

**2015-2016 Federal Student Aid Application Comments Tracking Summary
(60 Day Comment Period)**

Package/docket ID number ED-2014-ICCD-0126

#	Comment	Commenter	Status	Resolution
1.	<p>In regards to high school completion status, currently question 26 on the 14-15 FAFSA, I would suggest an additional selection option: "Foreign High school that is equivalent to a U.S. High school diploma" or something of that nature.</p> <p>Question 26: https://fafsa.ed.gov/fotw1415/help/diplomaOrGED.htm</p> <p>Many of our students that were educated over seas end up selecting "none of the above" and we then follow up, requesting credit evaluations or other documentation showing it is a HS degree that is equivalent to a US high school diploma. While the full language of the current options mention equivalency many students interpret it as U.S. only and think, due to attending HS overseas, they should be answering none of the above.</p> <p>Additionally, this would allow us to query these students out and assign specific documentation should we need it or the DOE request we collect it.</p>	Thaddeus Paskert, Benedictine University, Lisle, IL	Resolved.	<p>The Department of Education will modify <i>FAFSA on the Web</i>SM help text to clarify which option a student should select if he/she received or will receive a foreign high school diploma. Updated text will read:</p> <p>“High school diploma means you have received or will receive a U.S. high school diploma before the first date of your enrollment in college or you have received or will receive a foreign school diploma that is equivalent to a U.S. high school diploma before the first date of your enrollment in college.”</p>
2.	<p>The online FAFSA instructions pertaining to untaxed income need to be improved. More specifically, FAFSA-filers frequently do not respond to these questions because they incorrectly assume the questions do not apply to them. The most common example observed is failing to report contributions to a tax deferred pension or savings plan, such as a 401(k) or 403(b). A possible solution is to simply list examples under each untaxed</p>	Anonymous	Forwarded to Appropriate Business Unit.	<p>The Department of Education has referred this recommendation to the appropriate business unit for review.</p>

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	income question, instead of requiring that the question be selected before examples are provided. This seems to be an easy way to help ensure that Federal Pell Grant funding, for example, is extended to the most needy students.			
3.	With 2014-2015 we have seen an increase in students who are confused by the definitions currently used for parents. Many now think they are supposed to report only for biological parents and neglect to add information about step-parent living in the household.	Anonymous	Resolved.	The Department of Education has created an infographic to assist dependent applicants in the determination of which parent(s) to report on the <i>Free Application for Federal Student Aid (FAFSA®)</i> . A link to the new "Who is my parent when I fill out my FAFSA?" infographic will be added to the "Who is considered a parent?" help topic in <i>FAFSA on the WebSM</i> .
4.	Is there a way to require all applicants to complete the Household Size Worksheet without first asking them for their number of family members for the academic year? The words "number in family" and "household size" are interpreted differently, and many, many students infer this to mean themselves and their roommates, not anything regarding whom their parents are supporting.	Alicia Goodwin, South Mountain CC, Phoenix, AZ	Resolved. No Change.	The Household Size Worksheet is not a form that can be submitted to the Central Processing System (CPS) for processing, and therefore cannot be required.
5.	<p>1. Years ago there was talk at the FSA conference in the fall regarding the "Scholarships/Grants reported in AGI" question being eliminated. It's still there, and when I've asked at FSA conferences since, no one from the DOE seems to recall that. If it's not something that is being considered at present, I'd like to ask that you consider it for the future.</p> <p>2. Additionally, we see a VERY LARGE number of students with the wrong responses to Questions 29 and 30, due in large part (we believe) the scrolling function for answering that question. If you made it a radio button instead of a scrolling one, the errors should be greatly reduced. We believe the errors exist because the</p>	Anonymous	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. These questions (44d and 93d) are statutorily required because the Higher Education Act excludes taxable amounts of scholarships and grants from total income. To not include these questions would penalize the student.</p> <p>2. The Department of Education considers this suggestion a stylistic preference.</p>

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	student makes the selection by scrolling, then doesn't click off the scroll before scrolling to continue with the application...			
6.	Question 4 on the 2014-2015 FAFSA asks students to give "Your mailing address". This has led to problems for states which use the FAFSA to determine eligibility for state aid. What students do is put down their campus/off campus mailing address which is not their permanent home address. So, an out-of-state student can easily be picked up as a state resident from this address. It is true the student is asked to put their legal state of residence on the FAFSA, but very often they indicate the state of their mailing address. I would suggest rewording this questions to say "Your permanent home mailing address".	Mark French State of CT, Office of Higher Ed, Hartford, CT	Resolved.	Question #4 on the paper <i>Free Application for Federal Student Aid (FAFSA®)</i> has been updated to read: "Your permanent mailing address". The state of legal residence question is meant to capture the applicant's state of legal residence; the mailing address question is only meant to capture the address to which the applicant's mail is sent.
7.	The question about parent marital status often results in erroneous answers. The question is worded as: As of today, what is the marital status of your legal parents? This often results in parents who have remarried as answering "Divorced", as they have divorced the other legal parent. Although the notes do say that if the parent you lived with more has remarried, you should answer with respect to the remarried spouse, many people answer the question incorrectly. Unfortunately, I don't see a simple solution to the problem. The question is complex. However, the way the question is worded now does invite a wrong answer.	Vic Goldberg, U of CO- Boulder, Boulder, CO	Resolved.	<u>Refer to comment #3 for resolution.</u>
8.	In regards to a students dependency status, may we PLEASE make this more plain to departments that	Anonymous	Resolved. No Change.	The references to Special Circumstances on the <i>Free Application for Federal Student Aid (FAFSA®)</i>

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	<p>professional judgment should not be used against one parent of a child or the other. While I understand the financial aspects of raising a child, this child does have two parents and both parents would fall under the independent status, regardless of age.</p>			<p>are limited to questions that determine student dependency status. Other than these references the FAFSA does not provide guidance on any type of professional judgment.</p>
<p>9.</p>	<p>1. Please consider separate answers for marital status question for Divorced or Separated: I am currently divorced I am currently separated For whatever reason this seems to cause quite a bit of confusion for families. If these were separate answers it might reduce the amount of clarification aid offices must seek.</p> <p>2. It would also be nice if there is a pop up information box for those selecting "Head of Household" filing status when not using the DRT. It would inform the applicant that "generally, HH is a filing status that is permissible only for individuals who are considered unmarried as per federal IRS regulations." If an individual uses the DRT that retrieves a HH filing status but has answered "Married" to the marital status question the same thing could occur - alerting the applicant to a possible inconsistency with answers they provided. WE SPENT A LOT OF TIME EXPLAINING AND ADVISING APPLICATIONS TO CORRECT TAX RETURNS DUE TO INCORRECT USE OF THE HEAD OF HOUSEHOLD FILING STATUS! Applicants could research this on their own and possibly file an amended return early on before being advised to do so by a FA administrator.</p>	<p>Anonymous</p>	<p>1. Forwarded to Appropriate Business Unit. 2. Resolved. No Change.</p>	<p>1. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>2. <i>FAFSA on the Web</i>SM (FOTW) currently displays an alert when there is a conflict between the student marital status and the student (and spouse) tax return filing status. This message states: "You said that the student is <marital status> but you also said that the student's tax return filing status is <tax return filing status>."</p> <p>The message then goes on to advise the applicant to change one of their responses, if one is incorrect, before proceeding. If the information is correct, the applicant is advised to make sure that the income information that will be provided on the upcoming pages reflects the applicant's and spouse's 2014 income.</p> <p>Additionally, logic in FOTW prevents married students and parents who report a tax filing status of Head of Household from using the IRS Data Retrieval Tool (IRS DRT).</p>
<p>10.</p>	<p>My comment is also regarding the high school completion question. There needs to be an edit for this question as the blank response does not allow COD to</p>	<p>Wayne Morris, Community College of</p>	<p>Resolved. No Change.</p>	<p>Question #26 on the <i>Free Application for Federal Student Aid</i> (FAFSA[®]) is, in fact, required to be answered online. <i>FAFSA on the Web</i>SM has an edit</p>

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	process the student's aid. It causes many internal processing problems.	Philadelphia Philadelphia, PA		that prompts students to answer this question if they skip it and try to proceed to the next page.
11.	Realizing that it is a common occurrence, the DOE has already initiated the change to include unmarried parents of dependent students who live in the same household. In order to be consistent and fair, the DOE also needs to consider the independent student in the same light. For example, two adults who share a child and live in the same household but are not married are not assessed equally when compared to the current regulations enforced for dependent students.	Anonymous	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.
12.	<p>I would propose different (or more detailed) wording for question #59 on the FAFSA, "As of today, what is the marital status of your legal parents?" in regards to including step parent information if the legal parent you are reporting on the FAFSA is now remarried. Maybe a pop-up box if they choose that their parents are divorced/separated that asks them if the parent they are reporting on the FAFSA is now remarried and then giving details about changing marital status to married and including step parent information.</p> <p>A large number of students are reporting their legal parents marital status as divorced/separated, even though the parent they are using on the FAFSA is now remarried. Hence, they fail to include their step parent name, income and asset information. They are reading "legal parents" to mean their biological parents and not reading further to see that if their legal parent is remarried they should include their step parent. Since the implementation of Comment Codes 361, 362, 363, 364 we have created a form where any FAFSA with these comment codes receives where the students</p>	Tammi Dean U of Northern IA Cedar Falls, IA	Resolved.	<u>Refer to comment #3 for resolution.</u>

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	<p>parents must verify their (the parent) current marital status and their tax filing status. 80% of the respondents to this form must make a correction to their FAFSA to add the step-parent they originally failed to report because they misread question #59 on the FAFSA. We have had about 150 of these forms requested on dependent students parents so far this year. Please consider further, more clear wording in regards to step parents so that we are certain we are awarding financial aid in the appropriate amounts to the correct students without having to collect additional information from the student based on these comment codes being flagged and then making them do revisions to their FAFSA to add their step parent information which almost always increases their EFC.</p>			
13.	<p>In regards to the parents' marital status, changing the wording from previous FAFSA's of "What is your parents' marital status as of today?" to the wording on the 14-15 FAFSA of "As of today, what is the marital status of your legal parents?" has caused a lot of parental information reported incorrectly on the 14-15 ISIR's we have received. Many students and/or their parent takes the wording "legal parent" to mean the student's birth mother and birth father. We've had numerous parents report their marital status as never married because the birth parents did not marry. However, through the verification process we have found the parent reporting financial information on the FAFSA has married since the birth of the student but is not reporting their marital status correctly due to the term "legal parent" and therefore not reporting spouse income information. A number of students have gone from an EFC of 0 to showing no financial need once we've completed the verification process.</p>	Anonymous	Resolved.	<u>Refer to comment #3 for resolution.</u>

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	<p>As a financial aid administrator I feel we would get more accurate information if the wording on the 15-16 FAFSA was changed back to the wording prior to the 14-15 FAFSA.</p>			
14.	<p>Please make suffix to be a separate field. FAM systems that match on last name skip students with the suffix included in their last name. The records then need to be matched and loaded manually. For larger schools, this can very challenging and time consuming. This change will allow ISIR records to match demographic information at the institutions automatically and expedite the FA process for students.</p>	Andrea Cipolla	Resolved. No Change.	<p>Spacing limitations prevent this from being included on the paper version of the <i>Free Application for Federal Student Aid (FAFSA®)</i>. Each year, third party software providers are given Federal Student Aid (FSA) specifications for Institutional Student Information Record (ISIR) processing.</p>
15.	<p>On fafsa.ed.gov, in order to determine if the IRS data retrieval (DRT) feature can be used, students and parents are prompted with preliminary questions, including one asking if they have amended their taxes. A significant amount of the population does not know what the word amended means, so they select the option that they have amended their taxes. By choosing this option, the FAFSA denies the parent/student access to the IRS DRT.</p> <p>Schools receive a IRS DRT display code of H on these students which creates a concern/ conflicting information in the file that can only be resolved by asking for an amended tax return (1040X) from the parent/student in addition to the original tax transcript. It is at this point that we learn that the parent/student does not know what the word amended means.</p> <p>Revised wording defining the meaning of amending taxes, stated in terms of having filed a 1040X may clarify this question and help parents/students choose their</p>	Robert Voytek Coconino CC Flagstaff, AZ	Resolved.	<p>The Department of Education will update the existing filtering questions and help text on <i>FAFSA on the WebSM</i> to better define the term “amended tax return.” Specifically, the student filtering question will be updated to read:</p> <p>“Did you file a Form 1040X amended tax return?”</p> <p>The parent filtering question will be updated to read:</p> <p>“Did you, the parents/father/mother, file a Form 1040X amended tax return?”</p> <p>Additionally, “The Form 1040X is used to correct your original filed tax return.” will be added to the help text.</p>

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	answer correctly.			
16.	<p>I'm suggesting a change in the wording of the first two sentences of the second paragraph in Step Seven as follows: "If you are the parent or the student, by signing this application you certify that the information you provided is true and complete to the best of your knowledge, and that any income estimates you provided were based on the best available information and made in good faith. You also agree, if asked, to verify the accuracy of your completed form by providing information that may include data from U.S. or state income tax forms that you filed or are required to file, and records of assets held on the date that you submitted the form."</p> <p>This change would make clear that income estimates are acceptable, and that assets are a potentially important part of aid eligibility determination.</p>		Resolved. No Change.	The Department of Education believes the suggested change would affect the legal substance of the certification statement.
17.	<p>1. The second-person language needs to be changed to third-person throughout the entire FAFSA.</p> <p>2. Also, Parent 1 and Parent 2 should be changed to Parent/Step-parent 1 and Parent/Step-parent 2.</p>	Ben Kohl Kansas State University Manhattan, KS	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The Department of Education considers this suggestion a stylistic preference.</p> <p>2. The Department of Education believes the current labels provide adequate description, and that the addition of this text changes the meaning of the term. The suggested change would cause confusion since the stepparent status only applies if the selected marital status is "Married or remarried".</p>
18.	<p>The following answer set should replace the vague answer of college when asking parental level of educational attainment: Some college, but no degree; Associates degree; Bachelors degree; Masters degree; Doctoral degree</p> <p>By including this data, students eligible for many first-generation services, scholarships and awards - given that</p>	Anonymous	Resolved. No Change.	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 states and schools use the

