

**2014-2015 Federal Student Aid Application Comments Tracking Summary
(30 Day draft)**

	Comment	Status	Resolution
1	<p>Q.45j “Money received, or paid on your behalf (e.g., bills), not reported elsewhere on this form. This includes money that you received from a non-custodial parent whose information is not reported on this form that is not part of a legal child support agreement. See Notes page 2.”</p> <p>By expanding the scope to include any parent whose information is not reported on the FAFSA, this question would encompass financial support from parents given to independent students, which should also be included.</p>	Resolved	<p>Question 45j will be revised to read: “Money received, or paid on your behalf (e.g., bills), not reported elsewhere on this form. This includes money that you received from a parent whose financial information is not reported on this form and that is not part of a legal child support agreement. See Notes page 2.”</p>
2	<p>The question about having a bachelors degree before July 1, 2014, is too vague and then also too specific.</p> <p>The question says "Will you have your first bachelors degree". I think it should read "Will you have completed your first bachelors degree". Then it gives a date of July 1st, 2014. But many schools have summer semesters that a student could be completing their Bachelors requirements in, and have a bachelors degree completed before the new school year begins. Shouldn't it say prior to the start of the 2014-15 school year? So, all in all, my thought is that the question should read:</p> <p>"Will you have completed your first Bachelors degree prior to the start of the 2014-2015 school year?" Then in the instructions, tell the student that they should contact the school for that student's start date for the school year.</p>	Resolved.	<p>FAFSA on the Web Help text will be updated to clarify this information for applicants. The FAFSA on the Web Help topic “Am I eligible to receive financial aid?” will read:</p> <p>“Many types of federal student aid, such as the Federal Pell Grant or subsidized loans where the government pays the interest while you are in college, also require you to have financial need. Additionally, once you have a bachelor’s degree or a first professional degree, you are generally not eligible for Pell or Federal Supplemental Educational Opportunity Grants (FSEOG).</p> <p>Other requirements may apply. Contact the financial aid office at your college for more information.”</p>

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3	<p>Regarding Revised the "Notes for questions 42 and 43 (page 4), 45j (page 5), and 91 and 92 (page 7)," it states, "Investments include real estate (do not include the home you live in), rental property . . ."</p> <p>To avoid a hanging participle, I would suggest you change the wording, "do not include the home you live in" to "do not include the home in which you live."</p>	Resolved.	The Notes for questions 42 and 43 (page 4), 45j (page 5), and 91 and 92 (page 7) will be revised to read: " Investments include real estate (do not include the home in which you live), rental property (includes a unit within a family home that has its own entrance, kitchen, and bath rented to someone other than a family member), trust funds, UGMA and UTMA accounts, money market funds, mutual funds, certificates of deposit, stocks, stock options, bonds, other securities, installment and land sale contracts (including mortgages held), commodities, etc."
4	<p>In FAFSA instruction "Notes for Step Four, Questions 59-64....", the first bullet note should be changed as needed to ensure proper context around the topics involved.</p> <p>Current wording: "If your parent was never married or is widowed and does not live with your other legal parent, answer the questions about that parent."</p> <p>Suggested wording: "If your parent was never married and does not live with your other legal parent, or if your parent is widowed and not remarried, answer the question about that parent."</p>	Resolved.	The first bullet under the Notes for Step Four, Questions 59-94 (pages 6 and 7) will be revised to read: "If your parent was never married and does not live with your other legal parent, or if your parent is widowed and not remarried, answer the question about that parent."
5	<p>I believe that there needs to be a clarification in the FAFSA with respect to question 59 (parent's marital status). According to Dear Colleague letter GEN-13-12, dependent students whose biological parents live together are required to include both parent's information regardless of marital status. Every year, we get a number of students whose parents are either divorced or legally separated that still live together. It's</p>	Resolved.	The third bullet under the Notes for Step Four, Questions 59-94 (pages 6 and 7), will be revised to read: "If your parents are married, select "Married or remarried." Consistent with the Supreme Court decision holding Section 3 of the Defense of Marriage Act (DOMA) unconstitutional, same-sex couples must report

