

2014-2015 Federal Student Aid Application Comments Tracking Summary

	Comment	Status	Resolution
1)	# 76 on SAR has a misspelled word: received	Resolved.	Question 76 on the paper SAR has been corrected and now reads: 76. Parent received Supplemental Nutrition Assistance Program (SNAP)?
2)	I am adamantly opposed to changing the parental information on the 2014-15 FAFSA. Same sex marriage is not federally recognized. Most states still define marriage as between one man and one woman. Our federal government is discriminating against gay couples and refuses to offer the same fundamental rights that heterosexual couples have. However, now not only are we denying them marriage, but we are also asking them to include their partner's financial information on the FAFSA. Children of same sex couples cannot have both parents listed on their birth certificate, but now we are forcing them to list both parents' information on the FAFSA. We are double hurting these families. In most circumstances (especially for middle class families), this will greatly increase the student's EFC. Until same sex marriage is recognized by the federal government and until they receive the same rights and benefits as all other Americans, I am adamantly opposed to requiring same sex couples who live together to include both parents' income on the FAFSA.	Resolved.	The Department of Education is currently reviewing the recent Supreme Court decision on the Defense of Marriage Act and the scope of its impact on the Free Application for Federal Student Aid (FAFSA). In general, the 2014-2015 FAFSA will include guidance explaining that marriage includes a legal marriage of persons of the opposite sex as well as legal marriages of persons of the same sex in jurisdictions where it is allowed. Further guidance is forthcoming.
3)	I would suggest the following change to the second sentence of the instructions for the "Step Four (Parent)" section at the top of page 6 of the draft paper FAFSA: "Grandparents, foster parents, legal guardians, aunts and uncles, and partners of biological or adoptive parents are not considered parents on this form unless they have legally	Resolved.	These instruction for Step Four (Parent) have been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i> .

	Comment	Status	Resolution
	<p>adopted you."</p> <p>I believe that this change will provide needed clarification concerning the change to who is considered a parent on the FAFSA.</p>		
4)	<p>1. On page 6 of the draft FAFSA Q#80 asks if parents completed their IRS tax return or another tax return listed in Q81? - What if the two parents answers differ? for example one parent filed and one parent did not</p> <p>2. On page 6 of the draft FAFSA Q#83 asks if your parents have filed or will file a 1040; were they eligible to file a 1040A or 1040EZ? what if the two parents answers differ? for example one parent had to file a 1040 and the other was eligible to file a 1040A</p> <p>3. I think you should provide a separate field for a suffix (Jr, III, etc.) instead of just having a space between the last name and the suffix in the last name field as many systems pull ISIRS into their system based on last name only and thus get hung up in suspense b/c of this. This slows down the processing of aid for those students.</p>	<p>1. Resolved</p> <p>2. Resolved.</p> <p>3. Resolved. No Change.</p>	<p>1. Help text is being added to FAFSA on the Web to clarify exactly what parents and students should enter in this situation.</p> <p>Additionally, text in the "Using Your Tax Return" section on page 1 of the paper FAFSA has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p> <p>2. Refer to response above.</p> <p>3. Spacing limitations prevent this from being included on the paper FAFSA. Each year, third party software providers are given Federal Student Aid (FSA) specifications for Institutional Student Information Record (ISIR) processing.</p>
5)	<p>Question 28 on the 2014-2015 FAFSA asks "Will you have your first bachelor's degree before July 1, 2014?" However, students earning their bachelor's degree after July 1, 2014 but during the 2014-2015 year would answer "no" to this question, and could and most likely have/will receive(d) Pell grant monies they are not eligible for. If they earn their degree in Dec 2014 then transfer and if the school</p>	Resolved.	The Department of Education will update the existing guidance on FAFSA on the Web to clarify this limitation on federal student aid.

	Comment	Status	Resolution
	<p>they transfer to does not require college transcripts or the student fails to submit them the student would unintentionally be paid pell grants. I can't imagine a student receiving Pell grant at the same school after receiving their degree in the Fall but that could happen as well.</p> <p>Could an additional question be added asking what month the student will earn their bachelor's degree if they are to earn it before June 30, 2015? Then schools can avoid unintentionally paying these students Pell grants.</p>		
6)	<p>Additional detail should be collected in regards to the household size; number in college; spouse name and SSN (if both parents information is needed, why not spouse info.; SNAP benefits (name of person in household receiving benefits); child support paid - listing all detail needed during verification.</p> <p>All of these can be easily accomplished by adding pop-up lists when they complete the field on FOTW. If these lists are completed, then the need for verification worksheets would no longer be needed. One of our biggest areas where students/parents make errors is on the verification worksheet list of household members months after completing the FAFSA - if it's completed at the same time, there would be no errors.</p> <p>(example: 4 in the household - must enter the information for 4 people or you cannot advance).</p>	Resolved. No Change.	The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process. The verification selection process is separate from the application process and takes place after the FAFSA has been submitted.
7)	<p>It would be most helpful if the field for marital status for both student and parent were not pre-filled in renewal applications. This is because the marital status can and does change from year to year, and many of the verification issues we are seeing arise from the household information conflicting with the tax filing status.</p>	Resolved.	For the 2014-2015 Renewal FAFSA, the parental marital status and dates are not being carried over. In addition, FAFSA on the Web will have new logic that compares the marital status with the response to the new tax filing status question for both students and parents. In this situation, the applicant would be

	Comment	Status	Resolution
	<p>For instance, if the parent marital status has been divorced previously, and then the IRS DRT is used showing tax filing status is married filing jointly due to the parent remarrying, then the FAFSA is most likely selected for verification. If the applicant was allowed to answer the marital status question each year, that might eliminate some of the FAFSA's that are currently being selected for verification.</p>		<p>alerted that he or she may need to make additional updates to his or her application.</p>
<p>8)</p>	<p>1. Even though almost all (98%) FAFSAs are now expected to be filed online the draft 2014-15 FOTW is not available for public comment in either static or interactive form, nor has it been in previous years. For example, a preview of the 2013-14 FOTW was not made available until late December 2012, too late to make any substantial improvements for the upcoming year. Making a preview version of the FOTW available during the public comment period would provide stakeholders the opportunity to weigh in on proposed changes and suggest improvements. Some information about FOTW is available in the “Data Elements and Justifications” chart and “Summary of Enhancements to the 2014-15 Free Application for Federal Student Aid (FAFSA),” but these textual descriptions of aspects of the online application are of limited use without an accompanying visual depiction of how applicants work their way through the process.</p> <p>2. We appreciate that applicants going through the main FAFSA portal (http://www.fafsa.ed.gov) are not actively encouraged to fill out the FOTW Worksheet before using FOTW, because this static worksheet lacks the skip logic and other helpful features of FOTW and may be confused with the paper FAFSA. However, to the extent that the Department continues to provide the FOTW Worksheet as a</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The updates that are included in each year’s application release take a considerable amount of input and effort by a large number of parties to define the requirements, ensure the accuracy of the functionality, develop the system, test the system and resolve any issues, apply security protocols, and clear the application with OMB. Because of the extensive amount of time needed to complete all of these activities, the date on which the application is currently provided via the FAFSA on the Web Demo site is the earliest that is possible. For 2014-2015, the Demo site is expected to be available on December 29, 2013.</p> <p>2. The Department of Education makes the FAFSA on the Web Worksheet available to students as a resource to assist them with completing the online application. This Worksheet does not ask for any additional data that is not already collected in the FAFSA and no burden to the public is associated with the Worksheet. Consequently, the FAFSA on the Web Worksheet is not part of this</p>

	Comment	Status	Resolution
	resource for students, it should also be available for public comment. Unlike previous years, the draft 2014-15 FOTW Worksheet is not included in the attachments for this information collection request.		information collection Clearance. However, it will be released through the Information for Financial Aid Professionals (ifap.ed.gov) website once it becomes available.
9)	<p>We recommend that the Department move “What is the FAFSA?” (currently page 10) to page 2 (in place of the first page of the Notes section that is currently on page 2). This important contextual information should be at the beginning, not the end, of the paper FAFSA. Moving it to the front of the form would allow students to learn more about the FAFSA before they start filling it out.</p> <p>To prevent confusion and make all the relevant information in the Notes section easier for applicants to see and use, we suggest moving the text currently on pages 2 and 9 to the end of the form, creating one continuous Notes section on pages 9 through 10.</p>	Resolved. No Change	The Department of Education needs to further assess this recommendation and will consider this as a potential future enhancement to the paper FAFSA.
10)	<p>Using Your Tax Return</p> <p>This section of the paper FAFSA is an important opportunity to promote the simplified online application process and encourage electronic filing. We greatly appreciate the Department’s ongoing efforts to improve the IRS Data Retrieval Tool. However, more can be done to encourage the use of FOTW and the IRS Data Retrieval Tool both for initial application and for any necessary corrections.</p> <p>We suggest changing the text of this section as follows:</p> <p>If you (or your parents) need to file a 2013 income tax return with the Internal Revenue Service (IRS), we recommend that</p>	Resolved.	<p>The text in the “Using Your Tax Return” section has been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
	<p>you complete it before filling out the FAFSA. If you have not completed your return yet, you can submit your FAFSA now using estimated tax information, and then you must correct that information after you file your return.</p> <p>The easiest way to complete or correct your FAFSA with accurate tax information is <i>by filing online</i> and using the IRS Data Retrieval Tool through www.fafsa.gov. In a few simple steps, <i>most students and parents who filed 2013 tax returns can view and transfer their tax information directly into the online FAFSA at www.fafsa.gov. you may be able to view your tax return information and transfer it directly into your FAFSA.</i></p>		
11)	<p>Filling Out the FAFSA</p> <p>Especially in difficult economic times, it is critical that students and families know to inform financial aid offices when their tax return does not reflect their current financial situation. To help applicants understand what kinds of “unusual circumstances” are relevant and how to address them, we recommend rewording the phrase that begins with “If you or your family has unusual circumstances...,” to:</p> <p>If you or your family has unusual circumstances that might affect your financial situation <i>experienced significant changes to your financial situation since filing your 2013 taxes</i> (such as loss of employment), complete this form to the extent you can, then. <i>Then</i> submit it as instructed and consult with the financial aid office at the college(s) you <i>applied to or plan to attend</i>.</p>	Resolved.	<p>The first paragraph in the “Filling Out the FAFSA” section has been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
12)	Step Two (Student) and Step Four (Parent) (Pages 4 and 6)	Forwarded	The Department of Education plans to issue

