certify that I understand that the Secretary of Education has the authority to verify the information I reported with the Internal Revenue Service and other federal agencies. If I sign any document related to the federal student aid programs electronically using a personal identification number (PIN), I certify that I am the person identified by the PIN and have not disclosed that PIN to anyone else. If I purposely give false or misleading information, I may be fined up to \$20,000, sent to prison, or both.</p> <p>b) Replace the term tax form with tax transcript for accuracy. Schools are permitted to request tax returns only in limited circumstances. If I am asked, I agree to give proof that my information is correct. The proof might include a copy of my 2012 U.S. Income Tax Transcript or my W-2 form(s).</p>		<p>selected (and can ask for more than what's required when a student is selected), the Department prefers to keep the current language.</p>
<p><b>33)</b></p>	<p>Page 1, Applying by the Deadlines, paragraph 3</p> <p>Reword as noted for clarity.</p> <p>Revise as follows:</p> <p>Check with your high school or the financial aid office at your institution about sources of state and college aid and their application deadlines. Be aware that college student aid deadlines may be earlier than state aid deadlines.</p>	<p>Resolved No Change</p>	<p>The Department is evaluating the text suggested.</p> <p>The comment has been forwarded to the appropriate business unit to review recommendations.</p>
<p><b>34)</b></p>	<p>Page 1, Using Your Tax Return, paragraph 1, sentence 2</p>	<p>Resolved</p>	<p>The Department believes the current language</p>

	<p>Completing a return is not the same as filing the return.</p> <p>Revise as follows:</p> <p>If you have not yet filed your tax return, you can complete the FAFSA using estimated information, and correct the FAFSA after you have filed the return.</p>	No Change	provides adequate guidance. "Completion" is the term used because an applicant can use information on a completed tax return even before he or she files the tax return.
35)	<p>Page 2, Notes, Q34 &amp; 81</p> <p>Change "...a person..." to "you" for consistency with other sections.</p> <p>Elimination of duplicative explanation of eligibility to use the 1040A and 1040 EZ tax forms</p> <p>Revise as follows:</p> <p>In general, you are eligible to file a 1040A or 1040 EZ if you make less than \$100,000, do not itemize deductions, do not receive income from your own business or farm, do not receive alimony, and are not required to file Schedule D for capital gains.</p>	Resolved No Change	The Department believes the current language provides adequate guidance. The language used at the beginning is different to explain what the rule is. Once that information is explained, the language shifts to "you" to refer to the applicant.
36)	<p>Page 2, Notes, Q37 &amp; 85</p> <p>Change "...a person..." to "you" for consistency with other sections.</p> <p>Revise as follows:</p> <p>If you filed a 1040EZ, and did not check either box on line 5, you must enter 01 if you are single, or 02 if you are married. If you checked either the "you" or "spouse" box on line 5, use 1040EZ worksheet line F to determine the number of exemptions</p>	Resolved No Change	The Department believes the current language provides adequate guidance.

	(\$3,700 equals one exemption.)		
37)	<p>Page 2, Notes, Q41, 42, 89 &amp; 90, paragraph 3, sentences 2 &amp; 3</p> <p>Investments also include... section. Provide less complicated instructions relative to dependent and independent students.</p> <p>Revise as follows:</p> <p>For an independent student who does not report parental information....</p> <p>For a dependent student who must report parental information...</p>	Resolved No Change	The Department believes the current language provides adequate guidance.
38)	<p>Page 2, Notes, Q48</p> <p>Delete the “s” from “Reserves” in all occurrences in both paragraphs</p> <p>Replace the word “Reserves” with the word “Reserve.”</p>	Resolved	In this section the Department will keep references to “Reserves” and will instead add an “s” to the end of the word “Reserve” in the Q49 section.
39)	<p>Page 2, Notes, Q48</p> <p>Define Armed Forces here since this is the first time the term is addressed on the page.</p> <p>Revise as follows:</p> <p>Answer “Yes” if you are currently serving in the U.S. Armed Forces (Army, Navy, Air Force, Marines or Coast Guard) or are a National Guard or Reserve enlistee called to active duty....</p>	Resolved	The Department will define “Armed Forces” the first time it appears in the Q22 section.
40)	<p>Page 2, Notes, Q49, paragraph 1, last sentence</p> <p>Correct awkward wording.</p>	Resolved No Change	The Department believes the current language is correct and provides adequate guidance.

	<p>Revise as follows:</p> <p>Also answer "Yes" if you will be a veteran by June 30, 2014.</p>		
41)	<p>Page 2, Notes, Q49</p> <p>Combine the last two paragraphs into a single paragraph so as to match the formatting of first paragraph.</p> <p>Revise as follows:</p> <p>Answer "No" (you are not a veteran) if you (1) have never engaged in active duty in the U.S. Armed Forces, (2) are currently an ROTC student or a cadet or midshipman at a service academy, (3) are a National Guard or Reserve enlistee activated only for state or training purposes, or (4) were engaged in active duty in the U.S. Armed Forces but released under dishonorable conditions. Also answer "No" if you are currently serving in the U.S. Armed Forces and will continue to serve through June 30, 2014.</p>	<p>Resolved No Change</p>	
42)	<p>Page 3, Q8</p> <p>Change the "N" in Number to lower case.</p> <p>Your Social Security number</p>	<p>Resolved No Change</p>	
43)	<p>Page 3, Q26</p> <p>The term "school year" confuses applicants and is not defined as either an academic year or an award year</p> <p>Update Sentence 1 as follows:</p> <p>When you attend college in 2013-2014, what will be your high school completion status?</p>	<p>Resolved No Change</p>	<p>The Department believes the current language is correct and provides adequate guidance.</p>