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	<p>such programs have differing definitions of "first-generation" it comes to parental educational level - will be more easily identified and presented such opportunities and the need for and efficacy of such programs and services may be more easily evaluated.</p>			<p>data collected in different ways.</p>
<p>19.</p>	<p>1. I tried to fill out the form in Adobe and couldn't. I then used my Adobe Professional form wizard to automatically convert it to a form I could fill out on my screen with only partial success. I would suggest you make sure the form works well with the Adobe form functions and other common software that would allow it to be filled out on a screen. There will be some people who don't want to do it or can't do it online but who would still benefit from doing the form electronically.</p> <p>2. I think the language could be further simplified to reduce the amount of text people have to process and replace more difficult words and phrases with simpler ones. I made some changes in the attached as examples, but did not go through all the instructions.</p> <p>3. The state financial aid deadline information should be on a separate page. It's important, but makes the first page very crowded.</p> <p>4. In the instructions, I wonder if there is a way to separate the instructions that many filers will need from the information that only a small minority of filers would need to read, so that it doesn't look so complicated for the vast majority of filers. Perhaps there could be a page</p>	<p>Nate Johnson Postsecondary Analytics, LLC Tallahassee, FL</p>	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p> <p>3. Forwarded to Appropriate Business Unit.</p> <p>4. Resolved. No Change.</p>	<p>1. The version of the <i>Free Application for Federal Student Aid</i> (FAFSA®) posted for public comment is intended as a draft, and is not the fillable PDF. The fillable PDF form will be available on <i>FAFSA on the Web</i>SM on January 1, 2015.</p> <p>2. The Department of Education considers these suggestions stylistic preferences. Additionally, the Department is required by law to use Plain Language (also called Plain English) in order to communicate clearly and effectively with the intended audience. The <i>Free Application for Federal Student Aid</i> (FAFSA®) is written using Plain Language.</p> <p>3. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>4. The Department of Education considers this suggestion a stylistic preference.</p>

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	<p>of additional instructions at the end that most people could ignore, but filers from Micronesia, etc. would refer to. Obviously this is much easier to handle with online logic, but perhaps something similar could be done on paper.</p>			
20.	<p>Comments on 2015-2016 FAFSA (PDF)</p> <ol style="list-style-type: none"> 1. We recommend reconfiguring the header of the form so that the word “FREE” in “FREE APPLICATION for FEDERAL STUDENT AID” can be bigger. This will emphasize to applicants that the FAFSA is a free form and can be completed without professional assistance. 2. We recommend breaking up the “Filling Out the FAFSA” section into several sections, to draw more attention to them. One would be labeled “Free Help Completing the FAFSA” and one would be labeled “Special Circumstances”. 3. We recommend changing the headlines on the first page to read “Apply by the Deadlines” and “Mail Your FAFSA” instead of “Applying by the Deadlines” and “Mailing Your FAFSA” so that it is a command and more forceful. 4. The fine print at the bottom of the page makes reference to two registered trademarks. But there is no registered trademark symbol (®) on the Federal Student Aid logo and the “Proud Sponsor” trademark is not mentioned. 5. On page 2, Notes for questions 42 and 43, there is 	<p>Mark Kantrowitz and David Levy of Edvisors.com.</p>	<ol style="list-style-type: none"> 1. Resolved. No Change. 2. Resolved. No Change. 3. Resolved. No Change. 4. Resolved. No Change. 5. Resolved. No Change. 6. Resolved. 7. Resolved. 8. Resolved. 9. Resolved. 10. Resolved. 11. Resolved. No Change. 	<ol style="list-style-type: none"> 1. The Department of Education considers this suggestion a stylistic preference. 2. The Department of Education considers this suggestion a stylistic preference. 3. The Department of Education considers this suggestion a stylistic preference. 4. The Proud Sponsor text is part of the Federal Student Aid logo. The trademark symbol is to the right of the logo. 5. Accounts owned by the student are reported as a student asset, and accounts owned by the parent are reported as a parent asset. The existing notes and help text are correct. 6. On page 2, the Notes for questions 42 and 43 (page 4), 45j (page 5), and 91 and 92 (page 7) have been updated to read: “Money received, or paid on your behalf, also includes distributions to you (the student beneficiary) from a 529 plan that is owned by someone other than you or your parents (such as your grandparents, aunts, uncles, and non-custodial parents). You must include these

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	<p>good information about reporting “all accounts owned by the student and all accounts owned by the parents”. A frequent question that is not answered here or in the AVG is whether custodial 529 plan accounts owned by the student’s sibling should or should not be reported. If such sibling-owned 529 plan accounts are not reported on the student’s FAFSA (of course, they are reported as parent assets on the sibling’s FAFSA), it creates a loophole that can cause some assets to be disregarded.</p> <p>6. On page 2, Notes for questions 42 and 43, Money received, or paid on your behalf, the text is ambiguous as to what happens if the distributions are made to the account owner as opposed to the beneficiary. Since this is cash support (e.g., payment of college costs), it should be reported as untaxed income to the student. But the current narrow wording is ambiguous enough that some applicants might think that distributions should not be reported if the check was made payable to the account owner instead of the beneficiary.</p> <p>7. Question 4. The intent of this question is to ask for the student’s permanent home address. Yet the wording “Your mailing address” causes confusion, leading some students to list their campus mailing address. To the extent that some states use this address to determine eligibility for state aid, instead of the answer to question 18, it can cause problems. Perhaps add “(permanent home address)” after “Your mailing address”?</p> <p>8. Question 16/59 (marital status). The current question design is likely to cause confusion, partly because of the apparent overlap among answers. For example, if the</p>		<p>12. Resolved. No Change.</p> <p>13. Resolved. No Change.</p> <p>14. Resolved. No Change.</p> <p>15. Resolved.</p> <p>16. Resolved. No Change.</p> <p>17. Resolved.</p> <p>18. Resolved.</p> <p>19. Resolved.</p> <p>20. Resolved.</p> <p>21. Resolved. No Change.</p> <p>22. Resolved. No Change.</p> <p>23. Resolved. No Change.</p>	<p>distribution amounts in question 45j.”</p> <p>7. <u>Refer to comment #6 for resolution.</u></p> <p>8. <u>Refer to comment #3 for resolution.</u></p> <p>9. Step Four (Parent) on the <i>Free Application for Federal Student Aid (FAFSA®)</i> has been updated to better define parent:</p> <p>“Answer all the questions in Step Four even if you do not live with your legal parents (biological, adoptive, or as determined by the state [for example, if the parent is listed on the birth certificate]). Grandparents, foster parents, legal guardians, widowed stepparents, aunts and uncles are not considered parents on this form unless they have legally adopted you.”</p> <p>Help text on <i>FAFSA on the Web</i>SM has been revised to:</p> <p>“A legal parent includes a biological or adoptive parent, or a person that the state has determined to be your parent (for example, when a state allows another person’s name to be listed as a parent on a birth certificate). Grandparents, foster parents, legal guardians, older brothers or sisters, widowed stepparents, and aunts and uncles are not considered parents unless they have legally adopted you.”</p> <p>10. Question #20 has been updated to read:</p>

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	<p>parents were never married they are also unmarried. Likewise, if they are divorced they are unmarried but in some circumstances separated might still be considered to be married. Or the parents might be divorced but since then have remarried (e.g., better emphasis on current marital status). Also, there needs to be clarification that separated can include legal separation and information separation, with a requirement that parents who have an informal separation cannot cohabit. It might be better to enumerate all of the possible combinations with consistent terminology or to split it into two questions, one about marital status and one about whether the parents live together. The instructions for question 59 should start with a definition of legal parent before discussing who is considered a parent on the form, instead of burying the definition in one of the bullets. Also, there is potential for confusion if the applicant thinks that the question is asking about the current marital status of just the biological parents to each other and not whether the custodial parent has subsequently remarried. This question needs to be rewritten in a way that minimizes opportunities for confusion.</p> <p>9. The FAFSA continues to treat students whose parents are in a same-sex marriage differently than students whose parents are in an opposite-sex marriage. If the student’s parents were married at the time of the student’s birth and the biological mother subsequently dies, the other parent is treated as a biological parent if the parents were of the opposite sex and as a stepparent if the parents were of the same sex, even if the birth mother had an affair. Is biological implicitly being</p>			<p>“If the answer to question 19 is “No,” give month and year you became a legal resident of that state.”</p> <p>11. <u>Refer to comment #18 for resolution.</u></p> <p>12. <u>Refer to comment #18 for resolution.</u></p> <p>13. Because of the complexity of the Internal Revenue Code in this area and the limited number of applicants who may be impacted, the Department of Education is not making any changes in order to avoid unnecessarily complicating the process for most applicants.</p> <p>14. The Department of Education believes the current language provides adequate guidance to answer these questions.</p> <p>15. A comma has been added after the word “other” so the statement reads:</p> <p>“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.”</p> <p>16. The Department of Education considers this suggestion a stylistic preference.</p> <p>17. Question #74 has been updated to include the text:</p> <p>“Do not include siblings who are in U.S. military service academies.”</p>

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	<p>defined as the parents listed on the birth certificate? If so, this should be clarified, as there are a half-dozen states that allow same-sex parents to both be listed on the child’s birth certificate.</p> <p>The FAFSA also does not adequately address surrogacy and donated genetic material. If two male same-sex parents have their genetic material mixed together with donated ova that are then used to artificially inseminate a surrogate, who exactly is considered to be a biological parent? The surrogate? The unknown woman who donated the ova? One or both of the male parents? The doctor who performed artificial insemination on the surrogate?</p> <p>10. Question 20: Add wording: If the answer to question 19 is “No,” give month and year you became a legal resident of that state.” Otherwise, eligible non-citizens may be confused by the question and think it applies to federal residency and not state residency.</p> <p>11. Question 24/25: Add in Parentheses: Parent 1 (Father/Mother/Stepparent), Parent 2 (Father/Mother/Stepparent) as shown in Questions 61 and 65.</p> <p>12. On the form, questions 24 and 25, people often get confused about the “College or beyond” answer as to whether it includes a certificate or Associate’s degree or just a Bachelor’s degree or more advanced degree. It’s supposed to be just a Bachelor’s degree or better. Perhaps the instructions should mention this? Or perhaps all of the possible degree levels should be mentioned so that the responses are more specific (e.g.,</p>			<p>18. The language in this section has been updated to read:</p> <p>“You use the FAFSA to apply for federal student aid, such as grants, work-study and loans.”</p> <p>19. The <i>Student Aid Report</i> (SAR) has been updated to read:</p> <p>“Review the data on pages 2 and 3.”</p> <p>20. The text in this section has been updated to read:</p> <p>“Financial aid may include grants (free funds that do not have to be repaid), work-study (paid part-time employment), and/or low-interest loans (borrowed funds that must be repaid).”</p> <p>21. 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 <i>Student Aid Report</i> (SAR) is only an example.</p> <p>22. The information provided is generic information; each student’s situation is different.</p> <p>23. The Department of Education uses skip logic in combination with other functions in <i>FAFSA on the Web</i>SM to present applicants with the appropriate questions needed to complete the form. The skip</p>

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	<p>some college, no degree; certificate; Associate’s degree; Bachelor’s degree).</p> <p>13. Questions 39, 40, 88 and 89 still do not accurately describe income earned from work. They omit partnership income (line 17 of the 1040), exclude retirement plan contributions, include taxable scholarships and fellowships (which are not subject to FICA) and include the employer FICA contribution. A more accurate approach would add box 5 of the W-2 statement to line A.4 or B.6 of Schedule SE.</p> <p>14. Questions 43/92: Add more clarifying language to family business (that is owned and controlled by the family and clarification that family must own more than 50% of the business).</p> <p>15. The instructions for Step Four should probably have a comma after “other” in “If your legal parents are married to each other or are not married to each other and live together…” for clarity. The correct scoping is (A OR (B and C)) but without the comma it is prone to misinterpretation as ((A OR B) and C).</p> <p>16. Question 69: Simplify language to: “If you provide your parents’ email address, we will let them know when your FAFSA has been processed.”</p> <p>17. Question 74: add language, “Do not include siblings who are in U.S. military service academies.”</p> <p>18. Page 10: Change language order in section, “Why Fill out a Fafsa?” from “You use the FAFSA to apply for</p>			<p>logic aids in the reduction of the individual application burden, which is defined as the time it takes an applicant to prepare, complete and submit the <i>Free Application for Federal Student Aid</i> (FAFSA®) and/or correction.</p>

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	<p>federal student aid, such as grants, loans and work-study.” to “ You use the FAFSA to apply for federal student aid, such as grants, loans and work-study.” This will then match the order of wording on Page 1, “Use this form to apply free for grants, work-study and loans.” Also, it will deemphasize loan aid, the least desirable type of aid.</p> <p>Comments on 2015-2016 SAR/SAR Acknowledgment (PDF)</p> <p>19. Page 1: Change language in first box from, “ Review the data on page 2 and 3.” to “Review the data on pages 2 and 3.”</p> <p>20. In the section, “Federal Student Aid Eligibility (review the checked boxes),” in first paragraph, change order of types of aid from, “Financial aid may include grants (free funds that do not have to be repaid), low-interest loans (borrowed funds that must be repaid), and/or work-study (paid part-time employment).” to “Financial aid may include grants (free funds that do not have to be repaid), work-study (paid part-time employment), and/or low-interest loans (borrowed funds that must be repaid).” Again, this deemphasizes loan aid.</p> <p>21. On page 4 of the SAR, it gives \$10.61 per \$1,000 for an assumed interest rate of 5%. It might be better to give a range of amounts without assuming any particular interest rate given that borrowers are likely to have a range of interest rates.</p> <p>22. Also on page 4 of the SAR, the total amount of loans</p>			