	Comment	Status	Resolution
	<p>The Department proposes adding two new questions about the student’s and parent’s tax filing status for 2013, to identify instances where the reported marital status on the FAFSA is inconsistent with the IRS tax return filing status. While we appreciate the need to address such conflicts, we request that the Department clarify the process for <i>resolving inconsistencies in this information</i>. Resolving such inconsistencies should not cause confusion or undue delays for students and families.</p>	to appropriate business unit.	guidance on this topic.
13)	<p>Step Three (Student) (Page 5)</p> <p>Questions 56-58: Unaccompanied homeless youth</p> <p>For several years, we have urged the Department to fix a persistent statutory problem in the FAFSA questions regarding homelessness, and to make it easier for students using the paper FAFSA to understand what they are being asked. As detailed below, we continue to 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.</p> <p>Title 20 of the U.S. Code specifies that certain unaccompanied youth meet the definition of independent students if they are homeless <u>or</u> 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 56 and 57 does not currently include those unaccompanied youth who are</p>	Resolved.	<p>Questions 56 - 58 will remain separate on the FAFSA. However, Questions 56 and 57 will be reworded to add “or were self-supporting and at risk of being homeless” to the end of each question. This change is consistent with the language that is in the law.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
	<p>determined to be self-supporting and at risk of homelessness, as mandated by 20 U.S.C. 1087vv (d)(1)(H). The statutory language follows, with italics for emphasis:</p> <p>(H) has been verified during the school year in which the application is submitted as <i>either an unaccompanied youth who is a homeless child or youth</i> (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act), <i>or as unaccompanied, at risk of homelessness, and self-supporting</i>, by—(i) a local educational agency homeless liaison, designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act; (ii) the director of a program funded under the Runaway and Homeless Youth Act or a designee of the director; (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 (iv) a financial aid administrator; or;</p> <p>We recommend replacing questions 56, 57, and 58 – which are long, confusing, and still do not cover all of the potential combinations of status and source of determination – with the following single question, which is already used as a filtering question in FOTW:</p> <p><i>On or after July 1, ____ [relevant year], were you homeless or at risk of being homeless? (See Notes on p. __ for how to answer this question.)</i></p> <p>The new question would be accompanied by a reference to the Notes section, and the first paragraph of the Notes for</p>		

	Comment	Status	Resolution
	<p>this question would read:</p> <p>Answer “Yes” if you received a determination <i>that you were an unaccompanied youth who was homeless, or self-supporting and at risk of homelessness, from any of the following sources</i> at any time on or after July 1, 2013:; that you were an unaccompanied youth who was homeless or, for question 58, at risk of being homeless.</p> <ul style="list-style-type: none"> - <i>Your high school or school district homeless liaison</i> - <i>The director, or designated staff, of an emergency shelter program funded by the U.S. Department of Housing and Urban Development</i> - <i>The director, or designated staff, of a runaway or homeless youth center or transitional living program.</i> - <i>A financial aid administrator at the school you attend or plan to attend.</i> 		
14)	<p>Step Four (Parent) (Page 6) Questions 59, 61-64, 65-68</p> <p>We applaud the Department for recognizing households with two legal parents, regardless of their gender or marital status. To assist dependent students whose parents are “unmarried and both parents living together,” we recommend <i>creating an online resource with information about how these students should fill out questions 80-94.</i> The current instructions on page 6 and page 9 (Notes for Step Four, questions 59-94) refer students to 1-800-4FED-AID. Students unable to call during the operating hours for that hotline (Monday-Friday, 8am-11:59pm ET) or with frequently asked questions would benefit from user-friendly online information, which could also reduce the need for phone assistance.</p>	Forwarded to appropriate business unit.	The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.

	Comment	Status	Resolution
15)	<p>Question 94a: Parents' 2013 Untaxed Income</p> <p>To avoid confusion with similar-sounding categories on the W-2 form, we recommend adding the following language to this question:</p> <p>a) Payments to tax-deferred 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. Don't include amounts reported in code DD (employer contributions toward employee health benefits).</p>	Resolved.	<p>The untaxed income questions (paper FAFSA Question 45a and 94a) will be updated to include the recommended text.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
16)	<p>Notes for questions 16 and 17</p> <p>We recommend replacing the unnecessarily detailed and potentially intimidating reference to the Defense of Marriage Act with a shorter instruction about how to report marital status.</p> <p>Report your marital status as of the date you sign your FAFSA. If your marital status changes after you sign your FAFSA, check with the financial aid office at the college. <i>Because same-sex unions are not recognized by federal law, only report opposite-sex marriages on the FAFSA. According to the Defense of Marriage Act (1996), "...the word 'marriage' means a legal union between one man and one woman as husband and wife, and the word 'spouse' refers to a person of the opposite sex who is a husband or a wife."</i> Therefore, same sex unions are not considered marriages for federal purposes, including the FAFSA.</p>	Resolved.	<p>As a result of the recent Supreme Court decision on the Defense of Marriage Act, the Department of Education believes this recommendation is no longer applicable. However, the Notes for questions 16 and 17 have been revised to reflect new guidance. .</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
17)	Notes for question 18 (State of legal residence)	Resolved. No Change.	The response to Question 18 varies by state. Section 483(a)(1) of the Higher Education Act,

	Comment	Status	Resolution
	<p>We recommend providing some guidance <i>about what “state of legal residence” means in the Notes section.</i> For example, how should dependent students respond if they attend college in one state but their parents live in another state?</p>		<p>as amended, requires inclusion of data items selected in consultation with the states to assist the states in awarding state student financial assistance.</p>
<p>18)</p>	<p>Notes for questions 56-58</p> <p>To simplify the application process for homeless youth and maintain consistency with legislative intent, we continue to recommend <i>revising the Notes as follows:</i></p> <ul style="list-style-type: none"> • “Youth” means you are 21 23 years of age or younger as of the day you sign this application. <p>The 21-or-younger definition of “Youth” in the draft Notes for questions 56-58 appears to conflict with legislative intent. While the statutory language of Title 20 does not specify ages pertaining to “unaccompanied homeless youth,” the congressional record shows clear intent to provide federal student aid access to unaccompanied homeless youth who would not otherwise qualify as “independent” and are unable to provide parental information. Additionally, the Government Accountability Office, in advising Congress on this and related issues, has defined disconnected youth as “youth aged 14 to 24 who are not in school and not working, or who lack family or other support networks.” Defining homeless youth aged 22 and 23 as independent, just like homeless youth aged 21 and younger, would address an unintended, unfair, and unnecessary disparity in the treatment of these vulnerable young people, simplifying their application process and ensuring they receive the aid they are eligible for.</p>	<p>Additional Research Needed.</p>	<p>The Policy team at the Department of Education is researching this issue. For now, the change recommended in this comment will not be made for the 2014-2015 FAFSA.</p> <p>The alternate path in FAFSA on the Web for any applicant whose age is 22 or 23, and does not answer “yes” to any of the FAFSA dependency questions:</p> <p>The applicant answers “yes” to “On or after July 1, 2013, were you homeless or were you at risk of being homeless?” The applicant then clicks on the “Next” button, and is taken to the “Homeless Circumstances” page.</p> <p>The applicant reviews the information on this page and selects one of the following:</p> <p>I will provide parental information, OR I am homeless or at risk of becoming homeless</p> <p>If the applicant selects “I am homeless or at risk of becoming homeless” and then clicks “Next” to continue, he or she is taken to the “Unable to Provide Parental Information” page.</p>

	Comment	Status	Resolution
	<p>If our proposed change is not accepted, <i>we request clarification on the “alternate path” for homeless youth aged 22 and 23.</i> The “Data Elements and Justification” document in this information collection states:</p> <p>Students aged 22 or 23 who answer “Yes” to the Homeless Filtering question will be taken down an alternate path to allow them to submit their application without parental data and follow-up with the financial aid office.</p> <p>This “alternate path” is not explained in these materials and it is not clear what the consequences are for these students if they do not provide parental information while still being considered dependent. Generally, dependent students who do not provide parental information are not eligible for Pell Grants or subsidized Stafford loans, and can only receive unsubsidized Stafford loans at the discretion of the college’s financial aid office.⁷ Homeless youth aged 22 and 23 should have access to the same federal aid options as homeless youth aged 21 and younger.</p>		<p>The applicant reviews the information on this page and selects one of the following:</p> <p>I will provide parental information; OR I am unable to provide parental information and acknowledge that my FAFSA will be submitted without calculating an EFC</p> <p>If the applicant selects “I am unable to provide parental information and acknowledge that my FAFSA will be submitted without calculating an EFC” and then clicks “Next” to continue, he or she is taken to the “Student Finances 1” page to begin entering his or her own financial information, bypassing the pages that collect information about the parent(s). Upon submission of the FAFSA, no EFC is calculated, and the “Special Circumstances” flag on the ISIR is set to “3” (Unaccompanied homeless individual). This alerts the FAA to the reason why no EFC was calculated, and helps the FAA to determine what additional information to request from the applicant to make the final determination on the applicant’s homeless status.</p> <p>If the FAA approves the applicant’s homeless status, the FAA indicates this by setting the “Dependency Override” flag to “4” (Homeless youth determination). The system then treats the student as independent and calculates an</p>

	Comment	Status	Resolution
			<p>EFC.</p> <p>The specific text that is presented to students who follow this path can be viewed in the demonstration version of FAFSA on the Web, available at fafsademo.test.ed.gov.</p>
19)	<p>What is the FAFSA? (Page 10)</p> <p>We recommend adding the following language in italics to the last sentence of the “How do I find out what my Expected Family Contribution (EFC) is?” section for clarification:</p> <p><i>You can make corrections or provide additional information, as necessary, online at www.fafsa.gov (using your PIN) or by following the instructions on page 5 of your SAR.</i></p> <p>Space constraints understandably limit the amount of information on the paper form, but applicants would benefit from knowing a little more about what to expect after submitting the FAFSA. It would be helpful for this section to briefly explain the next steps in the aid process: after filling out the FAFSA, students will receive a Student Aid Report (SAR), which summarizes the data they submitted on the FAFSA and provides information on federal aid eligibility. Later, they will receive financial aid award letters from colleges where they apply and are accepted with more details about all the aid they qualify for. The Department has already recognized the need for such information by answering the question, “Who will I hear from, and when?” at http://studentaid.ed.gov/fafsa/next-steps#who-will-i-hear-from-and-when.</p>	<p>Resolved. No Change</p>	<p>The Department of Education believes the current output documents provide adequate guidance.</p>

	Comment	Status	Resolution
20)	<p>1. On the first page of the 2013-14 FOTW Worksheet, the text in the “Applying is easier with the IRS Data Retrieval Tool!” box reads: “Beginning in early February 2013, students and parents who have completed their 2012 IRS tax return may be able to use FAFSA on the Web to electronically view their tax information. With just a few simple steps, the tax information can also be securely transferred into the FAFSA.” To improve clarity, we suggest rewording this text in the 2014-15 FOTW Worksheet to:</p> <p>Beginning in early February 2014, students and parents who have <i>filed</i> their 2013 IRS tax <i>returns</i> will be able to <i>securely view and transfer their own tax information right into the online FAFSA</i> with just a few simple steps.”</p> <p>2. See our suggestion above for improving the wording of “Using Your Tax Return” on page 1 of the paper FAFSA, to better encourage the use of the IRS Data Retrieval Tool.</p> <p>3. We strongly encourage the Department to mark the questions on the FOTW Worksheet, and on the paper FAFSA, that could be pre-populated using the online IRS Data Retrieval Tool. The 2013-14 FOTW Worksheet currently asks users to fill in several pieces of data from their tax forms that could be pre-populated instead, but this is not made clear to the user.</p> <p>4. While we commend the Department for mentioning the IRS Data Retrieval Tool in a box on page 3 of the 2013-14 FOTW Worksheet labeled “Did you know?” and describing it as “the easiest way to provide accurate tax information,” this text is too easy to miss compared to more prominent</p>	<p>1. Resolved</p> <p>2. Resolved.</p> <p>3. Resolved. No Change.</p> <p>4. Resolved.</p>	<p>1 and 2. The paper FAFSA and the FAFSA on the Web worksheet contain updated instructional text in this section.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p> <p>3. No change.</p> <p>4. The text “You/Your parents will need...” has been removed from the FOTW Worksheet and similar text has also been removed from the Paper FAFSA.</p>

