

2017-2018 Draft Free Application for Federal Student public comments and responses

#	Comments	Commenter	Responses
1.	<p>1. Now that the Department of Education has set one college sees only their name is there any reason why FAFSA cannot have more than ten college fields in the digital only FAFSA Form. May I suggest 50.</p> <p>2. Does the Department of Education and the IRS have changing the DRT to NOT shoe 16a 15a when the value is a rollover as set by the Department of Educations rules for filing the form</p>	Anonymous	<p>1. No Change. Department of Education research for the most recent year available (2014-2015) shows that 79% of applicants list just one school on their <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>9% list two colleges; 4% list three colleges; 3% list four colleges; 2% list five colleges; 1% list six, seven or eight colleges; 0% list nine colleges, and 1% list 10 colleges.</p> <p>An increase in the number of colleges on the FAFSA would require many system and Web site changes as well as a change to the file layout of the <i>Institutional Student Information Record (ISIR)</i>, which would impact the Central Processing System, software providers, and other systems with which the CPS interfaces. Based on the data, the Department of Education does not believe there is a strong need to make such changes at this time.</p> <p>2. No Change. When there are qualified rollovers, IRS guidance tells the tax filer to enter the word "Rollover" on the tax return next to line 15b or 16b. (Note that the corresponding line items for an IRS Form 1040A are 11a and 11b for IRAs, and 12a and 12b for pensions and annuities.)</p> <p>The IRS Data Retrieval Tool (IRS DRT) cannot know if the word "Rollover" was included on the tax return. Therefore, it assumes that the total difference between the distribution reported on line 15a or 16a, and the taxable portion on line 15b or 16b is untaxed income for Expected Family Contribution (EFC) purposes, and that amount is transferred from the IRS DRT into the FAFSA as untaxed income for IRA distributions or pension distributions.</p>

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			For additional guidance on this topic, please see the Program Integrity Questions and Answers, VI-Q4 and VI-A4 here .
2	<p>1. Is it possible to remove skip logic that skips the federal assistance questions on the FAFSA. This is particularly an issue for schools working with students in a low income area, where federal assistance may be higher. In many cases we find that when we bring the family in for questions on how the family is living on low income, and discuss other untaxed income we find that more often than not the family is receiving SNAP, or other federal benefits.</p> <p>2. In regard to the 'Did you, {}, file a Form 1040X amended tax return?' it will be helpful to users if there is clarification on what a 1040X is. I see that the tips box offers the assistance with the question but you have to be clicked on the answer to the question to get the information to the tip box. My suggestion would be to make the 1040X a hyperlink, or a mouse over, that pops up a bubble that specifically says 'The Form 1040X is used to correct your original filed tax return.' I would suggest this in addition to the information in the tips box.</p>	Anonymous	<p>1. No Change. The Department of Education uses skip logic in combination with other functionality in <i>FAFSA on the Web</i> (FOTW®) to present applicants with the appropriate questions needed to complete the form. If an applicant has already been determined to be eligible for the simplified needs test based on questions previously displayed in FOTW, the Means-Tested Benefit questions are not necessary to calculate an Expected Family Contribution (EFC), so they are not displayed.</p> <p>2. Text associated with the <i>FAFSA on the Web</i> (FOTW) questions referenced has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p>
3.	We have grave concerns that no longer providing the list of school in the order the student listed them to state grant agencies will have significant unintended consequences in terms of costs and increased burden to and confusion among the students served by our state grant programs, particularly in terms of complicating the financial aid application process and delays in grant processing. We believe that if the Department understands the facts regarding this proposed change's impact on state grant aid programs and the unintended consequences of randomizing the student's FAFSA school	Brian Weingart, West Virginia Higher Education Policy Commission	The Department of Education recently posted an Electronic Announcement to the Information for Financial Aid Professionals Web site informing the community that the list of colleges will continue to display on the <i>Institutional Student Information Record</i> (ISIR) sent to state grant agencies in the order selected by the student for 2017-2018. Implementation of the change to provide the list of colleges in a different order has been delayed until release of the 2018-2019 <i>Free Application for Federal Student Aid</i> (FAFSA®).