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	<p>outstanding information is not very useful. First, there needs to be a bottom line that gives the overall total for each column. Second, the SAR should report the monthly payments assuming a 10-year repayment term for the overall total in this table somewhere prominently. The overall total and the corresponding monthly payment might help encourage students to borrow less by increasing their awareness of their debt and the monthly cost of that debt. Even better would be to project the amount of debt at graduation (based on the current borrowing rate) and the corresponding monthly payments. This can be labeled an estimate, but will help borrowers realize the need to minimize debt.</p> <p>General Comment</p> <p>23. The purpose of skip logic is to reduce the number of questions that must be answered by applicants. However, to implement skip logic, the form must ask additional questions. Thus, some forms of skip logic reduce the number of questions answered by some applicants and increase the number of questions that must be answered by applicants who do not satisfy the requirements for skip logic. The U.S. Department of Education should disclose data whether this results in a net decrease in the total number of questions that must be answered by applicants, on average, as well as whether this results in a reduction in the complexity of the questions that must be answered or increase in the accuracy. For example, the simplified needs test eliminates the need to answer six questions about assets, but more questions are required to determine eligibility for the simplified needs test. Likewise, the</p>			

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	<p>questions needed to enable use of the IRS Data Retrieval Tool may not yield much net simplification of the form, although they do improve the accuracy of the form. <u>Back to Beginning of this comment 20.</u></p>			
21.1.	<p>While the paper FAFSA, which is mainly no longer used, requires students/parents to indicate means tested benefits if received, the skip logic on FAFSA On The Web usually passes over these questions. This can result in many families being asked by the student's school(s) requesting additional documents to determine how the household is supported. Altering the skip logic to require answers to these questions should the household indicate no other income would relieve this obligation both of the household and the aid office.</p> <p>2. Also, the auto-zero EFC often excluded the dependent student from reporting his/her income, again through the skip logic, and, again, may require the student to respond for income documentation from students selected for verification. Altering the skip logic to allow for this information to be input would relieve this. While it will require additional input on the application, it may make the process faster on the other end.</p>	Michelle McCrillis Quinsigamond CC Worcester, MA	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p>	<p>1. The skip logic used in <i>FAFSA on the Web</i>SM is designed to present the parent or independent student with the means tested Federal Benefits questions only when necessary to determine eligibility for the Simplified Needs Test or Automatic Zero EFC calculation. These questions are displayed specifically for parents of dependent students or independent students with an AGI less than \$50,000 whose Tax Return Status is "Already Completed" or "Will File" AND Tax Return Type is "IRS 1040" or "A Foreign Tax Return" AND Dislocated Worker status is "No" or "Don't Know."</p> <p>2. The Department of Education has stated that, in cases where the dependent student has qualified for an Automatic Zero EFC and has been allowed to skip certain financial questions due to the <i>FAFSA on the Web</i>SM skip logic, most financial items do not need to be verified. Please see the Program Integrity Questions and Answers Verification – Archived Guidance, VI-Q5/VI-A5, located here: http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification-archive.html</p>
22.	<p>Under question 32 - 35, it would help to include Spouse in these questions as students often get confused. They think if those questions are only asking about the student, then they often do not include the spouse income even though the instructions ask them to. This creates additional verification and corrections thus</p>	Ruth Lopez National University San Diego, CA	Resolved. No Change.	The Department of Education believes the instructions that directly precede these questions provide adequate guidance.

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	delays.			
23.	<p>The FAFSA needs to be more clear about the parents' marital status question.</p> <p>What is your parents marital status as of today? Students see the word parents and think biological so they mark them as divorced even if one of them has remarried. I realize there is a note for additional instructions but no one seems to read that.</p> <p>Maybe there should be an additional question like, If your parents are divorced, has the parent you currently live with remarried?</p>	Courtney Henderson	Resolved.	<u>Refer to comment #3 for resolution.</u>
24.	<p>Question 59: As of today, what is the marital status of your legal parents? This question results in many incorrect answers and misunderstandings. A better wording may be: What is the marital status of the parent(s) reporting information on this form? This wording would mirror the wording above questions 61-68.</p> <p>Also, the status of "Divorced/Separated" should be two separate answers just like student question 16. There divorced and widowed could be merged together. The problem with divorced and separated being the same answer is that it is causing conflicting information with the tax filing status when no conflict may exist. If the parent is separated and filed a married-joint or married-separate return, the information is not conflicting versus if they are divorced and filed a married return of any kind the information is now conflicting.</p>	Anne Rusk	Resolved.	Refer to <u>comments #3 and #9</u> for resolution.
25.	1. 2014-2015 paper FAFSA question 74 includes the statement, Do not include your parents. Question 96	Lynn Dubay, University of	1. Resolved. No Change.	1. Question #74 is meant for dependent students who are instructed to include parents in the

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	<p>does not include the statement, Do not include your parents.</p> <p>2. Can the information below (or see attached) be included in FOTW as part of the DRT option? (Parents/ students are frustrated when they cannot use the DRT and are not informed why. For example, they owe taxes and haven't paid in full).</p> <p>When Will My Tax Return Information Be Available Using the IRS DRT?</p> <p>The IRS tax return processing times and the availability of the IRS DRT reflected in the chart below are merely guides to help tax filers estimate when they will be able to retrieve their IRS tax return information using the IRS DRT. Specific questions related to the processing of your IRS tax return should be directed to the IRS at 1-800-829-1040.</p> <p>When a tax return filer who... If Tax Return Filed Electronically If Paper Tax Return Filed</p> <p>At the time his or her tax return was submitted to the IRS, has no amount owed or has an expected refund</p> <p>Generally tax returns are accepted by the IRS within a day or two of the return having been electronically filed with the IRS.</p> <p>In most cases, the IRS DRT is available within twothree weeks after the return has been accepted by the IRS.</p> <p>Generally tax returns are accepted by the IRS when the tax return is received by the IRS.</p> <p>In most cases, the IRS DRT is available within eight11 weeks after the tax return has been accepted by the IRS.</p> <p>At the time his or her tax return was submitted to the IRS, has an amount owed and makes a full payment on that amount</p> <p>Generally tax returns are accepted by the</p>	<p>Wisconsin - Stevens Point</p>	<p>2. Resolved.</p> <p>3. Resolved.</p> <p>No Change.</p> <p>4. Resolved.</p> <p>5. Resolved.</p> <p>No Change.</p> <p>6. Resolved.</p> <p>No Change.</p> <p>7. Resolved.</p> <p>No Change.</p> <p>8. Resolved.</p> <p>No Change.</p> <p>9. Resolved.</p> <p>No Change.</p>	<p>household while question #96 is meant for independent students who traditionally do not include parents in their household size.</p> <p>2. The Department of Education created an infographic to promote the IRS Data Retrieval Tool (IRS DRT) and provide general information about how to access it. Please click the following link to access the infographic: https://studentaid.ed.gov/sites/default/files/transf-er-tax-info-to-fafsa.png</p> <p>In <i>FAFSA on the Web</i>SM, the messaging that displays in the IRS DRT section on the “Parent Finances 1,” “Student Finances 1,” “Parent Finances – Correction,” and “Student Finances – Correction” pages when a user is eligible to use the IRS DRT will be updated to read:</p> <p>“Based on your response, we recommend that you transfer your information from the IRS into this FAFSA. <u>How you filed your taxes</u> can affect whether your tax return information is available to transfer.”</p> <p>“How you filed your taxes” will link to the “When will my tax return information be available using the IRS Data Retrieval Tool” help topic.</p> <p>3. The Department of Education provides field level help text in both <i>FAFSA on the Web</i>SM and the IRS Data Retrieval Tool (IRS DRT). This guidance instructs the <i>Free Application for Federal Student Aid</i> (FAFSA[®]) applicant or parent to modify the</p>

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	<p>IRS within a day or two of the return having been electronically filed with the IRS. In most cases, the IRS DRT is available within twothree weeks after the return has been accepted by the IRS. IRS will process the tax return in June. In most cases, the IRS DRT is available within twothree weeks after the tax return has been processed by the IRS.</p> <p>Has an amount owed and subsequent to submitting his or her tax return to the IRS, pays the full amount dueGenerally tax returns are accepted by the IRS within a day or two of the return having been electronically filed with the IRS. In most cases, the IRS DRT is available within threefour weeks after full payment is made. IRS will process the tax return in June. In most cases, the IRS DRT is available within twothree weeks after the tax return has been processed by the IRS.</p> <p>At the time his or her tax return was submitted to the IRS, has an amount owed and has not paid in full Generally tax returns are accepted by the IRS within a day or two of the return having been electronically filed with the IRS. However, IRS will not process the return until May. In most cases, the IRS DRT is available within twothree weeks after the return has been processed in May. IRS will process the tax return in June. In most cases, the IRS DRT is available within twothree weeks after the tax return has been processed by the IRS.</p>			<p>amount that the IRS DRT transferred into the FAFSA, if all or a portion of that amount should not be included as untaxed income because of a rollover.</p> <p>4. <u>Refer to comment #15 for resolution.</u></p> <p>5. Only the individual or a qualified tax preparer can determine which tax form the parent or the applicant is eligible to file. The IRS Data Retrieval Tool cannot determine which tax form an individual is eligible to file.</p> <p>6. The Department of Education believes the information provided in this section of the <i>Student Aid Report (SAR)</i> is adequate. The purpose of the SAR is to provide information about a processed <i>Free Application for Federal Student Aid (FAFSA®)</i>. The SAR includes a link to the National Student Loan Data System (NSLDS®) so applicants can access their financial aid history. To include the totality of this information on the paper SAR is impractical and would add undue burden to the public.</p> <p>7. Use of the IRS Data Retrieval Tool is not the final step to complete the <i>Free Application for Federal Student Aid (FAFSA®)</i>. There are additional questions to be answered before signing and submitting the FAFSA.</p> <p>8. The <i>Free Application for Federal Student Aid (FAFSA®)</i> only requires one set of parent identifiers,</p>

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	<p>3. Include a statement on the FAFSA that if a rollover is included in the DRT instruct the applicant to contact the financial aid office.</p> <p>4. Define the word amend wherever it is used to assist accurate answers.</p> <p>5. Can use of DRT indicate whether or not an individual is eligible to file a 1040A or 1040EZ? If not, can clarifying questions be asked before the question appears whether or not an individual is eligible to file a 1040A or 1040EZ instead of having instructions in the "Help" box?</p> <p>6. Can the following information be provided? Total Aggregate limits for each category of student along (not currently presented) with total amount borrowed to date (currently presented)? Total Pell LEU limit (currently not presented) along with total Pell granted to date (currently presented)? 150% rule regulation</p> <p>7. Can you add Sign and Submit option immediately after using DRT?</p> <p>8. How is it possible to correct FAFSA parent marital status to married/ remarried and the skip logic does not require the other parents name, DOB, SS#?</p> <p>9. Can you provide better instructions for reporting the SCH amount (especially for parent financial information)?</p>			<p>regardless of parent marital status.</p>
26.	On July 30, 2014, Senators Carper and Hirono sent a	Walter	Forwarded to	The Department of Education has referred this

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	<p>letter to Secretary Duncan urging him to restore the questions about service member and veteran status for all applicants in the draft 2015-16 Free Application for Federal Student Aid (FAFSA). Although this change was not made prior to releasing the draft for public comment, we request that the Department do so before finalizing the 2015-16 FAFSA. We remain convinced that such a change is both good and necessary public policy. Because the FAFSA uses a skip-logic function to simplify completion, many service members and veterans never have the opportunity to self-identify. Instead they are automatically skipped past the active duty and veteran status questions based on their answers to earlier questions about their dependency status (including age, degree-level, and marital status). While we recognize and applaud the overall benefits of FAFSA simplification, the questions about military background are easy to answer in a matter of seconds.</p> <p>We believe that the use of a skip logic function on the active duty and veteran status questions works to the detriment of this cohort. First, it limits the ability of states and colleges to target their outreach to service members and veterans as early as possible in the aid application process. Second, it precludes any exploration of their borrowing patterns or indebtedness and subsequently, their repayment status.</p> <p>Why is this important? The Higher Education Opportunity Act of 2008 prohibits schools from considering GI Bill benefits when determining veterans eligibility for federal grants and loans. As a result, some veterans are deemed eligible for federal grants and loans covering up to the full cost of attendance as well as their Post-9/11 GI Bill benefits. A potential unintended consequence is that some veterans may incur</p>	<p>Ochinko, Senate Homeland Security and Governmental Affairs Committee</p>	<p>Appropriate Business Unit.</p>	<p>recommendation to the appropriate business unit for exploration and to respond to Members of Congress.</p>

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	<p>burdensome debt. The Department of Veterans Affairs has paid over \$40 billion in Post-9/11 GI Bill benefits since August 2009, yet Congress lacks data to assess the extent to which veterans are incurring federal student loan debt. With military background information, the Department of Education will be able to fill in data gaps on the federal debt loads and repayment status of individuals using the Post-9/11 benefit.</p> <p>Additionally, we also ask that the Department review questions about active-duty or veteran status to ensure that federal student aid applicants are correctly classified. For example, it may not be clear how individuals in the reserves, who are subject to periodic activations, should answer. Perhaps, rewording the options to read recurring military service and discharged veteran might resolve any confusion. Or, if this is not feasible, the relevant notes and Help and Hints sections could be clarified.</p> <p>Thank you in advance for taking steps to provide the Congress with important data to help ensure that service members and veterans post-service college careers are not compromised by undue financial burdens.</p>			
27.	<p>It is extremely frustrating that colleges are using the order of colleges on the FAFSA to determine interest. There is no reason for the colleges to know this information, and it is being used in a way that I am certain is unintended.</p> <p>Please work to make the order unavailable to receiving institutions. Until this is accomplished, at least make sure that parents and students know this problem is an issue.</p>	Sheri Gross, SMSAPPS.ORG	Resolved.	<p>Step Six on the paper <i>Free Application for Federal Student Aid (FAFSA®)</i> will be updated to read:</p> <p>“Enter the six-digit federal school code and your housing plans. You can find the school codes at www.fafsa.gov or by calling 1-800-433-3243. If you cannot obtain the code, write in the complete name, address, city and state of the college. The information you report on the FAFSA is sent to each college listed, including the names of the other colleges listed. If you do not want this</p>