	Comment	Status	Resolution
	<p>and repeated exhortations to have tax returns in hand. The bold text at the bottom of the box to the immediate right titled “Did your parents file or will they file a 2012 tax return?” says, “Your parents will need their tax returns and/or W-2 forms to complete the FAFSA.” This appears to contradict the adjacent message encouraging use of IRS Data Transfer. There is a similar problem with the boxes at the top of page 4 of the 2013-14 FOTW Worksheet. We recommend merging the adjacent boxes in these sections and using the expanded space to help applicants understand how the IRS Data Retrieval Tool can make the FAFSA easier to complete, and when they can expect their tax information to be available for transfer.</p>		
<p>21)</p>	<p>1. We strongly urge the Department to work with the IRS to extend the substantial benefits of IRS data retrieval to more applicants and potential applicants. In its current form, the IRS Data Retrieval Tool only draws data from IRS 1040 forms, not from the W-2 or 1099 forms that can provide important earnings information for those who do not file a 1040 because they earn too little to owe federal income tax. Almost three-quarters of Pell Grant recipients have incomes so low that they do not owe federal income tax, as discussed in more detail in our 2010 report, <i>After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid</i>.</p> <p>2. We encourage the Department to consider how the IRS Data Retrieval Tool could be integrated into the FAFSA4caster. This would not only help provide early aid eligibility estimates to students and parents just beginning to explore college options and affordability, but also make</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The IRS Data Retrieval Tool does not include W-2 information as a separate line item, and to obtain this information would be a collaborative effort between the IRS and the Department of Education. The Department will have conversations to explore this issue. In the meantime, the Department will continue to reach out to low income and non-tax-filers to communicate helpful information about the benefits of filing a tax return, including information about our partnership with the Volunteer Income Tax Assistance (VITA) Program, which provides tax return preparation assistance to low-income tax payers.</p> <p>2. FAFSA4caster does not collect personally identifiable information. In order to use the</p>

	Comment	Status	Resolution
	them aware of the Tool well before they face the FASFA itself.		IRS Data Retrieval Tool with FAFSA4caster, personally identifiable information would need to be entered. FAFSA4caster is intended to be a quick estimate of the financial situation of the applicant.
22)	<p>Page 1 [Student Aid Report] (SAR)</p> <p>1. We encourage the Department to place and present information on the SAR so that it is most helpful for students and their families. The first page should include a table of contents or outline that tells applicants what they will find in the different sections of the SAR.</p> <p>2. Also on this page, applicants should be notified of the portability of federal student aid. Applicants need to know that federal aid can be used to cover higher education expenses including tuition and fees, living expenses (room and board), books and supplies, and transportation and miscellaneous personal expenses. This important information will help students and their families as they apply for college and review financial aid award letters, since it is a common misperception that financial aid is only for tuition and fees.</p> <p>3. The Department should also consider incorporating data on the selected colleges' net price by income, or at least links to the colleges' net price calculators, into the SAR. This would give applicants important, school-specific information about the costs they may be expected to cover based on their families' circumstances.</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p> <p>3. Resolved. No Change.</p>	<p>1. The current design of the Student Aid Report (SAR) is based on previous usability studies that were conducted with applicants. The Department of Education believes the layout of the SAR is sufficient to inform applicants about what they need to know, and considers that a table of contents or an outline is unnecessary and would cause undue burden on the public.</p> <p>2. The Department of Education has published several resources geared towards students to help them understand federal student aid. These resources can be found on StudentAid.gov</p> <p>3. This information is covered adequately in other places, such as StudentAid.gov, the school award letters and the Shopping Sheet at ED.gov.</p>
23)	Page 2 [Student Aid Report] (SAR)	Resolved. No Change.	Shifting the legal disclosures from page 2 to page 11 on the paper Student Aid Report (SAR)

	Comment	Status	Resolution
	We recommend moving the Office of Management and Budget’s (OMB) legal disclosure and a section reserved exclusively for Financial Aid Office use from page 2 to the end of the SAR packet. In the online SAR, the OMB legal disclosure already appears at the end.		would place the disclosure on the back of page 10. Since page 10 needs to be submitted in the event a correction is made to the paper SAR, this would mean that the disclosure would also be submitted. The Department of Education prefers that the student retain the disclosure with their records.
24)	<p>Page 3 [Student Aid Report] (SAR)</p> <p>1. The “What You Must Do Now” section should start with the most immediate action, which is reviewing the information and making any changes necessary, including sub-bullets flagging where a correction or information is clearly required. It should also make explain, in the simplest terms possible, why these actions must be taken quickly. For example, the item currently at the top of this list in the sample draft SAR notes that NSLDS shows discharged loans, but it conveys neither urgency nor rationale. This should either appear lower on the list with improved wording or be moved to the “Summary of Federal Student Loans” section.</p> <p>2. In addition, “What You Must Do Now” is be a more appropriate place to remind applicants to update their drug conviction status, if necessary, than the unnecessarily harshly worded “Warning” currently beneath the OMB disclosure on page 2.</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The “WHAT YOU MUST DO NOW...” section is customized to each applicant’s situation: the sample draft SAR is just that - a sample. The information listed for each student conveys messaging and instructions specific to the individual. The Department of Education believes the guidance, as laid out in this section, is adequate.</p> <p>2. The “Warning” text displayed on page 2 is a type of disclaimer displayed on all Student Aid Reports (SAR). In the event that a student has been convicted of drug distribution or possession with ineligibility for Title IV aid included as part of sentencing, there would be a match with the Department of Justice file, and specific SAR comments would appear on page 3.</p>
25)	<p>Page 4 – Summary of Federal Student Loans [Student Aid Report] (SAR)</p> <p>To help applicants better understand their current borrowing and repayment options for federal student loans, we recommend the following changes.</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The information provided reflects data that is available from NSLDS at the time an initial application is processed; it may not necessarily be “current”.</p> <p>2. The Department of Education uses the</p>

	Comment	Status	Resolution
	<p>1. Rename subsection title to “Summary of Your Current Federal Student Loans.”</p> <p>2. Include some reference to the term “Stafford,” as it may appear in financial aid award letters, is sometimes used in the Department’s consumer materials, and is frequently used in the interest-rate policy debate.</p> <p>3. Delete the third paragraph under “Summary of Federal Student Loans.” Instead of providing generic, hypothetical information about interest rates and monthly payments, it would be much more helpful to list the actual interest rates for each of the applicant’s outstanding loans under “Total Amount of Loans Outstanding.” Consider also providing the 10-year payment for each outstanding loan and a total 10-year payment based on totaloutstanding debt, if accompanied by basic information about other repayment plans and a link to a repayment calculator as described under 2.c. below.</p>	<p>3. Resolved. No Change.</p>	<p>generic terms “Subsidized” and “Unsubsidized” on this page, and believes these terms are more descriptive and adequately convey loan type information.</p> <p>3. The information provided is generic information; each student’s situation is different.</p>
26)	<p>1. Change “Total Amount of Loans Outstanding” to “Total Amount of Federal Loans Outstanding” and distinguish Direct Loans from FFEL Loans, listing Direct Loans first. Instead of referring to FFEL as “Bank Loans,” which could easily be confused with private loans, add an asterisk (*) after FFEL and provide a basic description that these are federal loans that were made through banks or other lenders before July 2010.</p> <p>2. Add a new subsection, “More Information About Student Loans” that provides the following information:</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The Department of Education believes the text located above the chart provides adequate information about the “Summary of Federal Student Loans” section.</p> <p>2. The Department of Education believes the information provided in this section of the SAR is adequate. The purpose of the SAR is to provide information about a processed FAFSA. Links to the Web that contain important information such as the information suggested are made available on the paper SAR.</p>

	Comment	Status	Resolution
	<p>a. The types of federal loans for which applicants may be eligible and the basic terms of these loans, as well as maximum annual loan amounts and the fact that they can borrow less than the maximum.</p> <p>b. The possibility that the aid packages applicants later receive from schools will reference other types of loans as well, highlighting the terms and borrower protections unique to federal student loans and warning students and families about the risks of private student loans. This will help reinforce the Department’s important message in its online consumer information about borrowing – that federal loans should come first for those who need to borrow. See, for example: http://studentaid.ed.gov/types/loans/federal-vs-private and http://www.ed.gov/blog/2012/10/five-things-to-know-about-your-student-loans/. Providing this essential information early in the aid process will help equip applicants to better evaluate whether, how, and how much to borrow.</p> <p>c. Either in this section or immediately below “Total Amount of Federal Loans Outstanding,” the availability of different types of federal loan repayment plans, including income-driven plans. This should be accompanied by a link to a single web-based calculator that estimates monthly payments under different repayment plans. If a multi-plan repayment calculator is not available by the time the 2014-15 SAR is finalized, then provide a link to the FSA “Repayment Plans” page, which has links to various plan-specific calculators, at http://studentaid.ed.gov/repay-loans/understand/plans.</p>		<p>However, to include the totality of this information on the paper SAR is impractical and will add undue burden to the public.</p>

	Comment	Status	Resolution
27)	<p>Check Your SAR (Pages 5-10)</p> <p>We suggest eliminating the fourth bullet point, “Use your Federal Student Aid PIN to make corrections online at www.fafsa.gov or send in pages 5-10 of this form,” and creating a new set of instructions for the header on page 5. We recommend that the Department use a slightly revised version of the instructions provided on page 3 of the draft SAR:</p> <p>If you need to make corrections to your information, you may either make them online at www.fafsa.gov, or by using this SAR and mailing pages 5-10 to the address provided on page 10. You must use your Federal Student Aid PIN to access your record online. If you need additional help with your SAR, contact your school's financial aid office or visit www.fafsa.gov and click the "Help" icon on the FAFSA home page. If your mailing address or e-mail address changes, you can make the correction online or send in the correction on your SAR.</p>	Resolved. No Change.	The Department of Education believes the information provided in this section of the SAR is adequate.
28)	<p>There are two versions of page 10 in these draft materials, page 10Q and page 10V, but it is not clear why two different templates are necessary. To help applicants understand that they only need to read and sign the certification if they made changes to their SAR, we recommend modifying the draft page 10V as follows:</p> <p>1. Move “If you made no changes” and the bullet point below that header to the top of the Certification section, above “Please read, sign, and date. You must read and sign this Certification.”</p>	Resolved. No Change.	The applicant will only receive one version of page 10 of the Student Aid Report (SAR). The version an applicant receives depends on whether or not the FAFSA has been rejected. Applicants with a rejected FAFSA receive page 10Q of the SAR; this version contains the full certification statement for applicants to sign and submit. Applicants with a processed (non-rejected) FAFSA receive page 10V, which does not contain the full certification statement.