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	<p>clear that if the parents are divorced, yet still live in the same household, they should file with the new “Unmarried and both parents living together” status, as the instructions explicitly point out. However, it’s not at all clear what they should do if they are legally separated, but still live in the same household. Using the new status wouldn’t be correct, as they are still married, but if they choose the “separated/divorced” category, then only 1 parent’s information will be accepted by the FAFSA on the Web logic. Married would seem to be the most correct choice, but the way the choices are labeled, and the way the instructions are worded, I don't believe most people in this situation would use this. I believe that it would be clearer to include a sentence in the "Married" section of the instructions to indicate that persons in this situation should use this category, such as: "If your legal parents are legally separated but living together, select “Married”, not "Divorced or Separated".</p>		<p>their marital status as married if they were legally married in a state or other jurisdiction (foreign country) that permits same-sex marriage, without regard to where the couple resides. If your legal parents are divorced but living together, select “Unmarried and both parents living together.” If your legal parents are separated but living together, select “Married or remarried,” not “Divorced or separated.”</p>
6	<p>There should be notes/additional clarification for questions #74 and #96 (reporting the number of family members in college), to state that certain military academies as well as certain foreign colleges and universities should not be included. Ideally, families should be provided a link to the list of eligible Title IV institutions that may be counted.</p>	Resolved.	<p>FAFSA on the Web help text will be revised for both the parent and the student to include this information.</p> <p>The parent help topic will read: “Enter the number of people in your parents’ household who will attend college between July 1, 2014 and June 30, 2015.</p> <p>Include:</p> <ul style="list-style-type: none"> ●Yourself, even if you will attend college less than half-time in 2014-2015. ●Other people in your parents’ household only if they will attend college at least half-time in 2014-2015, in a program that leads to a college

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			<p>degree or certificate.</p> <p>Do not include:</p> <ul style="list-style-type: none"> ●Your parents, even if they are enrolled at least half-time in 2014-2015 in a program leading to a degree or a certificate. ●Students at a U.S. service academy, because most of their primary educational expenses are paid for by the federal government.” <p>The student help topic will read: “You must enter the number of people in your household who will attend college between July 1, 2014 and June 30, 2015.</p> <p>Include:</p> <ul style="list-style-type: none"> ●Yourself even if you will attend college less than half-time in 2014-2015. ●Other people in your household only if they will attend college at least half time in 2014-2015, in a program that leads to a college degree or certificate. <p>Do not include:</p> <ul style="list-style-type: none"> ●Students at a U.S. service academy, because most of their primary educational expenses are paid for by the federal government.”
7	Question 28 poses a problem with students earning their bachelor's degree in the Fall. The question asks the student if they will earn a bachelor's before July 1, 2014, but makes no consideration that the student could get their bachelor's just afterwards like in December. Unless the transcripts are	Resolved.	Refer to comment #2 for resolution.

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	submitted a student who answers the question correctly but earns their degree in the Fall and transfers to another school to earn some additional credit would be incorrectly paid pell. Could the question be worded differently or could there be a way for schools to know when a student has earned a bachelor's degree through the clearing house and on the ISIR?		
8	<p>We recommend changing this sentence in the Notes for Step Four section at the top of page 9:</p> <p>Current wording: Additional instructions about who is considered a parent on this form:</p> <p>Proposed wording: Review all instructions below to determine who is considered a parent on this form.</p>	Resolved.	The paper FAFSA will be updated to reflect this change.
9	<p>a. Item # 31. on the FAFSA, I would like to suggest that you add the work "employment" after work-study. We believe this may assist in students understanding that they are to work for this funding.</p> <p>b. For items #80 thru # 83, would it be helpful or necessary to indicate parent 1 and parent 2 given the new inclusion of unmarried parents. Also, will it make a difference as to the order that they complete the answer, if there are two parents for any verification documentation requested/submitted.</p> <p>c. Items #24 and 25, is this impacted by the new parent category?</p>	<p>a. Resolved. No Change.</p> <p>b. Resolved. No Change.</p> <p>c. Resolved.</p>	<p>a. This is a stylistic preference that would make the question redundant. The word "work" already indicates a form of employment.</p> <p>b. Only questions 24, 25, 61-68, 88 and 89 are specific to one parent, and question labels were updated to reflect Parent 1 or Parent 2. All other parent questions apply to one parent or two parents as determined by question 59. The Department of Education believes that to include references to Parent 1 and Parent 2 in questions that didn't previously reference mother or father would add undue burden and decrease readability.</p> <p>c. FAFSA question numbers 24 and 25 are impacted by the category and have been updated to read "Highest school completed by</p>

