

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

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

#	Comment	Commenter	Status	Resolution
1.	When loading FAFSA information, I am seeing an increase in the number of students who enter their email address in the street address field. Adding an edit on the street address field when an @ symbol is entered could help with these entry errors.	Anita Ford	Resolved. No Change.	Question #4 on the <i>Free Application for Federal Student Aid</i> (FAFSA®) reads: "Your permanent mailing address"; the Department of Education believes the guidance provided is adequate.
2.	Perhaps you could enhance the skip logic for means-tested federal benefit programs to not only skip the questions if AGI is \$50,000 or more, but also if AGI exceeds the highest percentage of the poverty line (based on family size) eligible for any of the benefits (which I believe is 185% of the poverty line). Because of the two-year lookback, this skip logic will be limited to applicants who filed the FAFSA during the previous year as well.	Mark Kantrowitz	Forwarded to Appropriate Business Unit.	The Department of Education has referred this recommendation to the appropriate business unit for review.
3.	When an applicant is filing the FAFSA for the second of two consecutive award years, the availability of data from two applications may present other opportunities for skip logic or for enhancing the risk model used to select applications for verification. For example, data elements that have changed and the magnitude of the changes in numeric data elements may be useful indicators of potential errors. This may especially be true when the data elements change in a manner that significantly reduces the EFC.	Mark Kantrowitz	Forwarded to Appropriate Business Unit.	The Department of Education has referred this recommendation to the appropriate business unit for review.
4.	The U.S. Department of Education's response to comment #27, concerning college's use of the order in which schools are listed on the FAFSA, is inadequate.  Section 483(a)(3)(E) of the Higher Education Act of 1965	Mark Kantrowitz	Forwarded to Appropriate Business Unit.	The Department of Education has referred this recommendation to the appropriate business unit for review.

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	<p>[20 USC 1090(a)(3)(E)] specifically states that FAFSA information may not be used for any purpose other than the awarding and administration of student financial aid. Quoting "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."</p> <p>While this language doesn't preclude colleges from using the list of colleges and the order in which the colleges are listed to influence the awarding of institutional aid, it does preclude using this information for college admissions decisions.</p> <p>Perhaps the U.S. Department of Education should distribute a Dear Colleague Letter to colleges to remind them that this statutory requirement precludes them from using the list of colleges on the FAFSA for college admissions decisions, directly or indirectly.</p>			
5.	<p>Please consider adding a checkbox to the FAFSA (online and paper/PDF) which applicants can use to indicate that they are affected by special/unusual financial circumstances. The instructions could like the statutory examples and highlight that special circumstances include significant changes in ability to pay from one year to the next (e.g., primary wage-earner lost a job) as well as unusual situations that differentiate the applicant from the typical applicant (e.g., high dependent care costs for a special needs child or elderly parent, high unreimbursed medical/dental expenses). This would allow colleges to proactively contact applicants affected</p>	Mark Kantrowitz	Resolved. No Change.	Special and unusual circumstances are conditions that differentiate an individual student from a class of students, rather than conditions that exist across a class of students. Since each institution interprets a special or unusual circumstance differently, the Department of Education leaves this determination up to each individual institution.

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	by special circumstances to provide information about the college's forms and procedures.			
6.	<p>There is an inconsistency in the 1040/1040A/1040EZ line numbers in the instructions for lines 37 and 86. The draft FAFSA specifies lines 56 of IRS Form 1040, 39 of IRS Form 1040A and line 10 of IRS Form 1040EZ. But line 10 of IRS Form 1040EZ is before addition of line 11 (Health care: individual responsibility) to yield line 12, line 39 of IRS Form 1040A is after the addition of line 38 (Health care: individual responsibility) and line 56 of IRS Form 1040 is before the addition of line 61 (Health care: individual responsibility).</p> <p>To be consistent in excluding the individual responsibility items, one would need to use line 37 of IRS Form 1040A.</p> <p>If the goal were to include the individual responsibility items, the instructions would need to refer to line 12 of IRS Form 1040EZ, line 39 of IRS Form 1040A and the sum of lines 56 and 61 of IRS Form 1040.</p> <p>This comment is based on the publicly available draft versions of IRS Forms 1040/1040A/1040EZ, available on 11/22/2014 at <a href="http://www.irs.gov/pub/irs-dft/f1040--dft.pdf">http://www.irs.gov/pub/irs-dft/f1040--dft.pdf</a>, <a href="http://www.irs.gov/pub/irs-dft/f1040a--dft.pdf">http://www.irs.gov/pub/irs-dft/f1040a--dft.pdf</a>, and <a href="http://www.irs.gov/pub/irs-dft/f1040ez--dft.pdf">http://www.irs.gov/pub/irs-dft/f1040ez--dft.pdf</a>.</p>	Mark Kantrowitz	Resolved.	Question #s 37 and 86 on the <i>Free Application for Federal Student Aid (FAFSA®)</i> have been updated to reference 1040A line 37.
7.	Please clarify on the FAFSA instructions that "Investments include real estate (do not include the home in which you live), rental property/ies (includes a unit within a family home that has its own entrance, kitchen, and bath rented to someone other than a family member), trust funds, UGMA and UTMA accounts, money market funds, mutual funds, certificates of	Anonymous	Resolved. No Change.	The Notes on Page 2 of the <i>Free Application for Federal Student Aid (FAFSA®)</i> for question #s 42 and 91 are meant to give examples of investments for applicants and their parents, and are not necessarily all-inclusive.