	Comment	Status	Resolution
	<p>2. In the bullet under “If you made no changes,” specify the location of the SAR instructions that indicate whether the applicant needs to contact his or her school.</p> <p>3. Move the Certification below the “If you made changes” section, and make the words “If you made changes” more visually prominent, especially “made changes.”</p>		
29)	The Department should provide applicants with contact information for the financial aid offices of the schools they selected to receive FAFSA results. Contact information for colleges’ financial aid offices is not available via the College Navigator web site, so listing a phone number on the SAR would be a great help to applicants who need to speak with a financial aid representative.	Resolved. No Change.	The suggestion in this comment cannot be implemented since different schools have preferred methods of how they wish for students to contact them.
30)	<p>We also recommend moving the statement about where to find more information on the colleges listed on the FAFSA from the middle of page 10 to the first page of the SAR, so that applicants are more likely to see it. We further suggest revised language to highlight the fact that more important consumer information is available on College Navigator than the online SAR:</p> <p>For more information about the colleges you listed on your FAFSA, visit College Navigator at www.nces.ed.gov/collegenavigator or view your Student Aid Report online at www.fafsa.gov for the graduation, retention, and transfer rates. For the graduation, retention, and transfer rates of the colleges you listed on your FAFSA, view your Student Aid Report online at www.fafsa.gov. You can also find these rates and other important consumer information about the colleges you’re interested in on</p>	Resolved.	The Department of Education believes the statement provided in this section of the SAR is in a convenient location. However, text on Pages 10V and 10Q above Step Seven has been updated to read: For the graduation, retention, and transfer rates of the colleges you listed on your FAFSA, view your Student Aid Report online at www.fafsa.gov . You can also find these rates and other important consumer information about the colleges you’re interested in attending at www.nces.ed.gov/collegenavigator .

	Comment	Status	Resolution
	<i>College Navigator at www.nces.ed.gov/collegenavigator.</i>		
31)	<p>My FAFSA Page</p> <p>It is helpful that this page includes information about what happens next in the aid application process (see screenshot in Appendix A). We suggest adding the following to the fourth bullet point:</p> <ul style="list-style-type: none"> • <i>The school(s) where you are accepted will send you a financial aid award letter with more details about all the aid you qualify for. If you have questions about your financial aid package contact your school(s).</i> <p>We also recommend making the link to the SAR more prominent, to encourage applicants to review their processed information to see if any additions or corrections are needed. On the “My FAFSA” page, the SAR is just one of three sets of small links at the bottom.</p>	Resolved. No Change.	The design of the My FAFSA page and Confirmation page, including the SAR links, are based on recent usability studies and customer feedback.
32)	<p>Electronic SAR</p> <p>To clarify the purpose of presenting the processed FAFSA information in the SAR and the instructions for making corrections, we suggest modifying the text under “WHAT YOU MUST DO NOW” on both the PDF and HTML versions of the online SAR to say:</p> <p>WHAT YOU MUST DO NOW (Use the checklist below to make sure that all of your issues are resolved.)</p> <p><i>Review the information you submitted on the FAFSA (shown in the table below) to see if any additions or corrections may</i></p>	Resolved. No Change.	The Department of Education believes the proposed solution would cause confusion and introduce potential security risks.

	Comment	Status	Resolution
	<p><i>be needed. If you need to make corrections to your information, go to the FAFSA on the Web Corrections page. click 'Make FAFSA Corrections' on the 'My FAFSA' page. You must use your Federal Student Aid PIN to access your record online. If you need additional help with your SAR, contact your school's financial aid office or click the 'Help' icon on the FAFSA home page. If your mailing address or e-mail address changes, you can make the correction online.</i></p> <p>Since this document is presented online, the reference to the “FAFSA on the Web Corrections page” should be a clickable link, not a set of directions that requires the applicant to go back to the main “My FAFSA” page to find a link to the corrections page.</p>		
33)	<p>We recommend moving the last three paragraphs under the table for “Your Financial Aid History Information” to the “Comments About Your Information” section at the top, before “FAFSA Data,” and making the recommended wording change below. These paragraphs are:</p> <p>At this point, the school(s) listed on your application FAFSA have access to your information. The school(s) may put together or change an aid package based on your Expected Family Contribution and notify you.</p> <p>The amount of aid you receive from a school will depend on the cost of attendance at that school, your enrollment status (full-time, three-quarter-time, half-time, or less than half-time), Congressional appropriations, and other factors. Review your financial aid notification from the school(s) or</p>	Resolved. No Change.	The Department of Education believes the information provided in this section of the SAR is in a convenient location, and the recommended text changes are unnecessary since this information is covered adequately in other places.

	Comment	Status	Resolution
	<p>contact the Financial Aid Administrator at the school(s).</p> <p>Note: Your school has the authority to request copies of certain financial documents to verify information you reported on your application.</p>		
34)	<p>We begin with a general concern that, while references to legal, adoptive, and biological parents are necessary, FAFSA instructions must ensure that students do not interpret those references to mean that stepparent (i.e. non-legal parent) information should not be reported under any circumstances.</p> <p>We recommend the following revisions to Step Four of the paper FAFSA:</p> <ol style="list-style-type: none"> 1. After the sentence that reads “Complete this step if you (the student) answered “No” to all questions in Step Three”, we recommend adding this sentence: IMPORTANT - Before completing Step Four, review the notes for questions 59-94 on page 9. 2. We recommend changing this sentence: Current wording: If your parents are not married to each other and live together, answer the questions about both of them. Proposed wording: If your legal (biological or adoptive) parents are not married to each other and live together, answer the questions about both of them. 3. We recommend the following revisions to the FAFSA on the Web (FOTW): In the “Parent Demographics Information” 	<ol style="list-style-type: none"> 1. Resolved. No Change 2. Resolved. 3. Resolved. No Change 4. Resolved. 	<ol style="list-style-type: none"> 1. All notes and information on the FAFSA are important. Making the suggested change would undermine the importance of the entirety of the application. 2. Step Four (Parent) instruction will be revised to include the recommended text. For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>. 3. In order to provide all of the guidance for who is considered a parent, the suggested change has been provided in a separate window as a Help Topic on FAFSA on the Web. The Help Topic window provides more space than the Help and Hints text “box.” The “Help and Hints” in FAFSA on the Web is intended to be a type of “quick reference” for users. Those who need additional information are instructed to click on the “More>>>” link in the “Help and Hints” box to get additional information.

	Comment	Status	Resolution
	<p>section (questions 59-74), we recommend displaying detailed “Who is considered a parent?” information prominently in the “Help and Hints” box, rather than simply linking students to that information via the “parents” hyperlink.</p> <p>4. FOTW “Who is considered a parent?” information should be revised to reflect instructions for (legal) parents who are not married to each other and live together. We recommend the following wording: If your legal (biological or adoptive) parents are not married to each other and live together, provide information about both of them.</p>		<p>4. The Department of Education is updating the help topic “Who is considered a parent?” and providing the recommended guidance.</p>
35)	<p>I would like to request addition clarification for question #28 - "Will you have your first bachelor's degree before July 1, 2014". This does not address those students who receive a master's degree without obtaining a bachelor's degree (nor do the instruction, help, or hints).</p> <p>FSA Handbook, Volume 1 Chapter 6, page 1 http://www.ifap.ed.gov/fsahandbook/attachments/1213FSAHbkVol1Ch6.pdf states: A student who has earned a baccalaureate degree or a first professional degree cannot receive a Pell grant.</p> <p>A student who completes a master’s program has earned a degree beyond the baccalaureate level (in many instances a professional degree), making her ineligible for a Pell grant even if she does not have a bachelor’s degree and enrolls in an undergraduate program.</p> <p>I would respectfully request this clarification be addressed</p>	Resolved.	The recommended clarification will be added to FAFSA on the Web help text.

	Comment	Status	Resolution
	on the FAFSA.		
36)	<p>In the past, schools will receive comment codes on the student's ISIR if the student is male and has failed to answer the question "Have you registered with Selective Service?", which pops up after answering the gender question. The student has the option to answer "Yes, No, or Register me." If the student overlooks this question, additional steps must be taken by the institution at a later time to acquire confirmation from the student confirming that this process has been completed. This causes inconvenient delays to the student and the institution in the providing of timely financial aid eligibility.</p> <p>Would it be possible to make this question a "required answer" field that MUST be answered before allowing the student to proceed on to the next page of the application? It would seem that this would only require a small bit of programming logic added to the current process. This simple addition would alleviate a lot of work from the institutions, while making greater strides in ensuring that the male students are addressing their federal responsibility</p>	Forwarded to appropriate business unit.	This suggestion has been referred to the appropriate business unit to review recommendations.
37)	<p>1. Paper FAFSA, page 2 - Great explanation on what status defines an eligible noncitizen (and what does not define as an eligible noncitizen).</p> <p>However, the following statement, "If you have a Social Security Number but are not a citizen or an eligible noncitizen, you should still complete the FAFSA because you may be eligible for state or college aid." may confuse states that require a separate application and not a FAFSA.</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The guidance given is provided as clarification that the FAFSA cannot be submitted without a Social Security Number (SSN). The word "may" is used as a qualifier here because it is up to each individual state or institution to determine what is required for these students to apply for state or college aid.</p> <p>2. While the Department of Education understands the commenter's concerns, there</p>

	Comment	Status	Resolution
	<p>For example:</p> <p>In CA, students in this situation must submit a Dream application and an affidavit form to be eligible for state or college aid. Unless they now plan to use the FAFSA, which I am not aware of.</p> <p>2. ALSO - Paper FAFSA, page 6 - For parents who do not have an SSN and enter 000-00-0000 & select "will file" or "already filed" has been red flagged as an error before final submission online (parents without SSN's do file taxes). Students have to click "check for errors" twice to bypass, or are unsure how to correct this error and do not submit thinking parents are required to have an SSN.</p> <p>I recommend that "check for errors" not hold or red flag FAFSA on the web submission for this reason. This could result in earlier submissions and students/parents less afraid to report information on FAFSA.</p>		<p>is a definite need for this edit. Parents without a Social Security Number (SSN) are allowed to file a federal tax return with the IRS using a Taxpayer Identification Number (TIN). This edit allows the user to confirm that the information provided (that taxes were filed without an SSN) is correct. The user must click the "Check for Errors" button just once to confirm this information. When the information is confirmed, the Reject J override flag is set on the ISIR. The purpose of this flag is to inform the Financial Aid Administrator (FAA) that taxes were filed without a Social Security Number. The FAA then has the discretion to request additional information from the student.</p>
38)	<p>As part of the federal Affordable Care Act, employers must now report the amount they contributed toward their employees health benefits in box 12 on the W-2 form. The amount is reported with a code of "DD".</p> <p>FAFSA Questions #45a and 94a, "Deferred pensions," instruction students and parents to report amounts in W-2 box 12 with codes D, E, F, G, H and S. Some families have incorrectly reported the DD amount here because they are confused between the "D" and "DD". This causes their income to be overstated by the amount of the employers contribution towards healthcare.</p>	Resolved.	<p>Refer to comment #15 for resolution.</p>