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				<p>information sent to a particular college, do not list that school. For federal student aid purposes, it does not matter in what order you list your selected schools. For state aid, you may want to list your preferred college first. To find out how to have more colleges receive your FAFSA information, read What is the FAFSA? on page 10.”</p> <p>Text will be added to the “School Selection” page in <i>FAFSA on the Web</i>SM (FOTW), stating:</p> <p>“All of the information you report on the FAFSA will be sent to each college listed, including the names of the other colleges listed. If you don’t want this information sent to a particular college, do not list that school on your FAFSA.”</p> <p>Additionally, text will be added to the “School Selection Summary” page in FOTW, stating:</p> <p>“For federal student aid purposes, it does not matter in what order you list your selected schools. However, placing a school that participates in your state's student grant programs first may help you obtain state grant aid. Check with your state grant agency for more information.”</p>
28.	Recently I learned that The US Department of Education announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process. As a former high school counselor and current college adviser, I would suggest FAFSA consider commercial campaigns and social media campaigns highlighting ways students can begin the process of applying for and renewing aid.	Toye Griffin	Resolved. No Change.	<p>The Department of Education currently engages in public campaigns and high traffic use of digital engagement tools such as Facebook, YouTube, and Twitter to promote financial assistance for students.</p> <p>For more information, go to: http://www.financialaidtoolkit.ed.gov/tk/outreach.jsp</p>

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	<p>Every time I meet with a student they are a bit clueless. I really dont think the high school counselors have enough time review the process and we as advisers often find student not registering in a timely fashion because they assume the financial aid process is quick and it actually is not that quick. Just my two cents.</p>			
29.	<p>I am a member of the National Association of College Admissions Counselors as well as our state affiliate in Illinois. This morning, I learned for the first time that when students list their colleges on their FAFSA, that list is shared among all of the colleges and universities on the student list.</p> <p>I understand the simplicity involved in translating the data from the student-input FAFSA directly to the colleges. Filtering out fields, like the list of colleges, would take programming and time. However, in an age where privacy rights are at the forefront of discussions, I am actually stunned that this information is not just available, but given to all of the colleges that a student is considering.</p> <p>I do know families who pit colleges against each other to maximize aid, and I am sure there are students who want the competing colleges to know whom they are up against. If that is the case, an opt-in box is perfectly acceptable. But for a student who does NOT wish to divulge this information, I think it is really a breach of trust.</p> <p>If there is a petition being circulated, or a survey being taken, please count my voice among the many who are imploring you to take the information-sharing function out of the FAFSA. The conversation should be from the student, to the Department of Education, to individual colleges. We don't need to have a group chat to determine the aid given to any individual student.</p>	Denise Dalton, University of IL at Urbana- Champaign	Resolved.	<u>Refer to comment #27 for resolution.</u>

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30.	I am writing to express my concern about the way colleges are using the order in which colleges are listed on a student's FAFSA application. Their assumption that the order has anything to do with a student's interest in said college is a gross misuse of what should simply be a list of WHERE a student is applying. Colleges should not even be receiving the list--it is none of their business where else a student is applying, and then to have them use it as a means of determining a financial aid package is intolerable. Please stop supplying this list to colleges as FAFSA has not asked for permission to give the list to colleges so does not have said permission.	Corey Fisher, Fredericksburg Academy	Resolved.	<u>Refer to comment #27 for resolution.</u>
31.	I am writing to encourage you to modify the FAFSA so that the government does not provide students college lists to all of the colleges for which the student is applying for aid. First of all, I believe that a students college list is private and should not be shared with anyone. Second of all, colleges often look at the order in which students list colleges on the FAFSA to glean demonstrated interest, assuming that students list their colleges in order of priority which is not necessarily true, and can work to the students disadvantage because they are not told of this practice. So I would prefer it if a students list of schools on the FAFSA form were not shared with anyone. But if they are shared, I would like them to be shared in alphabetical order rather than in the order in which the student has listed them on the FAFSA. This would prevent colleges from trying to infer demonstrated interest from a form in which demonstrated interest is not supposed to be a factor.	Tina Forbush, Park School	Resolved.	<u>Refer to comment #27 for resolution.</u>
32.	I am a College Counselor working in a private high school in India that serves US-passport holders. I would like to add my comments to the discussion around improving	Renee Bowling	Resolved.	<u>Refer to comment #27 for resolution.</u>

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	the FAFSA. Please refrain from sending students' college lists to the colleges as part of the FAFSA transmission, as this is the only way colleges would know of students other applications and can be used in an unethical manner in admissions decision-making.			
33.	Open it up to JUNIORS, January of the year BEFORE they graduate. That way students AND parents will have a better idea how to plan financially when applying to schools in the senior year.	Betty Van Wagenen	Resolved. No Change.	FAFSA4caster SM has been developed to assist the very students and families this comment refers to. FAFSA4caster is a free financial aid calculator that gives users an early estimate of eligibility for federal student aid, providing information that can help families plan ahead for college. The Free Application for Federal Student Aid (FAFSA [®]) must be used to apply for aid once a student decides to apply for financial aid to attend college.
34.	Please consider either of the following modifications to FAFSA: 1. Refrain from sending students' college lists to the colleges; or 2. Inform students that their lists can be sent to colleges (preferably in alphabetical or random order), and allow students to either opt-in or opt-out of such a transmission.	Dele Varga	Resolved.	<u>Refer to comment #27 for resolution.</u>
35.	I am encouraging that the FAFSA be modified in one of the following ways: 1. Refrain from sending students' college lists to the colleges; or 2. Inform students that their lists can be sent to colleges (preferably in alphabetical or random order), and allow students to either opt-in or opt-out of such a transmission.	Mary Ann Poladian	Resolved.	<u>Refer to comment #27 for resolution.</u>
36.	Regarding this practice of sending the Student Aid Reports to all colleges listed on the student's FAFSA, please refrain from sending students' college lists to the colleges. Colleges may be unduly influenced by the	Stuart Siegel	Resolved.	<u>Refer to comment #27 for resolution.</u>

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	<p>ranking of the colleges and they may in fact, be entered randomly or alphabetically or even by preference. However, I am aware that some colleges do look at the listing. By contrast, colleges receiving the CSS/Profile are not informed of the colleges listed.</p>			
37.	<p>Pursuant to the authority granted to the Secretary under 20 U.S. Code Â§ 1087vv, the Association of Community College Trustees (ACCT) strongly recommends enabling FAFSA applicants to use income data from the second preceding tax year on the 2015-2016 FAFSA, also known as prior-prior year (PPY).</p> <p>The ability of applicants to directly import income and financial data into the FAFSA through IRS-DRT has greatly simplified the application process for many students and their families. However, as implemented, data retrieval has significant shortcomings that prevent full usability. For example, it is virtually impossible for an applicant to filing on traditional academic and tax schedules to use the FAFSA-IRS link. A family that files taxes as soon as their W-2s become available at the beginning of February could not use the data retrieval tool until sometime between mid-February and April â well past the application deadlines for many state and institutional aid programs and advised practices for obtaining first-come, first-served grants. PPY could alleviate this issue.</p> <p>FAFSA itself lists 13 states that have aid application deadlines that precede the April 15 tax deadline. Many of the students who are prevented from using IRS-DRT are community college students with simple financial situations but with limited access to immediate income information. The Secretary should implement the use of PPY under his authority under the Higher Education Opportunity Act for the purpose of simplifying the FAFSA</p>	Bryce McKibben, Association of Community College Trustees	Resolved. No Change.	There are current budgetary constraints that prevent the Department of Education from moving to prior-prior for the 2015-2016 award year. However, there is ongoing consideration of prior-prior by the Department.

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	<p>process, and should do so immediately. FAFSA applicants must be given the chance to apply for critical financial aid when they have valid information to determine their eligibility.</p>			
38.	<p>1. Please consider the following suggestions for the 2015-2016 FAFSA: Adding an option to sign and submit a new FAFSA transaction immediately after the DRT is successfully completed and/or add more detailed instructions that the FAFSA needs to be re-signed and submitted after the tool is utilized.</p> <p>2. Providing more detailed instruction/guidance on how to report 529 and other college saving plans.</p> <p>3. Reconsidering the current skip-logic formula to include need-tested benefit questions for low or no income families.</p>	Danielle Smart	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p> <p>3. Resolved. No Change.</p>	<p>1. <u>Refer to comment #25.7 for resolution.</u></p> <p>2. The Department of Education believes the current language provides adequate guidance to answer these questions.</p> <p>3. <u>Refer to comment #21 for resolution.</u></p>
39.	<p>We appreciate that the Department has continued to improve the process of applying for federal aid, including improving and calling more attention to the IRS Data Retrieval Tool, which is the easiest way for applicants to provide accurate tax information. We also thank the Department for incorporating several of our June 2013 suggestions, such as more clearly encouraging students to consult with financial aid offices if they or their family's financial situation changed significantly (in Filling Out the FAFSA).</p> <p>Our comments focus on areas where more clarity and streamlining will make the FAFSA easier to understand and use. Unless otherwise specified, our recommendations about questions, notes, and instructions follow the format of the 2015-16 draft paper FAFSA, and italics indicate suggested modifications. Our</p>	Lauren Asher, TICAS	<p>1. Resolved. No Change.</p> <p>2. Forwarded to Appropriate Business Unit.</p> <p>3. Resolved. No Change.</p> <p>4. Resolved. No Change.</p> <p>5. Resolved.</p>	<p>1. The release and updates that are included in each year's Free Application for Federal Student Aid (FAFSA®), 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 regulatory agencies. Due to the amount of time needed to complete all of these activities, the date on which the application is currently provided via the <i>FAFSA on the Web</i>SM Demo site is the earliest that is possible. For 2015-2016, the Demo site is expected to be available on December 28, 2014.</p> <p>2. The Department of Education has referred this</p>

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	<p>recommendations are also for the FAFSA on the Web (FOTW) and FAFSA on the Phone (FOTP), wherever applicable. As discussed further below, it is essential that simplification efforts extend to all print and online products and interactions, so that all potential aid applicants can benefit.</p> <p>Our comments below are organized into three main sections: the FAFSA public comment process, the FAFSA, and the IRS Data Retrieval Tool. Limited comments on FOTW are included throughout this document.</p> <p>The FAFSA Public Comment Process</p> <p>1. We urge the Department to release draft FOTW materials at the same time as the draft paper FAFSA and to encourage public review so that students, financial aid administrators, and other stakeholders can provide the Department with important, timely, and coordinated feedback on these interrelated forms and processes. We understand that updating the FOTW is a substantial undertaking. However, given that almost all (99%) FAFSAs are now expected to be filed online, we continue to urge the Department to make a preview version of the FOTW available during the public comment period, to provide stakeholders the opportunity to weigh in on proposed changes and suggest improvements. Some information about FOTW is available in the “Data Elements and Justification” chart, 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>6. Resolved. No Change.</p> <p>7. Resolved. No Change.</p> <p>8. Resolved. No Change.</p> <p>9. Resolved. No Change.</p> <p>10. Resolved. No Change.</p>	<p>recommendation to the appropriate business unit for review.</p> <p>3. <u>Refer to comment #26 for resolution.</u></p> <p>4. The Department of Education collaborated with a number of other agencies to draft the three homelessness questions when they were added to the Free Application for Federal Student Aid (FAFSA[®]). Because the criteria is different for each, it was determined that creating three separate questions would provide for the least amount of confusion on the applicant’s part, allow for better follow-up on the part of the financial aid administrator, and allow the Department of Education to better understand the population of applicants who answer “Yes” to any of the three questions.</p> <p>5. <u>Refer to comment #3 for resolution.</u></p> <p>6. The Free Application for Federal Student Aid (FAFSA[®]) definition for youth is set at age 21 to be consistent with the Runaway and Homeless Youth Act. Applicants aged 22 and 23 are considered to be independent if a financial aid administrator makes a determination that the student is homeless or at risk of being homeless.</p> <p>7. The Department of Education believes the current output documents provide adequate guidance.</p> <p>8. When an applicant or parent uses the IRS Data</p>

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	<p>The FAFSA Order of elements in Paper FAFSA</p> <p>2. 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> <p>Step Three (Student)</p> <p>3. Questions 49 and 50: Active Duty Service Members and Veterans of the U.S. Armed Forces Because the FOTW uses a “skip-logic” function to simplify completion, many service members and veterans never have the opportunity to identify their status when they apply for federal student aid. Instead, those who are identified as independent students based on their answers to earlier questions about their dependency status (including age, degree-level, and marital status) never see the active duty and veteran status questions.</p> <p>While we recognize and applaud the overall benefits of FAFSA simplification, the questions about military background are both important and easy to answer in a</p>			<p>Retrieval Tool (IRS DRT) to retrieve tax information from the IRS, the data that is transferred to and displayed on the <i>Free Application for Federal Student Aid</i> (FAFSA®) differs, depending on which tax return the applicant, or parent, filed.</p> <p>When a 1040EZ is filed, the following fields are populated in <i>FAFSA on the Web</i>SM (FOTW):</p> <ul style="list-style-type: none"> • Tax return filing status • Type of tax return filed • Adjusted gross income • Taxes paid • Exemptions • Income Earned from Work <p>When a 1040 or a 1040A is filed, the following fields are populated in FOTW:</p> <ul style="list-style-type: none"> • Tax return filing status • Type of tax return filed • Adjusted gross income • Taxes paid • Exemptions • Income earned from work • Education credits • IRA deductions • Tax-exempt interest income • Untaxed IRA distributions • Untaxed pension <p>Since the data that can be transferred from the IRS DRT is dependent on the type of tax return filed, the Department of Education believes that the</p>

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	<p>matter of seconds. We recommend that these questions be restored for all FOTW users, as requested by U.S. Senators Carper and Hirono in a letter to Secretary Duncan on July 30, 2014 and referenced in the comments submitted by Walter Ochinko on October 2, 2014. This change would increase the ability of states and colleges to conduct targeted outreach to veterans and service members who may be eligible for additional aid and/or services, and would also improve the available data on federal student aid usage by veterans and service members.</p> <p>4. Questions 56-58: Unaccompanied homeless youth 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. We are pleased to see that applicants who are “self-supporting and at risk of being homeless” have now been added to these questions, addressing the statutory issue. But we must continue to recommend that instead of asking three separate questions in the paper FAFSA to try to capture the various ways an applicant might qualify as an independent student due to being homeless or at risk of homelessness, the paper form should ask just one simple question – as the FOTW already does – accompanied by a more detailed Notes section. Specifically, 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</p>			<p>guidance currently provided is adequate.</p> <p>9. Data from W-2 and 1099 forms are not available because these forms are provided by external sources. Therefore, the IRS Data Retrieval Tool will not be able to provide this information. The Department of Education has provided guidance and continues 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>10. FAFSA4casterSM does not collect personally identifiable information. In order to use the IRS Data Retrieval Tool (IRS DRT) 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.</p>