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	deposit, stocks, stock options, bonds, other securities, installment and land sale contracts (including mortgages held), promissory notes, commodities, etc. Includes business rental property/ies" that is/are not part of a formally recognized business (i.e. a hotel and/or motel and usually provides additional services like regular cleaning, linen, or maid service).			
8.	Multiple government programs require the disclosure of Taxable Income to determine eligibility for services for low-income students (one example is TRIO where taxable income levels are compared to the poverty levels). Since the FAFSA already requires Adjusted Gross Income that needs to be looked up from a tax return it would be very beneficial to also collect taxable income so that students who are eligible for additional support services can be more easily identified and served. Thank you.	Gaurav Khanna	Resolved. No Change.	Currently, the Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process.
9.	FAFSA-on-the-Web (FOTW) instructions for untaxed income could be improved by listing the most common types of untaxed income, specifically contributions to tax deferred savings plans, without the applicant having to click on the question. FAFSA filers seem to frequently skip the untaxed income questions, leaving them all blank, because they incorrectly conclude they have no untaxed income. Listing common examples where the filer can easily see them would improve the accuracy of information reported on the FAFSA.	Anonymous	Forwarded to Appropriate Business Unit.	The Department of Education has referred this recommendation to the appropriate business unit for review.
10.	A few years ago, the Department of Education removed the question that asked what the student's intended enrollment status was going to be for each term. I've never understood why this question was removed. This	Anonymous	Resolved. No Change.	The enrollment status question was removed for the 2011-2012 cycle. The rationale for this change is that, at the point in which a student is applying for aid, students have indicated that they do not

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	<p>then requires that the institution use an institutional application to gather the student's intended enrollment for each term... or guess at what their intended enrollment status will be. Please add this question back to the FAFSA. Thanks for your consideration.</p>			<p>know what their enrollment status will be and often do not understand the enrollment status terms that may vary from college to college, and therefore end up reporting an incorrect enrollment status. Additionally, the Department of Education believes that students may be able to make better decisions about college affordability if they are able to see the full amount of aid they would be able to receive. The Department of Education encourages schools to review their administrative processes to account for the elimination of this question and to understand how they can gather a more accurate enrollment status for the student.</p>
11.	<p>There should be a place on the application in which extreme financial burden situations that are directly affecting the student's financial eligibility can be noted and possibly considered.</p>	Gracie Trevino	Resolved. No Change.	<p><a href="#">Refer to Comment #5 for resolution.</a></p>
12.	<p>Insert the following sentence after the statement in the first box of both the SAR and SAR Acknowledgement which reads The school(s) listed on your FAFSA will receive your information.</p> <p>The school(s) listed on your FAFSA will receive your information.</p> <p>In order to complete your application and process your award offer, your school(s) may request you to complete institutional financial aid documents and/or provide additional information.</p> <p>My reasons for suggesting this insertion are the following:</p>	Patrick Moore	Resolved. No Change.	<p>The Department of Education believes the information provided on the SAR and the SAR Acknowledgement, as well as on the "Confirmation" page and "My FAFSA" page in <i>FAFSA on the Web</i><sup>SM</sup>, adequately informs students that they may be asked by their college to provide additional information.</p>

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	<p>1. Often students are under the impression that, in spite of the statements on the FAFSA, once their FAFSA has been received by the institution, they are done.</p> <p>2. They often come to our office unsure of what they need to do; I believe that this statement (or something similar) would help students to know what the next step(s) will be.</p>			
13.	<p>While ED has apparently heard and understood community comments regarding the "false amendment" indicators we are getting (thank you), I believe this issue has less to do with the wording and more to do with the placement on the page of the question(s).</p> <p>From helping students and parents file the FAFSA this year, it is clear to me that the fact that the filer is told in bold "You may be able to use the IRS Data Retrieval Tool to view and transfer your tax information from the IRS." - and then immediately asked a Yes/No question about amendments is causing the filer to not completely read the statement about amendments and to think they are answering a question related to the bold statement (like "Would you like to try to use the DRT to transfer your tax info?").</p> <p>If the eligibility for DRT questions were simply separated from the bold statement about using DRT, I believe it would help tremendously. See attached file for more detail.</p>	Melet Leafgreen	Resolved. No Change.	<p>The Department of Education does not believe that the proximity of the "amended" question to the bolded statement that precedes it is an issue. The bolded statement uses the qualifier "may", which indicates users may, or may not, be eligible to use the IRS Data Retrieval Tool.</p> <p>For 2015-2016, the "amended" filtering question will be updated on <i>FAFSA on the Web</i><sup>SM</sup> to read:</p> <p>"Did you file a Form 1040X amended tax return?"</p> <p>Additionally, the associated help text and "Help and Hints" will be updated with the reference to "1040X", to clarify the definition of an amended tax return.</p>