	Comment	Status	Resolution
	<p>I believe these two questions need to be revised with explicit instructions IN BOLD that the "DD" amount should not be included. Please refer to the attached for suggested language.</p>		
<p>39)</p>	<p>FAFSA: page 2, notes for Q #50</p> <p>The instructions do not include a caveat about basic training for certain service members.</p> <p>Answer “Yes” (you are a veteran) if you (1) have engaged in active duty (including basic training) in the U.S. Armed Forces or are a National Guard or Reserves enlistee who was called to active duty for other than state or training purposes, or were a cadet or midshipman at one of the service academies, and (2) were released under a condition other than dishonorable. Also answer “Yes” if you are not a veteran now but will be one by June 30, 2015.</p> <p>Answer “No” (you are not a veteran) if you (1) have never engaged in active duty (including basic training) 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 Reserves 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.</p> <p>Also answer “No” if you are currently serving in the U.S. Armed Forces and will continue to serve through June 30, 2015.</p>	<p>Resolved.</p>	<p>The Notes for question 50 have been updated to include the recommended text.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
	Rationale: See 2013-2014 FSA Handbook, p. AVG-22.		
40)	<p>FAFSA: page 2, notes for Q #16 and #17</p> <p>Remove DOMA information and refer students to page 9</p> <p>Report your marital status as of the date you sign your FAFSA. If your marital status changes after you sign your FAFSA, check with the financial aid office at the college. See additional notes on page 9.</p> <p>Rationale: GEN-13-12</p>	Resolved.	<p>The Notes for questions 16 and 17 have been revised to reflect new guidance. However, the reference to page 9 has not been added because questions 16 and 17 pertain to the student's marital status, whereas the information on page 9 that the Department of Education believes this comment refers to is specific to the parents.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
41)	<p>FAFSA: page #6, Q #59</p> <p>Add note to reference DOMA information on page 9.</p> <p>Married or remarried, see notes, page 9.</p> <p>Rationale: GEN-13-12</p>	Resolved.	<p>The Step 4 instructions direct the applicant to the Notes on page 9, which have been updated to include guidance stemming from the recent Supreme Court decision on the Defense of Marriage Act.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i></p>
42)	<p>FAFSA: page 6, instructions for completing Q #80-94 AND Page 9 notes</p> <p>It would be helpful, and reduce potential errors, for ED to create a worksheet for students/parents to complete to</p>	Resolved.	<p>Page 6 instructions and page 9 Notes have been updated to provide appropriate guidance.</p> <p>For more information, see the document</p>

	Comment	Status	Resolution
	<p>determine whose information must be provided on the FAFSA.</p> <p>ED would develop the worksheet, similar to the drug conviction worksheet.</p> <p>Rationale: GEN-13-12</p>		<p>entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
43)	<p>FAFSA: page 9</p> <p>Add a section about the definition of marriage; it can be referred to on multiple sections of the application.</p> <p>Definition of “Married”</p> <p>Due to the recent Supreme Court decision regarding DOMA, this language will need to be revised accordingly. We still feel this section is needed for additional clarification.</p> <p>Rationale: GEN-13-12; Supreme Court Decision June 26, 2013.</p>	Resolved.	<p>The Notes for Step Four on page 9 have been updated to reflect new guidance.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
44)	<p>Student Aid Report: page #1, Application Status, 2nd check box</p> <p>Your FAFSA has been selected for verification. Verification is a process where your school confirms the data you reported on your FAFSA. Your school has the authority to contact you for documentation that supports income and other information that you reported on your FAFSA. <i>Your federal financial aid may be delayed until the school receives your requested information.</i></p>	Resolved. No Change.	<p>This SAR comment is intended to define verification, not to state the consequences of not following up since the verification process varies by school.</p>

	Comment	Status	Resolution
	Rationale: This language will help the student understand the consequence of not providing the school with additional documentation.		
45)	<p>Student Aid Report: page #1, Federal Student Aid Eligibility, paragraph 1</p> <p>The data submitted on your FAFSA-is was used to calculate your Expected Family Contribution (EFC), which is 0000.</p> <p>Rationale: The EFC has already been calculated based on submitted data. Therefore, past tense is accurate.</p>	Resolved. No Change.	The Department of Education considers this suggestion a stylistic preference.
46)	<p>Student Aid Report: page #1, Federal Student Aid Eligibility, paragraph 2, sentence 2</p> <p>Rather, you should think of the EFC as is an index that colleges use to determine how much financial aid you would could receive if you were to attend their school.</p> <p>Rationale: Less confusing and more succinct text.</p>	Resolved. No Change.	The Department of Education considers this suggestion a stylistic preference.
47)	<p>Paper Student Aid Report: Federal Student Aid Eligibility</p> <p>Based on your EFC it appears that you may be eligible for a Federal Pell Grant of up to \$5785, provided you have not met or exceeded the lifetime limit established for the Federal Pell Grant program. <i>This amount may be adjusted based on FAFSA data changes and your enrollment status.</i> You may also be eligible for other grants, low-interest student loans, and work-study opportunities.</p> <p>Rationale: This language reinforces for students that the amount of Pell listed on this SAR can change if any</p>	Resolved. No Change.	The Department of Education believes the addition of this text changes the meaning of the paragraph. The text, as is, uses the qualifiers of “may” and “up to” to inform the student of maximum aid eligibility based on the information provided. The Department of Education is communicating general eligibility information; the proposed text does not support that goal.

	Comment	Status	Resolution
	subsequent changes to the FAFSA are made.		
48)	<p>Student Aid Report: page #4, Summary of Federal Student Loans, paragraph 3</p> <p>Why use 5% as the interest rate? Why not use 6.8% as it provides a better estimate to borrowers?</p> <p>Change 5% rate to 6.8% and change the approximate payment as well</p> <p>Rationale: 6.8% is a better estimate for the majority of students, and at worst-case, it estimates the repayment higher than the actual; the 5% could estimate it lower than the actual.</p>	Resolved. No Change.	The interest rates in the Summary of Federal Student Loans are set by legislation and the information is provided by the National Student Loan Data System (NSLDS). The percentage used in this section of the SAR is only an example.
49)	<p>FAFSA: page #1, Applying by the Deadlines, paragraph 3</p> <p>Revise as follows: Check with your high school or the financial aid office about sources of state and college aid and their applicable deadlines.</p> <p>Rationale: Clarity.</p>	Resolved. No Change.	The Department of Education considers this suggestion a stylistic preference.
50)	<p>FAFSA: Part One, page #3, Q #13, sentence 4</p> <p>Your e-mail address will also be shared with your state and the colleges listed on your FAFSA to allow them to electronically communicate with you.</p> <p>Rationale: Clarity.</p>	Resolved. No Change.	The Department of Education believes the proposed change is redundant as the term “e-mail” means “electronic mail”.
51)	<p>FAFSA: page #3, Q #26</p> <p>When you begin college in the 2014-2015 school year, what</p>	Resolved. No Change.	School year is defined by the school and may be different depending on the school.

	Comment	Status	Resolution
	<p>will be your high school completion status?</p> <p>Rationale: Clarity. School year is not a defined term and may create confusion.</p>		
52)	<p>FAFSA: page #4, column 2, notes for Step Four</p> <p>Revise the Notes for Page Four, questions 59-94 by adding the language: If your parents are not married to each other and live together, select “Unmarried and both parents are living together” and provide information about them <i>regardless of marital status or gender</i>. Contact 1-800-4FED-AID for assistance completing questions 80-94.</p> <p>Rationale: This additional statement clarifies that regardless of the parents’ gender, both unmarried parents’ information needs to be reported based on DCL.</p>	Resolved.	<p>The Notes for Step Four, questions 59-94 (pages 6 and 7) have been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
53)	<p>1. One is to request a bigger warning to students to NOT include their parents in the number in college. If their family size is greater than 3, they are rarely verified, yet they are often including parents and we find out later that they didn't read it well. It has such a dramatic impact on the EFC that they should have to list the same info. on the FAFSA as they do on verification worksheet for all they report as in college (which school, number of credits, etc.).</p> <p>2. The other item is related to an applicant updating tax information on the FAFSA. There should be a special popup reminding them to correct the "will file" question to "did file" when they update their tax information. Even better would be an automatic update on that field on the FAFSA when they update. So many miss that step and we spend a</p>	<p>1. Resolved.</p> <p>2. Resolved. No Change</p> <p>3. Resolved No Change.</p>	<p>1. A new sentence reminding applicants to not include parents has been added to the “number in college” question in FAFSA on the Web.</p> <p>2. The current functionality in FAFSA on the Web is such that, when a student or parent returns to FAFSA on the Web to correct or update their tax information, and the current tax filing status is “Will file”, an alert displays on the Student Finances 1 or Parent Finances 1 page reminding the user to update their tax filing status if they have now filed a tax return.</p> <p>3. The current functionality in FAFSA on the</p>

	Comment	Status	Resolution
	<p>lot of time telling families to change that flag, when it should be somewhat automatic when they update their tax info.</p> <p>3. Also, since the IRS process works successfully for so many, maybe more instructions to the ones that it doesn't work for could be added. For the late filers, amended returns, newly divorced, etc., it is not easy for them to understand what to do next.</p>		<p>Web is such that, when a student or parent is ineligible to use the IRS Data Retrieval Tool, for any one of the following reasons:</p> <ul style="list-style-type: none"> • Filed as “Married filing separately, or • Married and filed as Head of Household, or • Filed an amended tax return, or • Filed a Puerto Rican or foreign tax return <p>The following message displays: “Based on your response, you are not eligible to transfer your information from the IRS into this FAFSA. Click Next to continue.”</p> <p>The Department of Education believes that this message is clear and easy to understand.</p>
54)	<p>Payments to tax-deferred pension and savings plans (Q. 45a, 94a) – 2 comments:</p> <p>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> <p>1. 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</p>	<p>1. Resolved.</p> <p>2. Resolved.</p>	<p>1. Questions 45a and 94a have been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p> <p>2. Refer to comment #15 for resolution.</p>

	Comment	Status	Resolution
	<p>the W-2 forms in Boxes 12a through 12d, codes D, E, F, G, H, and S.”</p> <p>In 2013/14, many students/parents included amounts from W-2 form, Box 12, code DD as untaxed income. Box 12 code DD reports the cost of employer-sponsored health coverage and was intended to be informational only per the IRS instructions. We had to remove this amount as untaxed income on a number of FAFSA applications since the families reported it incorrectly.</p> <p>2. Suggested Text to be added to instructions: “Do not include amounts in Box 12, code DD.”</p>		
55)	<p>Net Worth of Investments, including Real Estate (Q. 42, 91): 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>	Resolved.	<p>The Notes for questions 42 and 43 (page 4), 45j (page 5), and 91 and 92 (page 7) have been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
56)	<p>Net Worth of Businesses and/or Investment Farms (Q. 43, 92): 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</p>	Resolved. No Change.	<p>The Department of Education believes the current language provides adequate guidance to answer these questions.</p>