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			Parent 1” and “Highest school completed by Parent 2”.
10	<p>We recommend the following revisions to Step Four of the paper FAFSA:</p> <p>a. At the top of page 6, 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 you continue, review all Notes on page 9 to determine who is considered a parent on this form.</p> <p>b. Errors in answering questions 80-94 when a student’s parents are “Unmarried and both parents living together” may be highly likely. Therefore, we recommend bolding (in addition to highlighting) the following sentence which immediately precedes question 80 on page 6 to emphasize the need to seek assistance: If your answer to question 59 was “Unmarried and both parents living together,” contact 1-800-4-FED-AID for assistance in answering questions 80-94.</p>	<p>a. Resolved. No Change.</p> <p>b. Resolved.</p>	<p>a. The Department of Education believes that this is repetitive. The current language reads: If your parent was never married, widowed, divorced, separated or remarried, see the Notes on page 9 for additional instructions.</p> <p>b. The text will be bolded as recommended.</p>
11	<p>Q.26 General Educational Development (GED) certificate or state equivalent test.</p> <p>Students may not know what constitutes a state equivalent test in their state. We recommend further instructions directing them to this information.</p>	Forwarded to Appropriate Business Unit	The Department has referred this suggestion to the appropriate business unit to review recommendations.
12	<p>I was recently informed by a counselor that colleges use the FAFSA to deny students admission or limit financial aid. The counselor received this information from this article: http://www.insidehighered.com/news/2013/10/28/colleges-use-fafsa-information-reject-students-and-potentially-lower-financial-aid .</p>	Forwarded to Appropriate Business Unit	The Department has referred this suggestion to the appropriate business unit to review recommendations.

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	Is it possible to deny colleges and universities access to the other colleges students list on their FAFSA?		
13	The new answer option on parent marital status of “unmarried and both parents living together” should also be asked of the student’s marital status. It seems unfair that only dependent parents get put into this group while independent students do not.	Resolved. No Change.	The family contribution for a dependent student is defined in Section 475 of the Higher Education Act, as amended. For each student, the expected family contribution is equal to the parents’ contribution and throughout this section, the parents are referenced without regard to their marital status. It is the relationship of the dependent student to the parents and not the marital status that is significant.
14	<p>Student 4. (Parent Instructions) Answer all the questions in Step Four even if you do not live with your legal parents (your biological and/or adoptive parents). Grandparents, foster parents, legal guardians, aunts and uncles, or other people are not considered parents on this form unless they have legally adopted you. If your legal parents are married to each other or are not married to each other and live together, answer the questions about both of them. If you parent was never married or is remarried, divorced, separated or widowed, see Notes page 9 for additional instructions.</p> <p>Added text expands the scope of who is not considered a parent so the instructions aren’t misinterpreted as allowing people other than those specifically listed to be considered a parent in the absence of legal adoption.</p> <p>These instructions also preclude same-sex stepparents who are legally married to an applicant’s legal parent, but who</p>	Resolved. No Change.	<p>The third bullet under the Notes for Step Four, questions 59-94 (pages 6 and 7) state: “If your parents are married, select “Married or remarried.” Consistent with the Supreme Court decision holding Section 3 of the Defense of Marriage Act (DOMA) unconstitutional, same-sex couples must report their marital status as married if they were legally married in a state or other jurisdiction (foreign country) that permits same-sex marriage, without regard to where the couple resides. If your legal parents are divorced but living together, select “Unmarried and both parents living together.” If your legal parents are separated but living together, select “Married or remarried,” not “Divorced or separated.”</p> <p>When the reported marital status is “Married or remarried,” information for both the parent</p>