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	<p>FOTW: 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.) The new question would be accompanied by a reference to the Notes section, and the first paragraph of the Notes for this question would read: Answer “Yes” if you received a determination at any time on or after July 1, 2014, that you were an unaccompanied youth who was homeless, or self-supporting and at risk of being homeless, from any of the following sources: - Your high school or school district homeless liaison - The director, or designated staff, of an emergency shelter program funded by the U.S. Department of Housing and Urban Development - The director, or designated staff, of a runaway or homeless youth center or transitional living program. - A financial aid administrator at the school you attend or plan to attend.</p> <p>5. Step Four (Parent) Questions 59, 61-64, 65-68 We understand that the Department is developing additional resources to assist students whose parents are “unmarried and both parents living together” in answering questions 80-94, as we recommended in our June 2013 comments. 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-10pm ET) or with frequently asked questions would benefit from user-friendly online</p>			

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	<p>information, which could also reduce the need for phone assistance. We look forward to seeing the completed resources and hope that they are easy for applicants to find and understand.</p> <p>Notes Notes for questions 56-58</p> <p>6. Since 2008, we have urged the Department to revise the Notes for questions 56-58 as follows to simplify the application process for homeless youth and maintain consistency with legislative intent:</p> <ul style="list-style-type: none"> • “Youth” means you are 21 23 years of age or younger... <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 for which they</p>			

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	<p>are eligible.</p> <p>In its response to our most recent comments on this issue, the Department said, “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 2014-15 FAFSA.” Now that a year has passed, we hope that the Department is prepared to address this issue and move forward with defining homeless youth aged 22 and 23 as independent in the 2015-16 FAFSA and FOTW.</p> <p>What is the FAFSA?</p> <p>7. We also 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: 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.</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 paper 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 for which they qualify. The Department has already recognized the</p>			

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	<p>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>The IRS Data Retrieval Tool</p> <p>8. We applaud the Department for continuing to improve the IRS Data Retrieval Tool (DRT), and for highlighting the tool in draft materials for the 2015-16 cycle. However, these materials could further emphasize the tool’s benefits and ease of use. We strongly encourage the Department to mark the questions on the paper FAFSA that could be pre-populated using the DRT, which could encourage applicants to shift from paper to the FOTW to benefit from the DRT. If the Department is developing an FOTW Worksheet for 2015-16, it should also note which questions could be answered with the DRT.</p> <p>9. We continue to strongly urge the Department to work with the IRS to extend the substantial benefits of the DRT process to more applicants and potential applicants, as discussed in our comments from previous years. In its current form, the DRT draws data only 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 report, <i>After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid</i>. The</p>			

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	<p>Department has stated that it will have conversations to explore this issue, and we look forward to learning about the status of those discussions.</p> <p>10. We continue to encourage the Department to consider how the DRT could be integrated into the FAFSA4caster so that the user has the option of a more precise aid estimate, in addition to the current format. 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 them aware of the DRT well before they face the FAFSA itself.</p>			
40.	<p>In California we have over 40,000 undocumented students who will be applying for state Dream Act financial aid in 2015-16. The Departments advice for these students to file a FAFSA will upset our current processes and disadvantage California Dream Act students. Please see our comments regarding the Draft 2015-16 FAFSA below.</p> <p>1. Notes (page 2): In the notes for Questions 14 and 15 on page 2 it says 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.</p> <p>This advice is not helpful for these non-federal aid eligible students because their ISIRs will not have a calculated EFC. We have our own state application for these students, and it does calculate an EFC.</p> <p>Proposed Amended Language: If you have a Social Security Number but are not a citizen or an eligible noncitizen, you should still complete the FAFSA because</p>	Bryan Dickason	<p>1. Resolved.</p> <p>2. Resolved.</p> <p>3. Resolved.</p> <p>No Change.</p> <p>4. Resolved</p>	<p>1. The text for the California state deadline will be expanded in <i>FAFSA on the Web</i>SM to include this paragraph:</p> <p>“If you are a non-citizen holding a Social Security card issued through Deferred Action for Childhood Arrivals (DACA) or for some other work authorization, you should fill out the California Dream Act Application found at www.caldreamact.org. Do NOT fill out a FAFSA. Contact the California Student Aid Commission (www.csac.ca.gov) or your financial aid administrator for more information.</p> <p>2. The second paragraph in the Notes on page 2 has been updated to read:</p> <p>“If you are in the U.S. and have been granted Deferred Action for Childhood Arrivals (DACA), an F1 or F2 student visa, a J1 or J2 exchange visitor</p>

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	<p>you may be eligible for state or college aid. States like California have a dedicated Dream Act Application for those without the immigration statuses listed in the paragraphs above. Check with those states before filing the FAFSA.</p> <p>2. Question 14: Despite the existing notes defining an eligible noncitizen, we are already seeing students without legal immigration status mistakenly selecting option 2, eligible noncitizen, on the FAFSA. Students in states like CA and others that have passed Dream Act-type state financial aid laws see the term eligible noncitizen and think, I am eligible for Dream Act financial aid and I am a noncitizen, so this is the correct response for me. This causes flags, processing errors, and delays in awarding and disbursements at the California Student Aid Commission and at California institutions. Proposed Amended Language: 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. States like California have a dedicated Dream Act Application for those without the immigration statuses listed in the paragraphs above. Check with those states before filing the FAFSA.</p> <p>3. Questions 18,19,20 and 70,71,72: Our experience has shown that California Dream Act students (without legal immigration status) are very afraid to answer these questions. (Our 2012-13 application had this identical language and caused such concern that we have since changed it in the 2013-14 and 2014-15 applications.)</p>			<p>visa, or a G series visa (pertaining to international organizations), select “No, I am not a citizen or eligible noncitizen.” You will not be eligible for federal student aid. If you have a Social Security Number but are not a citizen or an eligible noncitizen, including if you have been granted DACA, you should still complete the FAFSA because you may be eligible for state or college aid.”</p> <p>3. The wording of these questions has been carefully selected in consultation with the states since use of the responses vary by state. Section 483(a)(1) of the Higher Education Act, 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>4. Notes for questions 21 and 22 on Page 2 have been updated to read:</p> <p>“To be eligible for federal student aid, male citizens and male immigrants residing in the U.S. aged 18 through 25 are required to register with the Selective Service System, with limited exceptions. This requirement applies to any person assigned the sex of male at birth. The Selective Service System and the registration requirement for males preserves America’s ability to provide resources in an emergency to the U.S. Armed Forces (Army, Navy, Air Force, Marines or Coast Guard). For more information about the Selective Service System, visit www.sss.gov. Forms are available at your local U.S. Post Office.</p>

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	<p>These folks dont have legal status, so they think they will get in trouble with authorities if they identify a state of legal residence.</p> <p>4. Question 22: Undocumented males cannot be registered online through the process used for other FAFSA filers. They must register through a paper process. Undocumented males filing the FAFSA would check this box and think they had done everything necessary to register when in fact, they had done nothing. This will hold up their aid and cause confusion.</p>			
41.	<p>1. Make it impossible for any of the colleges who receive a students FAFSA to see the other colleges also being sent that students FAFSA: In talking informally with a number of college admissions representatives from a variety of colleges and universities, many, including the most selective in terms of acceptance rates, admit that FAFSA position helps them gauge a students interest in their school. As demonstrated interest is a strong factor in the admissions process at these schools, providing this information to the colleges and universities puts a student at a disadvantage in the admissions process. Students do not apply to colleges randomly and a solid list includes schools that the student in genuinely interested in. Just because a school on the list of 10 on the FAFSA allows is at the bottom of the list does not mean that they are any less interested in attending that school than the one at the top.</p> <p>2. The IRS Data Retrieval Tool is great but should be able to be used for the past years taxes as well as the current years taxes. This will not eliminate a student from having to update their information after their current</p>	Daniel Kramer	<p>1. Resolved.</p> <p>2. Forwarded to Appropriate Business Unit.</p>	<p>1. <u>Refer to comment #27 for resolution.</u></p> <p>2. The Department of Education has referred this recommendation to the appropriate business unit for review.</p>

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	<p>year taxes are completed but it will help speed up the initial completion process.</p>			
42.	<p>As a college counselor who has worked in the field for 20 years, I strongly urge you to stop sending colleges the complete list of colleges to which a student is submitting the FAFSA.</p> <p>It is an unfair practice through which students both lose control of what should be confidential information, and also are often punished by colleges who perceive themselves not to be the student's first choice.</p> <p>The potential damage only impacts students who need financial aid, making it discriminatory. Students wealthy enough to pay the full bill for college gain an advantage by being able to keep their preferences private.</p> <p>Please take steps to change this procedure and protect the privacy and rights of all students.</p>	<p>Moira McKinnon, Berwick Academy</p>	<p>Resolved.</p>	<p><u>Refer to comment #27 for resolution.</u></p>
43.	<p>I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	<p>Marilyn Stelzner</p>	<p>Resolved. No Change.</p>	<p>The Department of Education provides adequate guidance in the <i>FAFSA on the Web</i>SM help text, which instructs applicants to select "Foreign Country" if their legal residence is in a foreign country.</p>

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44.	<p>I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Caroline Bouffard	Resolved.	<u>Refer to comment #43 for resolution.</u>
45.	<p>I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Tina DeJong	Resolved.	<u>Refer to comment #43 for resolution.</u>

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46.	With regards to docket #: ED-2014-ICCD-0125 I would like to request that the FAFSA stop requiring US citizens who legally reside outside of the US or Canada to select a state of legal residence.	Kara Madden	Resolved.	<u>Refer to comment #43 for resolution.</u>
47.	I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change. At the current time, students are asked: What is your state of legal residence? There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States. Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.	Laura O'Brien Gatzionis	Resolved.	<u>Refer to comment #43 for resolution.</u>
48.	This is a request that, as you are revising the FAFSA, you stop requiring a state of legal residence for U.S. citizens who legally reside outside the United States or Canada when they fill out the FAFSA. This always causes so many questions and confusion amongst our families, since they have no legal residence in the U.S.	Chuck Krugler	Resolved.	<u>Refer to comment #43 for resolution.</u>
49.	I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change. At the current time, students are asked:	Sarah Contomichalos	Resolved.	<u>Refer to comment #43 for resolution.</u>

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	<p>What is your state of legal residence? There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States. Please make this field optional or require students to specify their country of legal residence if they do</p>			
50.	<p>I write to request that the FAFSA please include US citizens living outside the US to be included as the area of residence, when answering this question on the FAFSA. It is now a global world that requires Americans to live abroad.</p>	Nicole Cote-Crosskill	Resolved.	<u>Refer to comment #43 for resolution.</u>
51.	<p>I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change. At the current time, students are asked: What is your state of legal residence? There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States. Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Barbara Chen	Resolved.	<u>Refer to comment #43 for resolution.</u>
52.	<p>I understand that the US Department of Education</p>	Deb Landon	Resolved.	<u>Refer to comment #43 for resolution.</u>

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	<p>recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>			
53.	<p>I understand that the U.S. Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Ginny Wirzbicki	Resolved.	<u>Refer to comment #43 for resolution.</u>
54.	I understand that the US Department of Education	Whitney	Resolved.	<u>Refer to comment #43 for resolution.</u>

#	Comment	Commenter	Status	Resolution
	<p>recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Laughlin		
55.	<p>I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Ellen Gaddie	Resolved.	<u>Refer to comment #43 for resolution.</u>
56.	I understand that the US Department of Education	Linda	Resolved.	<u>Refer to comment #43 for resolution</u>

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	<p>recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Magnussen		
57.	<p>I am writing to you regarding the improving the Free Application for Federal Student Aid (FAFSA) process. I have been working in higher education and enrollment for 17 years and I can tell you than none of the universities I have been employed at utilized FAFSA data for malicious purposes.</p> <p>In fact, most schools use this information as a supplemental planning tool in order to predict yield and enrollments, which in this era of declining state appropriations, allows us to more accurately predict net revenue for budget planning purposes. I also believe this data is important to colleges and universities for the following reasons:</p> <ul style="list-style-type: none"> -This information is some of the most reliable in terms of predicting the overall size of the class and the amount of net revenue it will produce -If you are a college with a fixed enrollment, you need to predict class size so you know how many students to 	Chris LaRusso, Assistant Vice President- Enrollment Services, Edinboro University	Resolved.	<u>Refer to comment #27 for resolution.</u>

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	<p>admit. This will lead to weaker models, which will lead to lead to less confidence and placing more students on the waitlist to ensure that we do not over-enroll</p> <p>-If you are a college trying to grow enrollment, this information helps us understand how the class is building and whether we need to redouble efforts, such as conducting a late senior search, sending out more communication, or being more aggressive with scholarship negotiation</p> <p>-In either case, have strong predictability allows us to build realistic and informed budgets as schools move into the next fiscal year</p> <p>-It allows colleges to target and streamline their communication efforts, saving money and trees as we reduce the amount of communication that goes out to students that are less interested in our college</p> <p>I believe a vocal minority of NACAC members are making this out to be a much bigger issue than it is. NACAC already provides guidelines in the SPGP to its membership about how this information should be used. If this proposal is approved, I believe it is only going to hurt students. If certain universities are using this data for making admission or aid decisions, NACAC should be working on trying to identify these institutions and stop them from continuing this practice as opposed to their entire membership, and ultimately, the students.</p>			
58.	I would like to request that the FAFSA please stop requiring US citizens that reside abroad to select a state of legal residence.	Nora Kling	Resolved.	<u>Refer to comment #43 for resolution.</u>
59.	It would be help aid administrators, and our neediest students, if we could remove the skip logic that does not allow students/parents with low incomes to include untaxed income, etc when completing the FAFSA. Aid	Teresa Hewitt	Resolved. No Change.	<u>Refer to comment #21.2 for resolution.</u>