	Comment	Status	Resolution
	<p>specific language to this question for parents and students to clarify the definition of “family-owned.”</p> <p>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.”</p>		
57)	<p>First Bachelor’s Degree before July, 1, 2014 (Q. 28): 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>	<p>Resolved. No Change.</p>	<p>The Department of Education considers this suggestion a stylistic preference.</p>
58)	<p>Background: Beginning in January of 2014, many states will be transitioning to an alternative high school equivalency test and will no longer be utilizing the GED. Educational Testing Service (ETS), in partnership with the University of Iowa, has developed the High School Equivalency Test (HiSET). Missouri, Montana and New Hampshire will be using HiSET and will no longer be using the GED as a measure of high school equivalency. Tennessee will be administering both HiSET and GED in 2014, and New York will be using the Test of Assessing Secondary Completion (TASC), developed by CTB McGraw Hill as their high school equivalency assessment. The Higher Education Act language regarding eligibility for financial aid does not reference the GED.</p> <p>It instead uses the term “recognized equivalent certificate.”</p>	<p>Resolved.</p>	<p>The GED response for FAFSA Question 26 has been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
	<p>Unfortunately the actual FAFSA application does make reference to GED in question #26 (see below). ETS would like to ensure that test takers in states that have adopted HiSET as an alternative and wish to apply for financial aid, using the FAFSA, will not be penalized and be allowed to complete the FAFSA form without any confusion.</p> <p>Language from FAFSA Application</p> <p>26. When you begin college in the 2013-2014 school year, what will be your high school completion status?</p> <p>High school diploma. Answer question 27. General Educational Development (GED) certificate. Skip to question 28.</p> <p>Request: In question #26, the term “General Educational Development (GED) certificate” should be replaced with the following: “A state-recognized high school equivalency certificate.” This change is needed to reflect that different high school equivalency assessments will be offered in various states.</p>		
59)	<p>1. It would be helpful if the Middle Initial was required for all students who submitting the FAFSA for the first time or those who are updating their FAFSA from a previous submission. We had several cases where a student had an SSA match due to the fact that the middle initial was missing from their name however, they were able to submit the FAFSA without fill out that filed.</p> <p>2. Also it would be helpful if there was a note on the FAFSA</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved No Change.</p> <p>3. Resolved. No Change.</p>	<p>1. Guidance is given directing the applicant to use their legal name. Since not all applicants have a middle name, requiring this field would prevent those applicants from submitting the FAFSA.</p> <p>2. Question numbers 44e and 44f (student) and 94e and 94f (parent) on the paper FAFSA and on FAFSA on the Web (as well as within</p>

	Comment	Status	Resolution
	<p>encouraging students and parents to double check the amounts pulled in from the Data Retrieval tool- specifically the Untaxed portion of pension and IRA distributions since the data retrieval tool is pulling over Rollovers that do not have to be counted on the FAFSA. This is hurting student's EFC whose parents are switching jobs and only transferred their retirement funding and did not actually receive a distribution.</p> <p>3. I also have been seeing a huge increase in rejected FAFSA forms due to missing asset information. There has to be a way to require parents to answer this question. Do you exceed "yes or no" only and if yes then an amount should be required before submitting since it is based on they day of.</p> <p>4. Also in addition to the new filing status classifications it would be helpful if parents could indicate that they were approved for an extension since that requires that we collect an additional form. For example one of the responses for question 82 could be "Will File- Approved for Extension".</p> <p>5. Finally, for the marital status I think it would be helpful to change "Single" to "Never Married" since we have had several cases of divorced or separated parents selecting the "Single" option.</p>	<p>4. Resolved No Change.</p> <p>5. Resolved</p>	<p>the IRS DRT) currently instruct applicants to “exclude rollovers”. The Department of Education believes this guidance is sufficient.</p> <p>3. Students and parents are required to provide asset information when submitting an online FAFSA unless they meet one of the following criteria:</p> <ul style="list-style-type: none"> • Student is eligible for an automatic zero EFC and reported a state of legal residence that allows the student to skip asset questions • Student meets the simplified needs test and reported a state of legal residence that allows the student to skip asset questions, or • Independent student or parents of a dependent student answered “no” to the “Do your assets exceed...” filtering question. <p>If the student does not meet any of the above criteria, the student (and parents if the student is dependent) must report asset amounts in order to submit the application.</p> <p>4. The Department of Education believes that this scenario applies to a small population of applicants and the recommended change would create confusion.</p> <p>5. The response of “Single” has been reworded to “Never married” for the parents’ marital status question.</p>
60)	1. Page 1. Instructions for Using Your Tax Return updated to	1. Resolved.	1. Currently, the Department of Education

	Comment	Status	Resolution
	<p>indicate "you must correct" estimated tax information.</p> <p>It is unclear whether this is something Financial Aid Administrators will need to monitor or if the Department of Education will monitor this. It should state in the instructions to families that when they are estimating tax information, award amounts based on that estimated data are subject to change. In addition, when corrections are required, it is not necessarily intuitive to students to click on "Make Corrections to a Processed FAFSA."</p> <p>2. This link should be displayed more prominently when students log into FOTW.</p> <p>3. The IRS Data Retrieval instructions should also be updated to make it clear that the IRS is matching their data on their personal information including an exact address.</p> <p>4. The error messages for the IRS DRT are not clear when an address has been typed incorrectly.</p>	<p>No Change.</p> <p>2. Resolved. No Change.</p> <p>3. Resolved. No Change.</p> <p>4. Resolved.</p>	<p>supports the FAFSA correction process by sending notices to students and parents reminding them to correct their estimated tax information once their taxes are filed. Monitoring corrections is the responsibility of the school. Students are encouraged to make corrections whenever necessary on a paper SAR or on FAFSA on the Web. Schools should use their communication channels to do the same.</p> <p>When a student or parent submits a FAFSA on the Web with estimated tax information, the confirmation page displays dynamic text instructing them to "...update the information...reported on the FAFSA to reflect the actual information from the 2013 tax return..." The message then encourages parents and students to use the IRS Data Retrieval Tool when they update the information, if they are eligible. Schools can then use their own award letters to communicate award amounts to the student</p> <p>2. The Department of Education believes that the current layout and links displayed on FAFSA on the Web are appropriate. The current designs, including the links, are based on recent usability studies and customer feedback.</p> <p>3. The Department of Education works closely</p>

	Comment	Status	Resolution
			<p>with the IRS to determine guidance for matching the address for the applicant to be able to use the IRS DRT.</p> <p>4. The Department of Education has been working collaboratively with the IRS to make changes to the IRS Data Retrieval Tool that address these authentication errors. As of August 2013, additional guidance now displays to users who are unable to successfully authenticate with the IRS due to an address mismatch.</p>
61)	<p>Page 3. Questions 24 & 25, parents highest level of schooling</p> <p>This is the first question which indicates Parent 1 & Parent 2, yet this is a unique question because the parents indicated in this question could be different than the parents indicated in other questions. Instructions should be added to state: "Parents in these questions are defined as the student's biological or adoptive parents, not stepparents, guardians, or foster parents."</p>	<p>Resolved. No Change.</p>	<p>Questions 24 & 25 collect information to assist states and schools in awarding student financial assistance. Instructions or definitions beyond the existing statement ("Some states and colleges offer aid based on the level of schooling your parents completed.") were intentionally excluded from these questions since the definition of parent may vary by state.</p>
62)	<p>Pages 4 & 6. Questions 34 & 82, filing status</p> <p>Instructions should indicate where to find this information on a tax return.</p>	<p>Resolved.</p>	<p>Questions 34 and 82 have been reworded for clarity.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
63)	<p>Page 6. Question 59, parents marital status</p> <p>1. The wording for unmarried parents living together should</p>	<p>1. Resolved. 2. Resolved.</p>	<p>1, 2 and 3. The Notes and guidance for Question 59 have been revised.</p>

	Comment	Status	Resolution
	<p>be sure to indicate biological or adoptive parents.</p> <p>2. Also, it should be clear which same sex parents should mark this answer.</p> <p>3. If biological parents are divorced and living together, it needs to be clear which option they choose.</p>	3. Resolved.	For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i> .
64)	<p>Page 6 & 7. Questions 61 - 68, Question 88 & 89, parent data</p> <p>Students should have the ability to indicate which parents they are answering these questions about which would help alleviate flip-flopping of parent data.</p>	Resolved. No Change.	When entering data on the FAFSA, either on paper or on the Web, it does not matter if the student (or the parent) inadvertently flip-flops the information for the two parents. This would have no effect on the EFC calculation.
65)	<p>Page 9. Notes for Step Four, questions 59-94, who is considered a parent</p> <p>It would help to include examples. Students, parents, and financial aid administrators are having to re-learn who will be considered a parent, and examples help clarify this.</p>	Resolved.	Due to the scope of the definition of who is considered a parent, the Department of Education is unable to provide examples on the paper FAFSA. However, further guidance and examples will be provided through other official means.
66)	<p>From reviewing the paper FAFSA, it is unclear what, if any, additional logic will be added to FOTW to help students navigate through the new method of collecting parental information.</p> <p>1. For example, if filing status is inconsistent with marital status, will an edit catch this?</p> <p>2. Will there be a way to track that Parent 1 and Parent 2 are used consistently?</p>	<p>1. Resolved.</p> <p>2. Resolved.</p>	<p>1. FAFSA on the Web logic will compare the marital status and tax filing status. If a conflict occurs, an edit and a SAR comment will notify the applicant, and an ISIR comment will notify the Financial Aid Administrator.</p> <p>2. Refer to comment #64 for resolution.</p>
67)	<p>We appreciate the efforts of the Department of Education to address all family structures; however, we feel there is still ambiguity in the instructions provided to students and parents. The instructions for “unmarried and both parents</p>	Resolved.	The Notes and guidance for “unmarried and both parents living together” have been revised.