44)	<p>Page 4, Q29</p> <p>Suggest same change as on Q26, noted above.</p> <p>Revise as follows:</p> <p>When you attend college in 2013-2014, what will be your grade level?</p>	Resolved No Change	The Department believes the current language is correct and provides adequate guidance.
45)	<p>Page 4, Q30</p> <p>Suggest same change as on Q26, noted above.</p> <p>Review as follows:</p> <p>When you attend college in 2013-2014, what degree or certificate will you be working on?</p>	Resolved No Change	The Department believes the current language is correct and provides adequate guidance.
46)	<p>Page 5, Instructions, Step Three</p> <p>“Once you answer ‘Yes’ to any...” This makes it sound like if the student gets to one yes, they can skip the rest of the questions.</p> <p>Revise as follows:</p> <p>If you answer “Yes” to any of the questions in this step, skip Step Four and go to Step Five on page 8.</p>	Resolved No Change	The Department believes the current language is correct. Once the student answers “Yes” to one of the dependency questions, the Central Processing System is able to determine the dependency status.
47)	<p>Page 6, Instructions, Q60</p> <p>Change the “N” in Number to lower case. Also change “date of birth” to birth date for simplicity.</p> <p>Revise as follows:</p> <p>What are the Social Security numbers, names and birth dates of the parents reporting information on this form?</p>	Duplicate	Refer to Comment #42.

	If your parent does not have a Social Security number,...		
48)	<p>Page 6, Q 72, Third Bullet</p> <p>For clarity (a) and (b) should be indented under the introductory statement as noted.</p> <p>Revise as follows:  ...your parents' other children if:  - your parents will provide more than half of their support between July 1, 2013 and June 30, 2014, or  - the children could answer "No" to every question in Step Three on page 5 of this...</p>	Resolved No Change	The Department believes the current language is correct. The suggestion reflects a stylistic preference.
49)	<p>Page 6, Instructions, Q74-78</p> <p>Page 8, Instructions, Q95-99</p> <p>Instructions for the federal means-tested benefits questions no longer explain that SNAP is the new name for food stamps; there is no reference to food stamps at all.</p> <p>Revise instructions by adding a new sentence four:</p> <p>Mark all that apply. Answering these questions will not reduce eligibility for student aid or these programs. TANF may have a different name in your parents' state. Also note that SNAP refers to food stamps.</p>	Resolved No Change	The 2012/2013 FAFSA instructions indicated "Supplemental Nutrition Assistance Program (SNAP) is the new name for Food Stamps." For 2013/2014, this text was removed because the name change is no longer new. The program is called Supplemental Nutrition Assistance Program (SNAP).
50)	<p>Page 7, Q88</p> <p>Delete the extra space between Q87 and Q88.</p>	Resolved No Change	The paper FAFSA does not have an extra space between Q87 and Q88. The text aligns with the boxes on the right.
51)	<p>Page 8, Q93</p> <p>Place the spouse on a separate line from the student for clarity.</p>	Resolved No Change	The Department believes the current language is correct. The suggestion reflects a stylistic preference.

	<p>Revise as follows:</p> <p>Include:</p> <ul style="list-style-type: none"> <li>• yourself,</li> <li>• your spouse, if you are not separated, divorced or widowed,</li> <li>• your children, if you will provide more than half of their support between July 1, 2013 and June 30, 2014, and</li> <li>• other people if they now live with you, you provide more than half of their support and you will continue to provide more than half of their support between July 1, 2013 and June 30, 2014.</li> </ul>		
52)	<p>Page 10, Instructions How can I have more colleges...</p> <p>Update to match the enhancements shared by Department staff at the NASFAA conference. Some students may not automatically receive a PIN if they didn't provide a valid email address and will instead have to apply for one. Also, applicants may be confused as to which button to press now at fafsa.gov, since now there will be two.</p> <p>Revise as follows:</p> <p>1. Use the Federal Student Aid PIN and go to FAFSA on the Web at <a href="http://www.fafsa.gov">www.fafsa.gov</a>. Click the "Login" button to log in and then select the "Make FAFSA Corrections" link.</p>	Resolved	The second sentence will be changed to: Click the "Login" button on the home page to log in to FAFSA on the Web, then click "Make FAFSA Corrections."
53)	<p>SAR, Page 1, paragraph 2, sentence 2, Federal Student</p> <p>Amend second sentence to reference the financial aid package.</p> <p>Revise as follows:</p> <p>Your financial aid package may include grants...</p>	Resolved No Change	The Department believes the current language is correct and provides adequate guidance. The text suggested cannot be used because it would change the definition of what is being described.
54)	<p>Page 1, paragraph 3, sentence 3 For more information...</p>	Resolved	The updated link is:

	<p>The link to the website that is currently listed does not work. Replace website link as follows:</p> <p><a href="http://studentaid.ed.gov/resources/loan-grant-fact-sheets">http://studentaid.ed.gov/resources/loan-grant-fact-sheets</a>.</p>		<p><a href="http://StudentAid.gov/aidInfo">StudentAid.gov/aidInfo</a></p>
55)	<p>Page 3, Checkbox 1, sentence 2</p> <p>Revise as noted to provide more accurate guidance.</p> <p>Revise as follows:</p> <p>You must contact the financial aid office at your school to resolve this issue.</p>	<p>Resolved No Change</p>	<p>The Department is evaluating the text suggested. The comment has been forwarded to the appropriate business unit to review recommendations.</p>
56)	<p>Page 4, Summary of Federal Student Loans, paragraph 3, sentence 2</p> <p>Curious as to why ED continues to use the 5% rate when 6.8% would provide a more accurate and realistic picture.</p>	<p>Resolved No Change</p>	<p>The interest rates are based on the legislation. The percentage used in this section is only an example.</p>