#	Comment	Commenter	Status	Resolution
	administrators would be able to process these students' aid more quickly if the students/parents were allowed to answer these question/s on the FAFSA. Because administrators cannot get this information through the FAFSA we have to spend time following up with the students.			
60.	<p>I understand that the US Department of Education recently announced that it is accepting comments from the public about how to improve the Free Application for Federal Student Aid (FAFSA) process, and I request that you adopt the following change.</p> <p>At the current time, students are asked: What is your state of legal residence?</p> <p>There is no option available to select "None" or to specify a foreign country other than the available options for selecting a Canadian province. However, there are many US citizens living in foreign countries, eligible for federal financial aid, who do not have a state of legal residence. Some of them may never have resided in the United States.</p> <p>Please make this field optional or require students to specify their country of legal residence if they do not have a state of legal residence.</p>	Jennie Kent	Resolved.	<u>Refer to comment #43 for resolution.</u>
61.	Please stop requiring US citizens who legally reside outside of the US or Canada to select a state of legal residence. They may not have a state to list and it causes a lot of confusion.	Martha Moses	Resolved.	<u>Refer to comment #43 for resolution.</u>
62.	1. It would be beneficial to add an estimated federal income tax calculator for families to use when completing the income tax question. For early FAFSA filers who have not yet completed their tax forms, this would be helpful in arriving at a figure closer to the actual tax liability rather than the taxes withheld that many families use. This would initially provide a more	Christine Zuzack	<p>1. Resolved. No Change.</p> <p>2. Forwarded to Appropriate Business Unit.</p>	1. All of the data needed to calculate the estimated taxes paid is not collected on the <i>Free Application for Federal Student Aid (FAFSA®)</i> . The guidance provided in the <i>FAFSA on the WebSM</i> help text advises students and parents to estimate the amount that will be paid when the tax form status is "will file". Taxes can be estimated by looking at

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	<p>accurate EFC for financial planning purposes until the Tax Transcript information can be updated on the FAFSA.</p> <p>2. Please continue to ask the Veteran question on the FOTW, even if the student is independent for other reasons, since this is a good way to identify veterans who may be eligible for additional assistance or programs.</p>			<p>the prior year tax form, looking at the IRS tax tables, or using the tax calculator that is available on the IRS Web site.</p> <p>2. <u>Refer to comment #26 for resolution.</u></p>
63.	<p>1. Refer to student and parent in third-person. It is still unclear for many families who you is on the FAFSA. Any instance of you should be replaced with student. Many times, parents are inputting their name and financial information as you, to only discover they made a mistake. Upon attempting to correct the information, they will oftentimes only correct the demographic information, making the students EFC inflated for having incorrect student financial information.</p> <p>2. Parent information should read Parent/Stepparent 1. The advent of Parent 1 and Parent 2 has brought additional confusion to the FAFSA application it is very confusing for families of divorce, separation, remarriage, etc. The first appearance is on the highest school completed. Some families are answering these questions based on the biological parents, even if parents are divorced and remarried. They seem to think its the biological parents that are needed, no matter the circumstances.</p> <p>3. Question #26 should have an option for Foreign High School Credential. Most ability-to-benefit confirmation has resulted in students proving they did indeed receive a high school equivalent, but have no option to state</p>	Justin Brown	<p>1. Resolved. No Change.</p> <p>2. Resolved.</p> <p>3. Resolved.</p> <p>4. Resolved. No Change.</p> <p>5. Resolved. No Change.</p> <p>6. Resolved.</p>	<p>1. The Department of Education considers this suggestion a stylistic preference.</p> <p>2. <u>Refer to comment #3 for resolution.</u></p> <p>3. <u>Refer to comment #1 for resolution.</u></p> <p>4. The current design of the <i>Student Aid Report</i> (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. In addition, students and parents receive emails when the <i>Free Application for Federal Student Aid</i> (FAFSA®) is processed. If the application was not processed successfully, the subject of the student’s email indicates that action is required and the text states “there are issues with your FAFSA that you need to resolve before your eligibility for financial aid can be determined.” Parents are told that the students have been notified of the status of their application.</p> <p>5. The Department of Education limits the collection of information to data necessary to</p>

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	<p>that currently. Allow the option for a student to self-report a foreign high school credential to demonstrate their ability to benefit.</p> <p>4. The Student Aid Report (SAR) needs a complete overhaul. It is not formatted in a way that is easy to read. The most important information needs to be highlighted or emphasized in some way. It needs to be formatted in such a way that it is eye-catching and information needs to be more concise. One example is when a FAFSA is rejected, the student receives the SAR and there is a very benign message regarding the reject. Students and families dont realize they actually need to make a correction. In our case, we have to tell them, but this usually doesnt happen until after we begin loading the FAFSAs (ISIRs) into our system (after the priority date). This negatively affects many families who claim they didnt know there was a reject. The layout and readability of the SAR could be greatly improved. Other than it being provided as a PDF, it is essentially 1970s technology.</p> <p>5. Add a Social Security Income (SSI) field to the FAFSA so that families dont need to unnecessarily get selected for verification to prove how they support themselves (under V6 criteria); this field, of course, would not calculate into the federal EFC methodology (its just for informational purposes to you dont have to select someone for verification it wouldnt be calculated in). It could also prevent people from mistakenly entering this amount into the other income fields (or other income) that could negatively affect them when it is not supposed to, which is caught if they are verified.</p>			<p>determine eligibility in order to simplify the application process. The verification selection process is separate from the application process and takes place after the <i>Free Application for Federal Student Aid (FAFSA®)</i> has been submitted.</p> <p>6. <u>Refer to comment #27 for resolution.</u></p>

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	<p>Allowing this to be entered would prevent a lot of students from needing to be selected for verification or from having to prove they are poor.</p> <p>6. Inform students that their lists of college preferences can be sent to colleges (preferably in alphabetical or random order). In some cases, schools need to know which other schools are listed, but schools would never need to know the order in which the student listed them, which is presumably the order of preference that student has for those schools.</p>			
64.	<p>Please consider allowing for more than 10 colleges to be listed at a time on the FAFSA. While I would not advise students to apply to more than 10 colleges, the reality is that MANY students do with college lists growing to be 15+ schools long. We also need to be mindful that students must add "financial safety schools" to their list which sometimes makes the lists grow longer, but at the end of the year, provides hopefully a safety net for students to fall back into in case their top choice schools did not offer them enough aid.</p> <p>When a student has more than 10 colleges, the SAR review and FAFSA update process becomes so troubling for our students and families. Especially when using estimated taxes initially. This can equal at least 4 FAFSA submissions - and that is not even counting the chance that additional updates will need to be made in the case of mistakes and mismatched information. We lose students through this process and it is a shame. If the FAFSA allowed for 15 colleges to be listed at a time this would alleviate many headaches for college access professionals and would be a very student-centered approach for the DOE to make. With the amount of</p>	Holly Morrow	Forwarded to Appropriate Business Unit	The Department of Education has referred this recommendation to the appropriate business unit for review.

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	follow-up steps necessary for verification, if we could make this one simplification it would go a very long way.			
65.	<p>Marital status:</p> <p>1. We have had many students get confused with the Separated marital status option. We have had students select this option confusing it to mean separated by distance (i.e. a students parents are married, but the student separated because their mom is lives here with them, but their dad lives in Mexico). Suggestion would be to include the following separated by distance is not considered legally separated.</p> <p>2. Q16 needs to be reworded like Q59 and the responses should be similar too. We have many students who are separated and answer single instead of separated on their FAFSA. Q16 should ask, "As of today, what is your marital status?" and the response should be: Single (Never married) Separated Married/remarried Divorced/widowed</p>	Anonymous	<p>1. Resolved.</p> <p>2. Forwarded to Appropriate Business Unit.</p>	<p>1. The Department of Education will add the following text to <i>FAFSA on the Web</i>SM to define the marital status of "Separated" :</p> <p>For FAFSA purposes, a married couple is separated if the couple is considered legally separated by a state, or if the couple is legally married but has chosen to live separate lives, including living in separate households, as though they were not married. If you and your spouse are separated but living together, select "I am married / remarried," not "I am separated."</p> <p>NOTE: When two married persons live as a married couple but are separated by physical distance (or have separate households), they are considered married for FAFSA purposes.</p> <p>2. The Department of Education has referred this recommendation to the appropriate business unit for review.</p>
66.	Information needs to be provided to applicants as to the preference of using the IRS Tax Retrieval Tool. Applicants who have never completed the FAFSA before tend to enter the income information manually. They are not warned they will need to get a Federal Income Tax Transcript if they manually enter the information.	Lanetta Phillips	Resolved. No Change.	The Department of Education believes that it provides adequate guidance.
67.	1. FAFSA Question 44d: Taxable student grant and scholarship aid reported to the IRS in your adjusted gross income. Includes AmeriCorps benefits (awards, living allowances and interest accrual payments), as well as	Anonymous	1. Forwarded to Appropriate Business Unit.	1. The Department of Education has referred this recommendation to the appropriate business unit for review.

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	<p>grant and scholarship portions of fellowships and assistantships.</p> <p>In FAFSA on the Web (FOTW), I suggest adjusting the skip logic here so that a student who reports that they will not file a tax return is prevented from entering an amount of taxable grants/scholarships reported to the IRS in their AGI. I also suggest that the instructions be more specific about where the applicant (or parent, in FAFSA question 93d) would find this information on their tax return if the question does, in fact, apply to them. Suggested text: Taxable grants/scholarships may be reported with wages, salaries, and tips on IRS Form 1040/1040A - line 7 or IRS Form 1040EZ - line 1 if the SCH designation is present.</p> <p>2. FAFSA Question 28. Will you have your first bachelors degree before July 1, 2015? and FAFSA Question 30. When you begin the 2015-2016 school year, what degree or certificate will you be working on?</p> <p>In FOTW I suggest that applicants are somehow notified of discrepant information if they answer "Yes, I will have my first bachelor's degree by 7/1/15" to Question 28 and "1st bachelor's degree" to Question 30. If a student who is otherwise eligible for a Pell Grant responds to Question 28 incorrectly, their award could also be prepared incorrectly and/or they may require more attention from aid administrators throughout the awarding process.</p>		<p>2. Resolved. No Change.</p>	<p>2. In <i>FAFSA on the Web</i>SM (FOTW), question #28 displays after question #30 so Web logic can be used to assist with answering question #28. The answer to question #28 pre-fills with "No" when the response to question #30 is "1st bachelor's degree."</p> <p>Additionally, in 2014-2015, the Department of Education added the following guidance to FOTW help text:</p> <p>"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>
68.	<p>1. In general, we think web logic could be used to ask a series of questions to the student to determine which parent(s) should be reported on the FAFSA.</p>	Worth Ferguson	<p>1. Resolved. No Change.</p> <p>2. Resolved.</p>	<p>1. <u>Refer to comment #3 for resolution.</u></p> <p>2. <u>Refer to comment #20.9 for resolution</u></p>

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	<p>2. We believe the term legal parents is confusing and biological and/or adoptive parent should be used as much as possible instead.</p> <p>3. Logic should be built in to the form so that if a student or parent changes their marital status from a previous year or transaction it will require them to update the marital status date. We have had to ask for clarification often because a marital status date was not accurate and it appeared to conflict with the tax filing status.</p> <p>4. If a student reports their parents are married, the FAFSA should require that a name, SSN (or zeros), and DOB be entered for BOTH parents in order to submit or process. Currently, the parent marital status can be married and only one parent can be listed. This makes it unclear if the other parent had income that has been left off.</p> <p>5. IRS data retrieval should pull the tax filing status. We are unclear if this is the case or not, but believe that it is currently manually entered by the applicant.</p> <p>6. IRS data retrieval should be upgraded to be able to pull in data for both parents if they filed separate returns and combine amounts where applicable.</p> <p>7. IRS data retrieval should be upgraded to pull income earned from work using W2s on file with the IRS. It can still be manually corrected by the applicant as needed.</p> <p>8. If the foreign return indicator is selected, do not allow</p>		<p>3. Forwarded to Appropriate Business Unit.</p> <p>4. Resolved. No Change.</p> <p>5. Resolved. No Change.</p> <p>6. Forwarded to Appropriate Business Unit.</p> <p>7. Resolved.</p> <p>8. Resolved. No Change.</p> <p>9. Resolved.</p> <p>10. Resolved. No Change.</p> <p>11. Forwarded to Appropriate Business Unit.</p> <p>12. Resolved. No Change.</p>	<p>3. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>4. The demographic information of just one parent is required to submit The <i>Free Application for Federal Student Aid</i> (FAFSA®). If the parents' marital status is married, the applicant or parent should select "Married" as the parents' marital status and report income information for both parents.</p> <p>5. Currently, the applicant manually enters the tax filing status prior to utilizing the IRS Data Retrieval Tool (IRS DRT). Only if that status matches the tax filing status on the tax form filed with the IRS can the applicant transfer their data from the IRS into the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>6. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>7. <u>Refer to comment #39.9 for resolution.</u></p> <p>8. The tax filing status question (question #34 for students and question #82 for parents) displays before the tax return type question (question #33 for students and question #81 for parents) due to IRS Data Retrieval Tool logic. Therefore, the Department of Education can not make the change requested.</p>

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	<p>the applicant to select a tax filing status. Head of Household was frequently selected by these individuals, causing a comment code for a review, but tax filing statuses vary from country to country.</p> <p>9. We had a large number of applicants who had the amended return flag on their ISIR but asserted they did not file an amended return and did not select that they did on the FAFSA. This may need to be researched and tested to make sure it is not being set in error or to make it clearer to applicants when to select it.</p> <p>10. The comment codes generated for apparent discrepancies in tax filing status and marital status should not be added for a parent/student who reports a marital status of widowed with a status date within the past 3 years and a tax filing status of qualifying widower as this is an acceptable status for the 3 tax years after the death of the spouse.</p> <p>11. Marital Status Questions Student marital status options currently are</p> <ul style="list-style-type: none"> - I am single - I am married/remarried - I am separated - I am divorced or widowed <p>We recommend that student marital status options be listed as:</p> <ul style="list-style-type: none"> - I am single and never married - I am married - I am remarried 		<p>13. Resolved. No Change.</p>	<p>9. <u>Refer to comment #15 for resolution.</u></p> <p>10. As per Internal Revenue Service (IRS) guidelines, the income for a deceased spouse may be reported on a tax return with a filing status of Qualifying widow(er). Therefore, the following comment text displays on the <i>Student Aid Report</i> when parent marital status is reported as Widowed and parent tax filing status is reported as Qualifying widow(er):</p> <p>“You reported that your parents’ marital status is widowed. Review Items 85 through 89, 93, and 94 to make sure the income information reported does not include your parent’s spouse’s <Year> income.”</p> <p>11. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>12. The Department of Education coordinates state deadlines with state representatives.</p> <p>13. The Department of Education believes the Help Text provided for these questions on <i>FAFSA on the Web</i>SM is adequate.</p>