	Comment	Status	Resolution
	living together,” direct families to contact 1-800-4FED-AID for assistance. Students or parents may be unwilling to go this extra step without first receiving guidance on what this answer means, and they might interpret this to mean a parent’s boyfriend/girlfriend who is not a biological or adoptive parent to the student. We recommend providing examples of parents who fit this scenario as well as examples of what situations do not fit this scenario.		For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i> .
68)	<p>1. Regarding the Parent 1 and Parent 2 questions, with the capabilities of FAFSA on the Web, it could ease a lot of burden by asking students to identify the relationship of each parent for whom they are providing information. When marital status is divorced, FOTW asks the student to indicate if they are providing information for mother or father. This could be updated to have a dropdown for both parents indicating biological/adoptive/step and mother/father, based on the marital status selected. Also, some step-parents feel they should not be included on the FAFSA, and some students think they should answer about biological, divorced parents even if they are not living together.</p> <p>2. Please make sure it is clear that answers for Parent 1 and Parent 2 are for parents in the student’s household.</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved.</p>	<p>1. The simplified FAFSA on the Web is a result of continuous feedback from the community and in accordance with the rules in the current Higher Education Act (HEA).</p> <p>2. The Department will provide further guidance and resources to assist in answering the parent questions on the 2014-2015 FAFSA.</p>
69)	Now that the Supreme Court has issued a ruling on the Defense of Marriage Act (DOMA), the financial aid community will need to understand how this affects collection of information on the FAFSA, not just for parents, but for students who are the same gender and married.	Resolved.	<p>The Notes for questions 16 and 17 (page 3) and the Notes for Step Four, questions 59-94 (pages 6 and 7) have been revised to reflect new guidance.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
70)	<p>We applaud the Department of Education (ED) for acknowledging today's changing family structures by collecting information on the FAFSA from legal parents who live together, regardless of marital status or gender. This is a positive step for both the simplicity and integrity of the federal aid process; by more accurately capturing what families headed by two legal parents can pay, we continue to emphasize that the primary responsibility to pay for college rests first with the family. We assume that further changes will be required to the FAFSA as a result of the recent Supreme Court decision to overturn the Defense of Marriage Act (DOMA). If resulting modifications are made, and timing allows, we encourage you to seek public comment on those changes.</p>	Resolved.	<p>The Notes for questions 16 and 17 (page 3) and the Notes for Step Four, questions 59-94 (pages 6 and 7) have been revised to reflect new guidance.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
71)	<p>We appreciate ED's continued efforts to clarify and improve the FAFSA structure and language, however we believe that you would receive much more useful feedback from the community if you instituted a similar comment process with a similar timeframe for the FAFSA on the Web (FOTW).</p> <p>The vast majority of applicants use FOTW rather than the paper FAFSA and there are more significant changes to FOTW from year to year as compared to the paper FAFSA due to technological changes to skip logic, edits, and other assumptions. It is perplexing that there is no formal mechanism for the aid community to offer suggestions and comments on FOTW.</p>	Resolved. No Change.	Refer to comment #8 for resolution.
72)	<p>Generally, the FOTW demonstration site (www.fafsademo.ed.gov) for the upcoming cycle is not available until mid-December. This late timeframe makes it nearly impossible for the financial aid community to provide</p>	Resolved. No Change.	Refer to comment #8 for resolution.

	Comment	Status	Resolution
	useful feedback in time for ED to make any necessary or desired changes prior to the January 1 start-up date. We ask that you make it a priority to have the demonstration site available to the community for comment at or near the same time you are soliciting comments on the paper FAFSA.		
73)	<p>Page 4. Question 28.</p> <p>Will you have your first bachelor's or professional degree before July 1, 2014 2015? <i>In which year and month did you/will you earn your first bachelor's or professional degree?</i></p> <p>1. Students who complete certain graduate programs that do not require baccalaureate degrees often answer this question "No," making them appear to be Pell-eligible.</p> <p>2. Also, schools report that it is difficult for them to know in a timely manner when students earn their first bachelor's degree during the award year at another institution. These students answer the FAFSA question correctly, yet often have their Pell Grant award revoked late into the award year once the receipt of the bachelor's degree is discovered.</p> <p>The answer to this re-worded Question 28 could be compared to responses to Question 29 and 30, and appropriate edits and/or comments could alert students and schools of possible conflicting information.</p>	<p>1. Resolved.</p> <p>2. Resolved.</p> <p>No Change</p>	<p>1. Refer to comment #5 for resolution.</p> <p>2. Edits currently alert the student when there is a conflict between Question 29 and Question 48. With the wide variety of academic programs offered among institutions, the Department of Education does not believe additional editing is appropriate.</p>
74)	<p>Page 5 & 7. Questions 45a & 93a.</p> <p>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</p>	<p>1. Resolved.</p> <p>2. Resolved.</p>	<p>1. Refer to comment #54 for resolution.</p> <p>2. Refer to comment #15 for resolution.</p>

	Comment	Status	Resolution
	<p>Boxes 12a through 12d, codes D, E, F, G, H and S. Do not include amounts in Box 12, code DD.</p> <p>1. Financial aid administrators report that this question is prone to underreporting, most likely because many families do not consider their contributions to retirement plans as payments to “pension and savings plans”. Adding the word “retirement” would clarify what is to be included.</p> <p>2. In the 2013-14 application year, many students/parents incorrectly included amounts from W-2 form, Box 12, code DD as untaxed income. Box 12 code DD reports the cost of employer-sponsored health coverage and was intended to be informational only per the IRS instructions.</p>		
75)	<p>Page 6. Question 59.</p> <p>As of today, what is the marital status of your legal parents? <input type="checkbox"/> Never Married <input type="checkbox"/> Unmarried and both parents living together <input type="checkbox"/> Married or Remarried <input type="checkbox"/> Divorced or separated <input type="checkbox"/> Widowed</p> <p>In certain circumstances, both the first and second options are applicable – how would the student decide which to select?</p> <p>Since legal parents are defined in the introductory text to this question as “biological and/or adoptive parents”, this question can be misinterpreted to mean that stepparent information is not required on the FAFSA. For example, John’s biological parents are divorced and remarried to</p>	<p>Resolved. No Change.</p>	<p>The responses to this question were re-ordered to intentionally display the Never married option first.</p> <p>The Department believes that the existing guidance for this question (“If your parent was never married or is remarried, divorced, separated or widowed, see Notes page 9 for additional instructions.”) addresses this comment.</p> <p>In addition, the Notes on page 9 have been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
	<p>other people. Since “legal parents” refers to biological parents, he could reasonably read this question as asking about the status of his two biological parents, leading him to answer “divorced or separated” instead of “married or remarried”. There is further instruction on page 9 related to divorced parents, but we suggest that some additional instruction be added to near the question itself, as the addition of the term “legal parent” and its definition is likely to create some confusion.</p>		
76)	<p>Page 6. Questions 80, 81, 82.</p> <p>For 2013, have your parents completed their IRS income tax return or another tax return listed in question 81?</p> <p>What income tax return did your parents file or will they file for 2013?</p> <p>What is or will be your parents’ tax filing status for 2013?</p> <p>None of these questions has appropriate response options in situations where two parents are included on the FAFSA, but their responses to these questions may differ. These situations are more likely to occur in light of changes on reporting of parental information on the FAFSA.</p>	Resolved.	<p>Help text is being added to FAFSA on the Web to clarify exactly what parents and students should enter in this situation.</p> <p>Additionally, text in the “Using Your Tax Return” section on page 1 of the paper FAFSA has been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
77)	<p>Page 9. Notes for Step Four, questions 59-94</p> <p>Additional instructions about who is considered a parent on this form:</p> <ul style="list-style-type: none"> • If your parent was never married or is widowed, answer the questions about that parent.... 	Resolved.	<p>The Notes for Step Four, questions 59–94 (pages 6 and 7) have been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
	<ul style="list-style-type: none"> • If your parents are not married to each other and live together, select “Unmarried and both parents are living together” and provide information about them. Contact 1-800-4FED-AID for assistance completing questions 80-94. <p>For unmarried parents, the first and last bullets can sometimes be contradictory. It appears that the last bullet in the instructions was added as a result of the change in reporting of parental information on the FAFSA, but necessary modifications to the first bullet were overlooked.</p>		
78)	<p>Page 10. Notes for Questions 35 and 84</p> <p>If you filed a 1040 and were not required to file a tax return other than to claim a refund of withheld tax, answer “Yes” to this question.</p> <p>An individual who must file a return to claim a refund of withholdings might misinterpret this instruction. Adding “other than to claim a refund of withheld tax” after “return” would help clarify.</p>	Resolved. No Change.	The Department of Education believes this recommendation would change the meaning of the instructions, as there are additional reasons why someone might file a 1040 even though they are not required to file a tax return.
79)	<p>Page 11. Question 26</p> <p>When you begin college in the 2014-2015 school year, what will be your high school completion status?</p> <p>The “homeschooled” option needs more explanation in the instructions. Regulations require either a secondary school completion credential for home school from the student’s state, or if the state has no such requirement, that the schooling occurred in a home school setting exempted from state compulsory attendance requirements.</p>	Resolved. No Change.	The Department of Education believes that the guidance provided is sufficient.

	Comment	Status	Resolution
80)	<p>Page 6. Step 4</p> <p>If your parent was never married or is widowed, divorced, separated or remarried, see the Notes on page 9 for additional instructions.</p> <p>For clarity, insert “or is” after “married,”.</p>	Resolved.	<p>The Step Four text has been revised.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
81)	<p>The purpose of the FAFSA is not to specifically designate a “Mother” and a “Father” for each applicant but rather to learn essential background information about those responsible for the care, health, and welfare of the applicant in question. The gender of the applicant’s parents has no bearing on the information collected and in cases where an applicant has two mothers or two fathers, the use of gendered terms can cause unnecessary delay and potential denial of appropriate financial aid. Applicants with two mothers or fathers face the impossible choice of either arbitrarily designating one parent as “Mother” and one as “Father” or leaving one parent off of the form. In fact before the proposed changes, applicants with same-sex parents were instructed to treat their same-sex parents as divorced and to list only one parent on the form.</p> <p>We approve of the Department’s proposed changes to amend the collection of parental information by adding the response “Unmarried and both parents living together” to the existing responses for the parents’ marital status question. We also approve of the change to use the term “parent” instead of “mother” or “father” where applicable.</p> <p><i>Include explicit instructions for applicants with unmarried</i></p>	Resolved.	<p>The FAFSA will provide appropriate guidance on how applicants should respond to the parents’ marital status questions.</p> <p>For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>

	Comment	Status	Resolution
	<p><i>parents</i></p> <p>We approve of the change to include the new “Unmarried and both parents living together” response where applicable and to provide guidance informing applicants and parents how to input IRS information if the parents filed separate tax returns. We urge the Department to amend the Federal Student Aid (FSA) Handbook, the instructions to the paper FAFSA, and the questions on the FAFSA website to include explicit instructions indicating how applicants with same-sex parents are to fill out these forms. Applicants will have parents in a number of legal configurations: married (see section on the Defense of Marriage Act), in a legally recognized domestic partnership or civil union, or unmarried. There must be clear instructions for applicants with parents in each of these circumstances to understand how to correctly fill out the form.</p>		
82)	<p><i>Include examples of parents who qualify as legal parents</i></p> <p>The Department must also amend the FSA handbook and FAFSA website to answer the question “who is considered a parent?” to include the following information. A parent qualifies as a “legal parent” if he or she is considered such under the state law where the applicant and parents live. Every state has different laws about who is a legal parent; states with comprehensive relationships recognition, such as marriage, civil unions, or domestic partnerships may consider a child of such a relationship the legal child of both parents. It may be unclear to an applicant whether his or her parent qualifies as a “legal parent.” As such, we recommend that the Department include the following guide in the</p>	Resolved.	Once final guidance is available, it will be available through the resources listed.