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	<p>list order, it will delay or reverse implementation of the randomization process. As a result, we respectfully request reconsideration of this proposed policy change. Currently, we only use the FAFSA as our application for our state grant program. This change will require us to develop a second application that students will have to complete in order to receive state aid. You are creating a barrier to students instead of increasing access.</p>		
4.	<p>1. I am a scholarship coordinator for a community college. Part of my job is to work with students to complete their fafsa annually. The usernames and passwords and challenge questions are extremely overwhelming. PIN numbers were difficult enough, but the system now causes a large amount of time and stress on the applicant. When you have students that work fulltime and go to school part time, they do not have the time that it takes for them to complete this process. Having to remember EXACTLY how they put in the usernames and passwords from year to year is difficult. Most of my students are having to contact fafsa and resetting their passwords and usernames. Last week it took one student over one hour on the phone to reset her information. I understand the safety issues of stolen identification, but this system is causing a lot of undue stress on the student.</p> <p>2. Also, transferring the tax information is a huge problem. Usually with my 70 students, very rarely do they get the information to transfer over. It was much simpler going through the college and letting them request tax income on verifications. In an attempt to make the system more secure, it is taking a lot more time and effort for the student just to make application.</p>	<p>Quen Wilczek, Northern Oklahoma University</p>	<p>1. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>2. Although use of the IRS Data Retrieval Tool (IRS DRT) is strongly encouraged, it is not required. Students and parents who choose not to use the IRS DRT may instead obtain their Tax Return Transcript(s) from the IRS and submit those to the school if required.</p>
5.	<p>1. I believe that we should ask about child support received and paid in 2016, not 2015 because for many the</p>	<p>Anonymous</p>	<p>1. No Change. All <i>Free Application for Federal Student Aid</i> (FAFSA®) questions that pertain to income received or offsets to income are for the</p>

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	<p>amounts will differ due to the child turning 18 years old. If assets will go by the current amount, why not these elements?</p> <p>2. Also, for untaxed income and VA Non-educational benefits this should also go by 2016 and not 2015.</p> <p>3. Lastly, it is not correct that it does not matter which college is listed first because state agencies will only send the estimated grant information to the 1st school listed, not to all schools. Therefore there should be a disclaimer that advises them to contact their State Agency to update the school they will be attending if that school wasn't listed 1st. This a problem since we can't send out correct award offers since we don't have the estimated grant info if we aren't the 1st school listed.</p>		<p>same year. On the 2017-2018 FAFSA this is 2015.</p> <p>2. Refer to comment #5.1 for resolution.</p> <p>3. Refer to comment #3 for resolution.</p>
6.	Please increase the number of colleges a student can list on the FAFSA to 20. Most students today submit at least 15 applications.	Anonymous	Refer to comment #1.1 for resolution.
7.	Is there any possibility of moving the Financial Aid Office Codes on the SAR to the end of the document and to provide better definitions of Grants, Loans (by program), and other Federal programs before the numerical award information? I think this print will be much more meaningful to students than notifications required by the Paperwork Reduction Act. Also, I loved The Simpsons references in the model SAR - keep those!	Joseph Freeman, Randolph School	<p>No Change. Shifting the legal disclosures and the “Only For Use By Financial Aid Office” data from page 2 to the end of the paper <i>Student Aid Report</i> (SAR) would place the disclosures on the same page with any signatures needed for correction. In the event a correction is made to the paper SAR, the disclosure would also be submitted. The Department of Education believes students should retain the disclosure with their records.</p> <p>Definitions of grants and loans that the student has already received can be found in many other places that are more appropriate for this information, such as StudentAid.gov, StudentLoans.gov and institutional information.</p>
8.	1. Put in stop edits that a person cannot continue unless they answer a question, or that it can't be submitted until all questions are answered. No more leaving questions "Blank"! We're having an issue with people NOT marking	Mary Gerardy, North Dakota State University	1. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support a change to require a response to Question #21.