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	<ul style="list-style-type: none"> - I am separated - I am divorced - I am widowed <p>Parent marital status options currently are</p> <ul style="list-style-type: none"> - Never married - Unmarried and both parents living together - Married or remarried - Divorced or separated - Widowed <p>We recommend the options align with the options for the student as much as possible. We recommend:</p> <ul style="list-style-type: none"> - I am single and never married - I am married - I am remarried - I am separated - I am divorced - I am widowed - I am living with the students other biological or adoptive parent, but we are not married <p>12. The deadline for Texas is March 15th.</p> <p>13. Add additional information relating to questions #34 and #82 please include a statement noting that if remarried at time of FASFA filing they must include both incomes, even if they filed separate returns.</p>			
69.	<p>FOTW issues:</p> <p>1. Parents often skip answering the income questions related to "Untaxed Income" and "Additional Financial Information". The instructions ask parents to select</p>	Anonymous	1. Forwarded to Appropriate Business Unit.	<p>1. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>2. The Department of Education uses skip logic in</p>

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	<p>which income sources they have which, when selected, allows them to input an amount. When parents skip these questions, we find discrepancies when verifying the FAFSA data because tax information shows they actually do have sources of untaxed income and additional financial information that should have been reported. Consider creating a response to this question such as "My parents do not have any Untaxed Income" and "My parents do not have any Additional Financial Information" which could be tied to a soft edit if these questions are skipped altogether. The active confirmation of saying "no, I don't have this type of income" would at least indicate they read the question and responded rather than skipped the questions.</p> <p>2. Students often misreport their parents' income as their own income. On FOTW, there are several pages of student data, and then the parent income data comes next, followed by student income data. Switching back and forth between student and parent data may be confusing. If students report their income first, they may not be as likely to report the same income as their parents. Perhaps keeping all the student demographic and income data together BEFORE switching to parent data would help with this common error. If it is not possible to change the order of the screens, can the edit re: duplicate income reporting include the name of the applicant or parent (since that data has been collected on a prior screen)? Example: "Sally's income (the student) is the same as Henry's income (the parent). Is this correct?" In addition, when the edit about duplicate income reporting is present it is too easy to skip this edit and continue the application without changing the data.</p>		<p>2. Resolved. No Change.</p>	<p>combination with other functionality in <i>FAFSA on the Web</i>SM (FOTW) to present applicants with the appropriate questions needed to complete the form. Many students who qualify for an Automatic Zero Expected Family Contribution (EFC) are not required to respond to a large percentage of the <i>Free Application for Federal Student Aid</i> (FAFSA[®]) questions. A dependent student's eligibility for an Automatic Zero EFC is based on the financial information of the parent(s). Therefore, the parent questions display immediately following the "Dependency" page when a student is determined to be dependent.</p> <p>In the case of double reporting of income, the edits that display in FOTW require the applicant to review and verify that the responses provided are correct. If the responses provided are incorrect the applicant is instructed to change the incorrect response(s), and if the responses are correct the applicant is instructed to proceed. FOTW must allow the applicant the opportunity to proceed without changing any data if, in fact, the data provided is correct.</p>

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	Consider adding a required response when duplicate income is reported, such as "Is this correct?" and if this question is not answered, the edit cannot be bypassed.			
70.	<p>TG offers the following comments which focus on making the form easier for students and families to understand:</p> <p>1. General comment: The Department should consider using font size 11 to support its current initiative to improve the readability of federal forms for visually-impaired borrowers.</p> <p>2. Page 1, Section entitled "Filling Out the FAFSA": references the website www.studentaid.gov/completefafsa. Several FAFSA-related videos on the website indicate that they are "Spanish captioned;" however, there are no Spanish captions on the videos. While this is not a comment related directly to the form, TG encourages the Department to provide these videos in Spanish, or to include Spanish captions on the current videos.</p> <p>3. Page 2, Section "Notes for question 22": provides a link to register for the Selective Service online or print a form. For students who do not have access to a computer, TG suggests adding a sentence at the end of the section, stating that "Forms are available at your local U.S. Post Office."</p> <p>4. Page 3, question 13: Remove the "@" symbol from the email data boxes, as the symbol is unnecessary and may not be appropriately positioned in the space provided on the form.</p>	Carol Lindsey	<p>1. Resolved. No Change.</p> <p>2. Forwarded to Appropriate Business Unit.</p> <p>3. Resolved.</p> <p>4. Resolved.</p> <p>5. Resolved.</p> <p>6. Resolved. No Change.</p> <p>7. Resolved.</p>	<p>1. The fonts displayed on the paper version of the <i>Free Application for Federal Student Aid (FAFSA®)</i> vary in size. To uniformly use an 11-pt. font would reduce the readability of the paper FAFSA.</p> <p>2. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>3. The Department of Education has made the requested change to the paper <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>4. The Department of Education has made the requested change to the paper <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>5. The Department of Education has made the requested change to the paper <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>6. The Department of Education believes that the guidance provided is adequate.</p> <p>7. <u>Refer to comment #27 for resolution.</u></p>

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	<p>5. Page 6, question 69: Remove the "@" symbol from the email data boxes, as the symbol is unnecessary and may not be appropriately positioned in the space provided on the form.</p> <p>6. Page 10, Section entitled "How do I find out what my Expected Family Contribution (EFC) is?": TG suggests revising the last sentence as follows: "Make corrections... as necessary, at www.fafsa.gov." TG also suggests providing a phone number for an applicant without access to a computer to obtain the EFC.</p> <p>7. Comment: It is important for the Department to review the instructions provided in Step Six of the FAFSA, in light of the Department's current practice of sharing the full list of colleges, in the order provided by the applicant, with all of the colleges listed and with state agencies involved in awarding student aid. Last year, the National Association for College Admission Counseling (NACAC) expressed concern that some colleges and states use the "FAFSA position" (college listing order) as a factor in making admissions and non-federal financial aid decisions. Most applicants are unaware that the college list and FAFSA position are used to influence these important decisions, in some cases. In response to NACAC's concerns about potential uses of this information, Inside Higher Ed reported in October 2013 that the Department indicated it planned to review its long-standing practice of sharing the full list and FAFSA position with all colleges listed. Since the language in Step Six of the proposed 2015-2016 FAFSA has not changed, it is unclear if the</p>			

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	<p>Department has decided to continue this practice. Therefore, TG offers some suggested instructional language for Step Six to address both scenarios.</p> <p>A. If the Department decides to discontinue sharing the entire college list and FAFSA position, the instructions for Step Six could be revised as follows: Current: "Step Six (Student): Indicate which colleges you want to receive your FAFSA information...For state aid, you may wish to list your preferred college first." -3- Proposed: "Step Six (Student): Indicate which colleges you want to receive your FAFSA information... For state aid, you may wish to list your preferred college first."</p> <p>B. If the Department elects to continue sharing the entire college list and FAFSA position, the instructions for Step Six should be revised to better inform applicants that the order in which colleges are listed may influence some colleges' admissions and non-federal aid decisions. The instructions could be revised as follows: Current: "Step Six (Student): Indicate which colleges you want to receive your FAFSA information...For state aid, you may wish to list your preferred college first." Proposed: "Step Six (Student): Indicate which colleges you want to receive your FAFSA information...Note that the order in which you list colleges may influence admissions and non-federal financial aid decisions."</p>			
71.	<p>As has been reported in the media, some colleges use the list of colleges that students supply on their FAFSA forms in an attempt to ascertain the students' likelihood of attending the institution if accepted. Specifically, colleges make note of the order in which students list</p>	David Hawkins (NACAC)	Resolved.	<u>Refer to comment #27 for resolution.</u>

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	<p>the institutions to which their results are to be sent and assume that the order conveys evidence of the student's preference. NACAC has been able to confirm independently that some colleges use the FAFSA college lists for recruitment and admission purposes. NACAC also confirmed through contact with its colleges and with the Office of Federal Student Aid (FSA) that the college lists are routinely provided to colleges, along with the other information submitted by students via the FAFSA. While colleges regularly use information supplied by students, either directly to the college or voluntarily through lead generation sources (such as the agencies that administer the SAT/ACT admission tests and various online college information Web portals) for the purpose of identifying a student's demonstrated interest in attending, students are made aware upon submission of their personal information that the information will be shared with colleges for use during the recruitment and admission process. However, students are not made aware that information supplied via the FAFSA may be used by colleges in the recruitment and admission process—only that the information will be used in the process of administering financial aid.</p> <p>Concerns</p> <p>The association believes that students should not be compelled by colleges to disclose their college preferences during the application process. NACAC's Statement of Principles of Good Practice (SPGP) – the standards by which the association's more than 13,000 members operate -- dictates that member colleges shall not require or ask candidates or the secondary schools to indicate the order of the candidates' college or university preferences (SPGP Mandatory Practice, Section II.B.2)</p>			

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	<p>While students may volunteer this information, the association believes that a student's right to keeping such information private is an integral part of maintaining a fair admission process. In the past, NACAC has found that institutions exercised leverage over students by asking them to disclose their college preferences, forcing students into the uncomfortable situation of disclosing information that could count against them in the application review process, or being less-than-truthful on their application about their preferences.</p> <p>As evidenced by media reports and our initial inquiries into the matter, colleges are utilizing the information disclosed by students without their knowledge or consent to make informed guesses about the students' college preferences. We believe this interferes with students' ability to navigate the admission process in as fair a manner as possible. NACAC believes that the FSA could remedy this situation by simply not disclosing the students' college lists to colleges.</p> <p>NACAC has communicated with the National Association of Financial Aid Administrators (NASFAA) and the National Association of State Student Grant and Aid Programs (NASSGAP) about this issue to ensure that we are not recommending a course of action that would affect their ability to effectively and efficiently administer federal and state aid to students.</p> <p>We understand from these conversations that the student lists are an important component in administering state aid programs in some states. However, we maintain that in the interest of students, FSA modify the FAFSA in one of the following ways:</p> <ol style="list-style-type: none"> 1. Refrain from sending students' college lists to the 			

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	<p>colleges; or</p> <p>2. Inform students that their lists can be sent to colleges (preferably in alphabetical or random order), and allow students to either opt-in or opt-out of such a transmission.</p> <p>The association further requests that FSA and the Department provide clear guidance to institutions pertaining to 20 USC Section 1090 (a)(3)(E), which specifically states that the data collected through the form “shall be used only for the application, award, and administration of aid awarded under this subchapter and part C of subchapter I of chapter 34 of title 42, State aid, or aid awarded by eligible institutions or such entities as the Secretary may designate” (the full text of the relevant section is below). Statute suggests that using the list of colleges that students supply to try to determine a student’s likelihood of attending a college falls outside the permissible use of the data.</p> <p>U.S. Code, Title 20 Education Chapter 28 Higher Education Resources and Student Assistance Subchapter IV Student Assistance Part F General Provisions Relating to Student Assistance Programs § 1090. Forms and regulations [HEA § 483]</p> <p>(a)(3)(E) Privacy</p> <p>The Secretary shall ensure that data collection under this paragraph complies with section 552a of title 5 and that any entity using the electronic version of the forms developed by the Secretary pursuant to this paragraph shall maintain reasonable and appropriate administrative, technical, and physical safeguards to ensure the integrity and confidentiality of the information, and to protect against security threats, or unauthorized uses or disclosures of the information</p>			

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	<p>provided on the electronic version of the forms. Data collected by such electronic version of the forms shall be used only for the application, award, and administration of aid awarded under this subchapter and part C of subchapter I of chapter 34 of title 42, State aid, or aid awarded by eligible institutions or such entities as the Secretary may designate. No data collected by such electronic version of the forms shall be used for making final aid awards under this subchapter and part C of subchapter I of chapter 34 of title 42 until such data have been processed by the Secretary or a contractor or designee of the Secretary, except as may be permitted under this subchapter and part C of subchapter I of chapter 34 of title 42.</p>			
72.	<p>1. It would be very helpful to families who are rolling over retirement funding to receive some type of notice after using the IRS DRT to double check and remove any rollover amount before being able to move on to the next screen. Also if they do adjust the amount in these two questions they should no lose their 02 code on the ISIR.</p> <p>2. I have had cases of families where the parents are separated or the parent is widowed but they filed a joint return not having the option to use the IRS DRT. If they filed a joint return and then changed their marital status over the year can we still allow for them to use the IRS DRT. I do not think their marital status should impact on whether or not the IRS DRT is available. It should only be the qualifying questions that are asked before linking to the IRS site.</p> <p>3. Parents who forget to sign a FAFSA and then need to go back in and add a signature after selecting "make</p>	Tori Weigant	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p> <p>3. Resolved. No Change.</p> <p>4. Resolved.</p>	<p>1. <u>Refer to comment #25.3 for resolution.</u></p> <p>2. In the case cited, a parent who is separated or widowed but filed a joint tax return would incorrectly transfer income information for him/herself as well as his/her former spouse or deceased spouse. This would result in incorrect reporting of financial information used to calculate the Expected Family Contribution (EFC). When using <i>FAFSA on the Web</i>SM, a student or parent who reports a marital status date of January or later will not be given the option to use the IRS Data Retrieval Tool (IRS DRT) because the marital status changed after the tax return was filed. The marital status date is one of several indicators that data transferred using the IRS DRT may not accurately reflect what the student or parent needs to report on the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p>