	Comment	Status	Resolution
	<p>Handbook, the instructions to the form, and the website for applicants who may not know if their parent is a legal parent:</p> <p>A legal parent is anyone who:</p> <p>Is an adoptive parent; or Has a valid court order saying he or she is a parent.</p> <p>Other people who may be a legal parent include:</p> <ul style="list-style-type: none"> • A biological parent, unless they are a sperm or egg donor or a surrogate under state law, or their rights were terminated by a court; • Parents who were married to or in a civil union or registered domestic partnership with a legal parent at the time of birth if the applicant lives in a state that recognizes their relationship; or • In some states, parents who have lived with the applicant and held themselves out as a parent, who were intended parents who conceived the applicant through assisted reproduction, or who qualify under other state laws that recognize them as parents. 		
83)	<p><i>Remove mention of the Defense of Marriage Act</i></p> <p>Clearly, now that the Section Three of the Defense of Marriage Act has been declared unconstitutional by the Supreme Court, there should be no mention of its restrictions on applicants or their parents in the Handbook, the instructions, or the FOTW.</p>	Resolved.	<p>Text referencing the Defense of Marriage Act has been updated to reflect new guidance. Additionally, all “Father” and “Mother” question labels have been replaced with “Parent 1” and “Parent 2.”</p> <p>For more information, see the document</p>

	Comment	Status	Resolution
	<p><i>Remove gendered parent terms</i></p> <p>Now that applicants with married same-sex parents will be able to enter their parents as “married,” as opposed to “unmarried and living together,” we encourage the Department to interrogate whether the gendered parent terms “mother” and “father” retain any relevance. Take for example, an applicant with two mothers. If this applicant lived in Tennessee, where same-sex couples cannot marry, she would chose the appropriate marital status of “unmarried and living together” and be directed to fill in the information for her two “parents.” If the same applicant lived in Massachusetts, which allows same-sex couples to marry, and her mothers were married, she would rightfully chose “married” as their marital status. She would then be directed to complete information on her “mother” and “father,” despite having two married mothers. These gendered terms will lead to the same confusion on the part of applicants and administrators that the current update is seeking to avoid. We strongly recommend that the paper application and the FOTW both reflect the certainty that applicants will be completing information on both of their married, same-sex parents by changing all instances of “mother,” “father,” “step-mother,” and “step-father” to “parent.”</p>		<p>entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student Aid</i>.</p>
84)	<p>The FAFSA form currently requires applicants to indicate their current marital status. An applicant’s response to this question dictates the information requested in 20 subsequent questions which may not be answered if the applicant does not qualify as “married” under the given definition. The purpose of the form is to assess the financial</p>	<p>1. Resolved. 2. Resolved. No Change.</p>	<p>1. Text referencing the Defense of Marriage Act has been updated to reflect new guidance. For more information, see the document entitled <i>Summary of Enhancements to the 2014-2015 Free Application for Federal Student</i></p>

	Comment	Status	Resolution
	<p>status of the applicant to determine eligibility for federal education funding, so the exclusion of legally recognized relationships from the marital status question will lead to confusion for applicants and inaccuracy in calculations. This confusion and inaccuracy can cause delays in the processing of the application and ultimately affect the applicant’s opportunity to receive the financial assistance for which he or she would otherwise qualify.</p> <p>1. <i>Remove mention of the Defense of Marriage Act</i></p> <p>Clearly, now that the Section Three of the Defense of Marriage Act has been declared unconstitutional by the Supreme Court, there should be no mention of its restrictions on applicants in the Handbook, the instructions, or the FOTW.</p> <p>2. <i>Add “legally recognized civil unions or domestic partnerships” to the list of marital statuses.</i></p> <p>We recommend that “legally recognized civil unions or domestic partnerships” be added to the marital status question (16). The language of the form should add options for individuals living in a legally recognized civil union or domestic partnership. Clarifications of these relationships could be added to the instructions if needed. By virtue of the nature of these relationships, the participants are financially intertwined. Despite the Supreme Court’s decision that Section Three of the Defense of Marriage Act is unconstitutional and the federal government, including the Department of Education should be permitted to recognize these valid marriages, 37 states have some restriction on the</p>		<p><i>Aid.</i></p> <p>2. Under the statute, even with the ruling on Section Three of DOMA, individuals in civil unions and domestic partnerships are not considered married for purposes of the FAFSA; these individuals are considered single. These students and parents should continue to report their marital status as something other than married.</p>

	Comment	Status	Resolution
	<p>ability of same-sex partners to access marriage. Seven states offer same-sex couples comprehensive domestic partnerships or civil unions. Applicants in these relationships should be permitted to list their partners on the FAFSA form. This is even more important given the proposed change to allow applicants to list both of their parents, regardless of marital status, if living together. To neglect to extend the same consideration to applicants and their legally recognized spouses may lead to confusion for applicants.</p> <p>We recommend adding “legally recognized civil unions or domestic partnerships” to Question 16. Appropriate amendments to subsequent questions should likewise be amended. For example “husband” and “wife” should be changed to “spouse” or “domestic partner or civil union.”</p> <p>16. What is your marital status as of today? See Notes page 2.</p> <ul style="list-style-type: none"> • I am single. • I am married/remarried. • I am in a legally recognized civil union or domestic partnership. • I am separated. • I am divorced/widowed. 		
85)	<p>Amend information about the Selective Service registration requirement to provide clearer information for transgender applicants.</p> <p>Many transgender applicants would be unable to complete the FAFSA in its proposed form without confusion regarding Questions 21 and 22. We recommend three simple amendments to the proposed form to clarify the application</p>	Forwarded to appropriate business unit.	This comment has been forwarded to the appropriate business unit that reviews policy recommendations.

	Comment	Status	Resolution
	<p>and to hopefully reduce or eliminate delays in processing time for applicants who believe they are exempt from the Selective Service requirement.</p> <p>Recommended Changes</p> <p>Please clarify Question 21 "are you male or female," by instructing applicants to answer according to the gender marker currently associated with their Social Security record. Some transgender applicants may not have a consistent gender marker throughout all government identification systems. In those cases, it would be helpful for the applicant to know which system is being matched against in order to provide an accurate answer and avoid a matching error and subsequent delays in processing the application.</p> <p>In Question 22, add an option to check "I am exempt" next to "Register me!". Transgender men who are listed as male according to social security are currently exempt from registering for the Selective Service. Unlike other men who are exempt from registration, however, they may be unaware of the requirements for documentation, and would not have received any notification from Selective Service in that regard unless they changed their gender marker with the Social Security Administration before turning 18.</p> <p>Rather than burdening applicants to work with each individual institution of higher education to provide appropriate documentation of their exemption from Selective Service registration, the Department of Education</p>		

	Comment	Status	Resolution
	<p>should put all exempt FAFSA applicants on notice of the Selective Service requirement and of the availability of a Status Information Letter.</p> <p>This could be easily achieved by offering an opportunity to identify as a person who believes they are exempt (by checking a box), and by readily providing brief information regarding the availability of Status Information Letters in the notes for Question 22. By doing so, individuals who might have to provide documentation regarding their status would be prompted to take quicker action to compile it. This would also prevent further delays in the financial aid process and would allow for a quicker turnaround time between a failed data match in the Central Processing System and an applicant's satisfactory response to the verification request.</p>		
86)	<p>Allow for a broader range of circumstances under which parental financial information is not required.</p> <p>The current policy surrounding students who are not required to provide parental information is overly restrictive, and leaves out applicants in vulnerable family circumstances. As it stands, students who are homeless or have documentation demonstrating they are at risk of homelessness are exempt from providing financial information. Additionally, students who "have left home due to an abusive family environment" can choose not to provide financial information, but will have to contact school financial aid administrators to "complete the FAFSA." Not only does this leave out students who are currently living in an abusive environment or who lack documentation of their circumstances, it also places an enormous burden on</p>	Forwarded to appropriate business unit.	This comment has been forwarded to the appropriate business unit that reviews policy recommendations.

	Comment	Status	Resolution
	<p>students in vulnerable situations to contact each school financial aid administrator to discuss their circumstances.</p> <p>Across the board, students with negative—but not documented as abusive—relationships with their parents currently have no opportunity to indicate that they may be candidates for a dependency status override. There is also no information on the FAFSA that acknowledges their circumstances or permits omission of parental information, nor is there information that explains the process of obtaining a dependency status override.</p> <p>This policy places an enormous burden on students in unstable situations, and cuts them off from access to more than the promise of an invaluable educational opportunity. For many, it also means cutting off the potential for future shelter, health care, and escape from an abusive community or environment.</p> <p>Among the many students in situations where the pursuit of higher education is a point of negative interaction with their parents are:</p> <p>Female students in families whose parents do not believe higher education is appropriate for women.</p> <p>Religious students whose parents either do not believe in higher education or who would only approve of attendance at specific religious institutions.</p> <p>LGBT students whose parents would refuse to support them</p>		

	Comment	Status	Resolution
	<p>if they came out, both at home or at school.</p> <p>Students who are not yet homeless, but whose parents have indicated that they will not support them after high school.</p> <p>Recommended Change</p> <p>Individuals in these and other similar situations should not have to manage the burden of reaching out to the financial aid administrator at each school to explain their situation and provide differing documentation for a dependency status override that is subject to the professional judgment of each administrator. In furtherance of the President’s belief in higher education as a gateway opportunity, the Department of Education should relieve students in unstable situations from the burden of navigating this process without assistance. This can be achieved by recognizing more circumstances under which parental information need not be provided, and by providing more transparent information about the dependency status override process that is readily available to students filling out the FAFSA.</p> <p>In the long-term, we urge the Department of Education to revisit this policy in favor of a more consumer-friendly approach that gives all students a fair and equal opportunity to have their circumstances considered in the financial aid process.</p>		
87)	<p>Question #16. What is your marital status as of today? – Suggestion: Change the first response option from “I am single” to “I have never been married” so that the wording is comparable to marital status options for parents in #59.</p>	<p>Resolved. No Change.</p>	

	Comment	Status	Resolution
88)	Question #31. Are you interested in being considered for work-study? – Suggestion: In the Instructions section, add an explanation of what work-study is, such as “on- or off-campus student employment.”	Resolved. No Change.	The Department of Education considers this suggestion a stylistic preference.
89)	Questions #37 and #86. Enter your/your parents’ income tax for 2013. – Suggestion: Students and parents have many questions about taxes paid, especially if the student/family has not completed their tax return or needs to estimate taxes paid. Many enter the “tax withheld” amount from the W-2. Instead, provide clearer direction on the difference between "taxes paid" on the tax return and "tax withheld" on the W-2 – especially for those who are estimating their income and taxes paid.	Resolved. No Change.	The Department of Education believes that the guidance in this section of the FAFSA is adequate.
90)	For FOTW, build in an "estimated tax paid" calculator that looks at estimated income, number of exemptions, standard deduction, and standard tax rates. This could be very helpful to families that complete the application with estimated information.	Resolved.	Changes made during the 2013-2014 FAFSA cycle provide more specific guidance to applicants on how to estimate their tax information.
91)	Question #44d. Student’s Additional Financial Information – taxable student grant and scholarship aid – Suggestion: Add the comment, “Consult your tax advisor.”	Resolved. No Change.	The Department of Education considers this suggestion a stylistic preference.
92)	Step Three (Student) – Suggestion: Change the heading by adding “Information” to the parenthetical phrase, as in “(Student Information).”	Resolved. No Change	The Department of Education considers this suggestion a stylistic preference.
93)	Step Four (Parent) – Suggestion: Change the heading by adding “Information” to the parenthetical phrase, as in “(Parent Information).”	Resolved. No Change	The Department of Education considers this suggestion a stylistic preference.