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	Thank you.			
14.	<p>1. The application should contain the list of household members and their relationship/age/college attending. This would resolve the most common verification error - the household members not matching what was outlined in the FAFSA form.</p> <p>2. The application should also ask independent students for their spouse detail (name/SSN/DOB) so that perhaps in the future, the IRS download can be updated to include spouses who may be filing separately.</p>	Karen Griffin	Resolved. No Change.	<p>1. This information is not required to calculate an EFC, and therefore is not requested on the <i>Free Application for Federal Student Aid (FAFSA®)</i>. Schools are encouraged to collect this information on a Verification Worksheet when the data is needed.</p> <p>2. Currently, the demographic information for an independent student's spouse is not required to calculate an EFC, and therefore is not requested on the FAFSA. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process.</p>
15.	Many students who have completed high school equivalency in a foreign country do not select "high school diploma" for question 26. Because it is not referred to as a "diploma" or "high school" in their country, it confuses them and they instead mark "none of the above." This creates problems where we have to request proof of high school completion, and the student is often times unable to obtain it from the foreign country, or it takes them a really long time. My suggestion is this: add an answer option for "completed high school equivalent in a foreign country." This will relieve this issue entirely, and allow these students to receive the financial aid they are entitled to more quickly.	Monica Rodriguez	Resolved.	<p>The Department of Education will modify <i>FAFSA on the Web</i><sup>SM</sup> 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><b>"High school diploma</b> 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>
16.	Although the request was seeking comments for the paper FAFSA, it would be extremely helpful if the high	Candance Frazier	Resolved. No Change.	A response to Question #26 (high school completion status) is required on <i>FAFSA on the</i>

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	<p>school fields (questions 26 &amp; question 27, if they answer 26) were required on the electronic application. Since this information is required for Direct Loan and Pell processing, it only seems logically that these would require an answer. Thank you for considering this request.</p>			<p>Web<sup>SM</sup> (FOTW). If an applicant attempts to leave the page without selecting a response to this question, a message displays at the top of the page that states: "You must enter a response for "High School or Equivalent Completed?" before proceeding to the next page. Select the field to see valid responses for this question." The applicant is not allowed to proceed to the next page until this question is answered.</p> <p>If the applicant selects "High School Diploma" as the response, he or she must enter a high school on the next page.</p>
17.	<p>Please instruct students and parents who are completing the FAFSA and have multiple real estate properties on how to properly calculate and report net worth. The majority of families add the values of the multiple properties and the debt against those properties to calculate net worth. If one of more of the multiple properties has a negative net worth, they don't use \$0. They use the negative net worth of one property against the positive net worth of the other property(ies). Please give them an example on how to properly calculate net worth when they own multiple real estate properties with negative and positive net worth. Thank you!</p>	Anonymous	Forwarded to Appropriate Business Unit.	The Department of Education has referred this recommendation to the appropriate business unit for review.
18.	<p>The National Association for the Education of Homeless Children and Youth (NAEHCY) submits these comments on the 2015-2016 Free Application for Federal Student Aid (FAFSA) in response to the notice of invitation for public comment issued in the Federal Register.</p> <p>NAEHCY is a national membership association dedicated to educational excellence for children and youth</p>	Barbara Duffield, NAEHCY Director of Policy and Programs	Resolved. No Change.	The <i>Free Application for Federal Student Aid</i> (FAFSA <sup>®</sup> ) 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.



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	<p>experiencing homelessness. Through state and federal policy and technical assistance to our members, students, and the public, we change systems so all children and youth can learn, succeed academically, and achieve their dreams.</p> <p>Since the passage of the College Cost Reduction and Access Act (CCRAA) in 2007, NAEHCY has worked tirelessly to educate high school counselors, McKinney-Vento homeless liaisons, college access program staff, financial aid administrators, and young people about the CCRAA provisions related to homeless youth. In 2014 alone, we have responded to over 900 calls on our higher education helpline, conducted 30 trainings and webinars, and conducted in-depth work with higher education institutions and staff through our statewide higher education networks in 14 states. These experiences have allowed us to gather detailed information about the areas in which the FAFSA erects barriers to unaccompanied youth obtaining the financial aid for which they are eligible.</p> <p>We have focused our comments on the single most significant of these barriers: the FAFSA's definition of youth. We strongly recommend deleting this definition from the FAFSA, or in the alternative, defining youth as 23 years of age or younger.</p> <p>Unaccompanied homeless youth live in a variety of temporary situations, including shelters, the homes of others, cars, campgrounds, public parks, abandoned buildings, motels, and bus or train stations. Due to their severe poverty, they are extremely unlikely to be able to</p>			