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	<p>corrections" are not being presented the signature option unless they make a change to the FAFSA. This has been resulting in parents submitting multiple transactions with no signature. If the initial was not signed can the signature option be presented after selecting "make corrections' even if they have no other change.</p> <p>4. We had several families mark that they filed a 1040X who did not when answering the qualifying questions for the IRS DRT. Would it be possible to add to this question- "Did you revise your tax return after filing the original?" so it is more clear to those who are not familiar with the 1040X Amended Return.</p>			<p>3. An Expected Family Contribution (EFC) cannot be calculated on a <i>Free Application for Federal Student Aid</i> (FAFSA®) for a dependent student when the application is not signed by a parent. The logic used by <i>FAFSA on the Web</i>SM (FOTW) requires that a parent signature be added to the FAFSA before any correction can be submitted.</p> <p>4. <u>Refer to comment #15 for resolution.</u></p>
73.	<p>1. First, the FAFSA needs to become more teenager friendly.</p> <p>2. Furthermore, students should be able to explain special circumstances in a paragraph or two.</p> <p>3. Many students live with family members that do not support them. In fact, I have many students that many have a parent that is married to a non-biological parent that does not intend to contribute to the student's education, yet their income is used as a basis to determine financial need/eligibility.</p> <p>4. Lastly, and also related to making the fafsa more user friendly...there should be explanations for questions that pop up where you can proceed so that the adolescents can read prior to making the wrong selection.</p>	Norma Feriz-Gordon	<p>1. Resolved. No Change.</p> <p>2. Resolved. No Change.</p> <p>3. Resolved. No Change.</p> <p>4. Resolved. No Change.</p>	<p>1. The Department of Education is required by law to use Plain Language (also called Plain English) in order to communicate clearly and effectively with the intended audience. The <i>Free Application for Federal Student Aid</i> (FAFSA®) is written using Plain Language.</p> <p>2. The Department of Education does not mandate how students should provide special circumstance details to any school. This is determined by each school, and each school communicates that information to their students as needed.</p> <p>3. The parent financial questions are statutorily required by the Higher Education Act; therefore, applicants in this situation must provide this information.</p> <p>4. In <i>FAFSA on the Web</i>SM, instructions are provided</p>

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				for each <i>Free Application for Federal Student Aid</i> (FAFSA®) question in the Help and Hints section on the right side of the page.
74.	<p>1. From a broad perspective, we urge the Department of Education (ED) to move forward in implementing the use of prior-prior year (PPY) income in the application process, as permitted by current statute. By using income data from two years prior in the need analysis formula, students would be able to file the Free Application for Federal Student Aid (FAFSA) much earlier than the date the FAFSA currently becomes available- January 1. In fact, under PPY it would be possible to align the admissions and financial aid application processes, offering more time for students and families to evaluate award offers from institutions and make an informed decision about where to attend college. Additionally, the use of PPY could enhance the use of the Internal Revenue Service’s Data Retrieval Tool (IRS-DRT). The IRS-DRT has been a great step forward in application simplification as it allows applicants to import their tax information from the IRS. But using only prior-year tax information – as we do today – prevents many families from utilizing this time-saving tool because taxes aren’t usually completed by the time a family applies for financial aid. A move to PPY would significantly increase the number of applicants who are able to utilize the IRS-DRT and help families skip other burdensome application requirements such as income verification.</p> <p>2. Increased use of the IRS-DRT is a key component in application simplification efforts. WE encourage ED to continue its collaboration with the IRS, further integrating the work of the two agencies and exploring new technologies to enhance the IRS-DRT and improve</p>	Karen McCarthy, NASFAA	<p>1. Resolved. No Change.</p> <p>2. Resolved..</p> <p>3. Resolved. No Change.</p> <p>4. Resolved. No Change.</p> <p>5. Resolved.</p> <p>6. Resolved.</p> <p>7. Resolved. No Change.</p> <p>8. Resolved.</p>	<p>1. Refer to comment #37 for resolution.</p> <p>2. The Department of Education will continue its collaboration with the Internal Revenue Service to explore ways in which to further enhance the IRS Data Retrieval Tool..</p> <p>3. Refer to comment #27 for resolution.</p> <p>4. Refer to comment #63.4 for resolution.</p> <p>5. Refer to comment #15 for resolution.</p> <p>6. Refer to comment #25.2 for resolution.</p> <p>7. Refer to comment #18 for resolution.</p> <p>8. Refer to comment #1 for resolution.</p>

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	<p>its efficiency.</p> <p>3. We are aware that ED is contemplating the continued inclusion of the school listing in the Institutional Student Information Record (ISIR). We share others' concerns about possible use of the school listing for purposes of awarding financial aid, especially given that students are not made aware that all listed schools receive the school list. However, we do not recommend complete removal of the school listing from the ISIR, since some institutions use the school listing in their fraud prevention efforts, most frequently to investigate unusual enrollment histories. We want to support institutions' efforts at fraud prevention, which is a high priority for taxpayers. To meet the goal of fraud prevention and prevent unscrupulous behavior by some institutions, we recommend retaining the school listing, but in a randomized or alphabetical order, and notifying applicants during FAFSA completion that the school list is sent to all institutions selected by the student.</p> <p>4. In recent years, the aid community has been focused on improving the FAFSA itself. It is now time for ED to improve the Student Aid Report (SAR), which has long been overlooked as a key communication tool in the financial aid process. The layout, readability, and general user-friendliness are all in need of a complete overhaul.</p> <p>5. On FAFSA on the Web (FOTW), in order to determine if the IRS data retrieval (DRT) tool can be used, students and parents are prompted with preliminary questions, including one asking if they have amended their taxes. A significant portion of applicants erroneously indicate that they have filed an amended tax return, thus</p>			

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	<p>precluding their use of the IRS DRT. Revised wording defining the meaning of amending taxes, stated in terms of having filed a 1040X, may clarify this question and help parents/students choosetheir answer correctly.</p> <p>6. IRS DRT Qualifying Questions: Based on your response, we recommend that you transfer your information from the IRS into this FAFSA. This timesaving process may satisfied tax documentation requirements at your school. The current wording does not encourage use of the IRS DRT in strong enough language, nor does it explain the benefits to the FAFSA filer of using the DRT.</p> <p>7. Page 3: Highest School completed by Parent 1, Highest School completed by Parent 2. The concept of Parent 1 and Parent 2 is first introduced in questions 24 and 25, yet the explanation of who is considered a parent for FAFSA purposes doesn't appear until the instructions before question 59. We recommend instructions or a cross-reference to instructions be added to questions 24 and 25.</p> <p>8. Page 3: High school diploma, or foreign school equivalent: Question #26 should have an option for 'Foreign High School Credential.' Although there is a "foreign country" option in the following questions about the location of the school where the high school diploma was earned, many applicants with foreign credentials are unaware that they should select "high school diploma" in the preceding screening question.</p>			
75.	1. Decreasing Student Burden via FAFSA Simplification Student burden can be significantly decreased, if not entirely eliminated, by further simplification of the	Carrie Warick (NCAN)	1. Resolved. No Change.	1. The Department of Education uses skip logic in combination with other functions in <i>FAFSA on the Web</i> SM to present applicants with the appropriate

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	<p>FAFSA form to the minimum data elements required to adequately determine a student's eligibility for federal student aid. Research shows that federal student aid awards can be accurately calculated using only two data elements: family size and adjusted gross income. NCAN advocates for a FAFSA using only those two elements, easily available through the IRS Data Retrieval Tool.</p> <p>2. Decreasing Student Burden via Prior Prior Year Currently the FAFSA form requires income information from the previous tax year or one year prior. However, the Higher Education Act of 2008 gives the Secretary of Education discretion to use the second preceding year of tax information. NCAN recommends using the second preceding tax year (known as prior prior year) to allow students to file their FAFSA form faster and more accurately. The improvements listed below would apply whether or not the number of questions on the FAFSA is significantly reduced, as suggested above.</p> <p><u>Eases Pressure on Early Deadlines</u> Institutional priority deadlines for completing the FAFSA are frequently as early as February 15. Several states also have filing deadlines prior to the April 15 tax deadline. Students often miss these early deadlines or use poorly estimated information resulting in inaccurate eligibility measures because they do not have the necessary tax information in time. Using prior prior tax year information would allow students to meet deadlines using accurate information.</p> <p><u>Easier Use for IRS Data Retrieval</u> The addition of the IRS Data Retrieval Tool (IRS DRT) has improved the ease with which students complete the</p>		<p>2. Resolved. No Change.</p> <p>3. Resolved. No Change.</p>	<p>questions needed to complete the form. The skip logic aids in the reduction of the individual application burden, which is defined as the time it takes an applicant to prepare or review, complete and submit the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>2. <u>Refer to comment #37 for resolution.</u></p> <p>3. <u>Refer to comment #27 for resolution.</u></p>

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	<p>FAFSA. However, in order to use this tool, students must wait at least two weeks after their families' taxes have been filed. Switching to prior prior year tax data would allow all students whose families are required to file federal taxes to immediately complete the FAFSA using the IRS DRT. Using this tool decreases the burden to the student and family.</p> <p><u>Reduced Chance of Verification</u> The increased use of the IRS DRT would decrease the number of students who are flagged for verification. Needing to verify the information from the FAFSA is a common barrier for low-income students as they believe they are done and then are asked acquire a tax transcript. In recent years, the IRS has performed maintenance on its website during the very time that students needed to retrieve their transcripts. Using prior prior year data would alleviate many of these timing concerns for the IRS as well as allow more students to use the IRS DRT to prevent verification.</p> <p><u>Award Over Time Virtually the Same</u> For a bachelor's degree student up to six years of income data is used to determine their aid awards. Switching to prior prior year will still use up to six years of income data with only one year of those data, the first year, being different over the course of their education. Further, census data show that most families who qualify for need-based aid are not seeing an increase in income over time meaning their awards should not vary dramatically.</p> <p>3. Clarifying the Schools Submitted Section via Randomized Lists</p>			

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	<p>When students complete the FAFSA form, they list the schools to which their information should be sent. Currently, this list, including the order in which schools are entered, is shared with all schools to which the student is applying. Some institutions correctly or incorrectly use this order to indicate a student's school preference and adjust aid packages based on those assumptions. As highlighted in a recent Inside Higher Education article, enrollment consulting firm Noel-Levitz confirmed that the order of the schools on the FAFSA does have predictive power regarding student preferences. If admitted, 62% of students will attend the first school on their FAFSA list. For admissions at second place schools on the list, 21% will attend and about 15% at third place schools. The following seven schools all hover around 10% each. The predictive power of this list is concerning for two reasons: 1) the FAFSA lacks clarity on the fact that this list is shared with all institutions and 2) the extent to which enrollment and financial aid offices use this information is unknown.</p> <p>The easiest way to address both of these problems at once is to stop sharing information on which schools students are sending their FAFSA information to with the other schools. However, if this information is to be continued to be shared, at the least, the FAFSA instructions must be updated to inform students that this information will be shared. This will greatly increase the clarity of purpose of this section of the form. An additional improvement would be to put the list in a random order, alphabetically, or to sort them by FSA code so that institutions could not (correctly or incorrectly) infer the intentions of a student based on the school order list on the FAFSA form.</p>			

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76.	<p>1. Questions #1 and #2. Suggestion: Change the heading by adding “do not add an apostrophe or hyphen unless it is included in your name on your ssn card”.</p> <p>2. Question #4. Suggestion: Add “permanent” or “home” to the heading; some students enter their email address on this line.</p> <p>3. Question #8. Suggestion: Add “use your social security card to enter your correct number here” because too many students enter an incorrect number (transpose, reverse numbers or one number off).</p> <p>4. Question #9. Suggestion: Add “exactly as it appears on your birth certificate”.</p> <p>5. Question #10. Why not ask for student’s student cell number in addition to or instead of a permanent telephone number? Many students no longer have a permanent telephone number. Cell numbers would also make sending text messages an option.</p> <p>6. Add information regarding the new PIN process/changes.</p> <p>7. Question #16. What is your marital status as of today? – Suggestion: Change the first response from “I am single” to “I have never been married” to mirror marital status options for parents (#59).</p>	Jason Chavez (NASSGAP)	<p>1. Resolved. No Change.</p> <p>2. Resolved.</p> <p>3. Resolved.</p> <p>4. Resolved. No Change.</p> <p>5. Resolved.</p> <p>6. Resolved.</p> <p>7. Forwarded to Appropriate Business Unit.</p> <p>8. Resolved. No Change.</p> <p>9. Resolved. No Change.</p> <p>10. Resolved. No Change.</p> <p>11. Resolved. No Change.</p> <p>12. Resolved. No Change.</p>	<p>1. The Department of Education considers this suggestion a stylistic preference.</p> <p>2. <u>Refer to comment #6 for resolution.</u></p> <p>3. The first sentence in the Notes for question 8 on page 2 has been updated to read: “Enter your Social Security Number (SSN) as it appears on your Social Security card.”</p> <p>4. The Department of Education considers this suggestion a stylistic preference.</p> <p>5. Question #10 has been updated to read: “Your telephone number”</p> <p>6. Where appropriate, references to the PIN have been updated to reference the new FSA ID.</p> <p>7. The Department of Education has referred this recommendation to the appropriate business unit for review.</p> <p>8. The Department of Education believes that the guidance provided is sufficient.</p> <p>9. The Department of Education believes that the reference to specific IRS Form line numbers provides sufficient guidance.</p> <p>10. <u>Refer to comment #62.1 for resolution.</u></p>

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	<p>8. 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.”</p> <p>9. Questions #37 and #86. Enter your/your parents’ income tax for 2014. – 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.</p> <p>10. 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.</p> <p>11. Question #44d. Student’s Additional Financial Information – taxable student grant and scholarship aid – Suggestion: Add the comment, “Consult your tax advisor.” Many students erroneously report grant and scholarship aid as income.</p> <p>12. Step Three (Student) – Suggestion: Change the heading by adding “Information” to the parenthetical phrase, as in “(Student Information).”</p> <p>13. Step Four (Parent) – Suggestion: Change the heading</p>		<p>13. Resolved. No Change.</p>	<p>11. The Department of Education believes that the guidance provided is sufficient.</p> <p>12. The Department of Education considers this suggestion a stylistic preference.</p> <p>13. The Department of Education considers this suggestion a stylistic preference.</p>

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	by adding "Information" to the parenthetical phrase, as in "(Parent Information)."			