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	have not adopted the student, from being included on the FAFSA. Without DOMA guidance from ED, we are unable to determine if this was the intent.		and the stepparent must be reported.
15	Question 16 on the FAFSA for 14-15. Marital Status. The instructions do cover the DOMA act. However, there is no instructions regarding people who may not be married but live together. There was an earlier notice that stated people who live together as the parent and/or student who are contributing to the household income should be included on the FAFSA. So, if, for example, two parents live together but not married and you want both incomes included on the FAFSA, wouldn't you add that in this section so we can catch in the verification process that they live together we will need both Tax transcripts. Otherwise, we would have no way of knowing this.	Resolved. No Change	Question 16 is specific to the student applicant and not the parents. There is no response option of "Unmarried and living together" for the student; this response option exists only for the parent. There is specific guidance contained in bullet 2 under the "Notes for Step Four, questions 59-94 (pages 6 and 7)" on the paper FAFSA for parents who are unmarried and living together.
16	Could suffix be a separate field instead of included in the last name? This will help match ISIRs with data in enterprise systems.	Resolved. No Change.	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.
17	Instructions for 80-94 If your answer to question 59 was "Unmarried and both parents living together," contact 1-800-4-FED-AID for assistance with answering questions 80-94. Clear instructions should be provided on how to answer questions 80-94 and then if students need assistance, they can be directed to contact 1-800-4-FED-AID. Referring all affected students to 1-800-4-FED-AID upfront automatically adds another step for affected applicants and precludes financial	Resolved. No Change.	The current FAFSA instructions for parents who are unmarried and living together state: "If your legal parents (biological and/or adoptive) are not married to each other and live together, select "Unmarried and both parents living together" and provide information about both of them regardless of their gender. Do not include any person who is not married to your parent and who is not a legal or biological parent. Contact 1-800-4-FED-AID for assistance in

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	aid administrators and other advisors from properly counseling applicants, since they don't know what the guidance from 1-800-4-FED-AID will be or if it's accurate.		<p>completing questions 80-94."</p> <p>The instructions direct applicants to include both legal parents who are not married to each other, and to select "Unmarried and both parents living together". The statement to contact 800-4-FED-AID was added to assist in case applicants have additional questions.</p>
18	<p>We recommend the following revision to question 26 on page 3 of the paper FAFSA:</p> <p>Immediately following the question, "When you begin college in the 2014-2015 school year, what will be your high school completion status?", add in parentheses ("None of the above" means you do not have a high school diploma, GED, or equivalent and did not complete secondary school in a home school setting.)</p>	Resolved. No Change.	This is a stylistic preference that would make the response redundant.
19	Based on DCL ID: GEN-13-16 Subject: 2014-2015 Award Year: FAFSA Information to be Verified and Acceptable Documentation, and "Nontax filers-If an institution questions a claim that the tax filer has not, will not, and is not required to file a 2013 Internal Revenue Service (IRS) income tax return, the institution must require the applicant to submit a "Verification of Nonfiling" from the IRS that the tax filer did not file a 2013 IRS income tax return. The request for "Verification of Nonfiling" can be obtained by the tax filer using IRS Form 4506-T and checking box 7. IMPORTANT: According to the IRS, a response to the request for a "Verification of Nonfiling" for the 2013 tax year will not be issued until after June 15, 2014." In light of the length of time that it will take in cases where the institution needs the	Resolved. No change.	The IRS Data Retrieval Tool does not currently include non-tax filer information, and to explore the possibility of obtaining this information would be a collaborative effort between the IRS and the Department of Education. The Department will have conversations to explore this issue.

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	Verification of Nonfiling, it would be beneficial to the student and the institution if the IRS DRT could include an additional flag to indicate verified non-filer status. This may only be possible after the normal tax filing deadline of 4/15/2014, but would be a valuable addition.		