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	<p>access postsecondary education without federal student aid. These youth do not receive financial support from their parents and do not have access to parental information. Thus, despite their great need for financial assistance, unaccompanied homeless youth cannot supply the information required by the FAFSA and thus face almost insurmountable barriers to higher education.</p> <p>The CCRAA addressed this barrier by allowing youth to be considered independent students if they are verified as unaccompanied and homeless during the school year in which the application is submitted, or as unaccompanied, at risk of homelessness, and self-supporting. The CCRAA provides a clear, specific definition of unaccompanied youth, by referencing the definition in the McKinney-Vento Homeless Assistance Act. That definition does not include an age limit. For financial aid purposes, applicants generally are considered dependent until they turn 24. Therefore, it follows logically that unaccompanied youth should be covered by the CCRAAs independent student provisions until they turn 24.</p> <p>Inexplicably, in the notes for questions 56-58, the FAFSA creates its own definition of youth, which only includes applicants up to age 21. This definition goes against the plain language of the CCRAA and limits unaccompanied homeless youths independent student status by age. It creates an artificial gap for unaccompanied homeless youth who are 22 and 23 years old.</p> <p>Our extensive, direct experience with financial aid</p>			

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	<p>administrators, high school and school district staff, and youth themselves indicate that this definition is creating significant barriers for young people who are 22 and 23 years old. According to the Application and Verification Guide, unaccompanied homeless youth of this age must go through the dependency override process in order to obtain independent student status. This policy creates additional paperwork for financial aid administrators and erects barriers for students who are nearing completion of their degrees, as well as those who become homeless after age 21. It is burdensome for both students and financial aid administrators to have two different processes for establishing independent student status, one of which is categorical, while the other relies on a more subjective process that requires additional steps and paperwork.</p> <p>In order to fulfill the CCRAAs clear statutory language and ensure that all unaccompanied youth obtain the financial aid to which they are entitled, we strongly recommend either deleting this definition from the FAFSA, or defining youth as 23 years of age or younger. Either of these changes will align the FAFSA with the statutes clear intention to ensure access to financial aid for all unaccompanied homeless youth and those who are self-supporting and at risk of homelessness. Additionally, it will create clarity and alleviate paperwork for financial aid administrators.</p> <p>Thank you for considering our comments. Please do not hesitate to contact Barbara Duffield, , at 202.364.7392 or <a href="mailto:bduffield@naehcy.org">bduffield@naehcy.org</a>.</p>			

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19.	<p>1. Students/families are regularly confused by the tax questions b/c they often have a large file of tax documents from their tax preparer, and they don't know which tax document they should refer to. Prior to the first tax question, the help should offer something like, "Need help identifying your tax return?", and should provide a link to PDF samples of the standard tax return forms for that tax year (1040EZ, 1040, and 1040A). This will users identify which form they should look at to find their tax data.</p> <p>2. We could avoid most of the confusion with the new parent questions if we just reworded them to:            -Father/Stepfather/Parent 1            -Mother/Stepmother/Parent 2            Just using Parent 1 and Parent 2 is causing more confusion than the old format.</p>	David Horne	<p>1.Resolved. No Change.</p> <p>2.Resolved. No Change.</p>	<p>1. The Department of Education believes the current guidance is adequate. In addition, the IRS Data Retrieval Tool was created to facilitate this process for students and parents.</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 questions. Mother and Father questions were changed to Parent 1 and Parent 2 during the 2014-2015 cycle to allow for proper reporting of parent information when a student's legal parents are the same gender and are either unmarried and living together, or married/remarried.</p>
20.	<p>In response to public comment, the second draft of the FAFSA includes the following new text on the "School Selection" page: "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."            We appreciate the inclusion of the notification to the applicant, but we are concerned that the second</p>	Justin Draeger, NASFAA	Forwarded to Appropriate Business Unit.	The Department of Education has referred this recommendation to the appropriate business unit for review.

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	<p>sentence of the notification can be easily misinterpreted to suggest that it is possible for a school to receive all of an applicant's FAFSA data, except the school list. As student aid professionals, we recognize the impossibility of this scenario, but applicants completing the FAFSA for the first time are likely to be understandably confused by this sentence. Therefore, we recommend that the following sentence be removed: "If you don't want this information sent to a particular college, do not list that school on your FAFSA."</p>			