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	<p>their gender, # 21.</p> <p>2. Before filling out the student section, maybe put a bold statement "Parents DO NOT fill out this section."</p> <p>3. Lengthen last name for those with hyphenated names.</p> <p>4. (21.) Can this say gender at birth? With trans genders, if they were born male they still have to register for selective service?</p> <p>5. (22). Can this be reworded to say "If female at birth, skip to question 23. If male at birth, answer this question?"</p> <p>6. (24 & 25.) Prior to this question, there should be</p>		<p>2. No Change. The 2017-2018 paper <i>Free Application for Federal Student Aid</i> (FAFSA®) has instructions on page 1 that state: "Green is for student information and purple is for parent information." and each individual step lists, in parentheses, "Parent" or "Student", depending on who should answer the questions.</p> <p>Additionally, parent and student information can be distinguished by color in <i>FAFSA on the Web</i> (FOTW®). Parent information in FOTW is always distinguished with purple color in the left margin (with the word "Parent"), and the student information is always distinguished with blue color in the left margin (with the word "Student").</p> <p>Finally, the title bar at the top of each page in FOTW identifies whether the questions on the page are for the student or for the parent.</p> <p>3. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>4. No change. The notes for Questions 21 & 22 on the FAFSA currently state:</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."</p> <p>5. Refer to comment #8.4 for resolution.</p> <p>6. No Change. These questions and responses have been carefully selected</p>

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	<p>clarification of the parent they should be using. So many just think biological parent(s).</p> <p>7. (35.) If they answer #33 as IRS 1040A or EZ, have this automatically fill in yes.</p> <p>8. (36 - 38.) Explain if they are married and they filed separate returns in 2015, they need to add this information together.</p> <p>9. (41 - 43.) Don't let them bypass this information. It would be helpful if schools could see the threshold amount.</p>		<p>in consultation with the states since use of the responses varies by state.</p> <p>7. No Change. If an independent applicant filed a 1040A or a 1040EZ and meets the income threshold, FAFSA Question #33 does not display because the response is not needed; the student has already been determined to meet the Simplified Needs Test (SNT). If an independent applicant filed a 1040A or a 1040EZ and does not meet the income threshold, Question #33 does not display because the student cannot qualify for SNT and therefore, a response to Question #33 is not needed to determine eligibility for aid.</p> <p>8. No Change. The “Notes” on page 1 of the paper FAFSA state: “Note: Both parents or both the student and spouse may need to report income information on the FAFSA if they did not file a joint tax return for 2015. For assistance with answering the income information questions in this situation, call 1-800-4-FED-AID (1-800-433-3243).”</p> <p>FOTW also has help text to assist students with answering these questions correctly.</p> <p>9. No Change. Students who qualify for the Simplified Needs Test (SNT) can choose to skip the asset questions because the simplified EFC Formula does not include asset information in the calculation. Additionally, students who do not qualify for SNT can skip the asset questions if their assets total an amount less than the Asset Protection Allowance (APA) that is calculated based on their age and marital status. This is because assets totaling less than the APA are not included in the Expected Family Contribution (EFC) calculation.</p> <p>The threshold amount is the same as the APA, which is included in the ISIR, and therefore available to schools. Additional information on the Asset Threshold and the APA fields can be found in the ISIR Guide.</p> <p>Information about the APA and the EFC calculation can be found in the EFC</p>

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	<p>10. (49 & 50.) Can you state "who was federally activated" instead of, or in addition to "for other than state or training purposes?"</p> <p>11. (51 & 52.) Can you emphasize who will receive more than half their support from you?</p> <p>12. (53.) Can you emphasize that they need to have death certificates or court documentation showing these statuses?</p> <p>13. (54 & 55.) Can you emphasize that they need to have court documentation showing these statuses?</p> <p>14. (56 - 58.) Can you state that self - supporting does not mean once you turned 18 your parents said you are responsible for your own expenses?</p> <p>15. No more leaving questions "Blank"! #'s 16, 19, 22, 23, 31, 32, 33, 34, 35, Asset Threshold Exceeded & 102.</p>		<p>Formula Guide.</p> <p>The 2017-2018 Justification of Data Elements contains explanations on the asset fields and how the APA is determined.</p> <p>Finally, conference presentation #39 ("Demonstrating Expected Family Contribution (EFC) Hand-Calculations") from the 2014 Federal Student Aid Fall Training Conference is a great introduction on how the EFC is calculated.</p> <p>10. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>11. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>12. No Change. The notes for Question #53 indicate that "The financial aid administrator at your school may require you to provide proof that you were in foster care or a dependent or ward of the court." We do not specify individual documents because schools are not required to obtain documentation, and for those that do, the documentation requested may vary.</p> <p>13. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>14. No Change. The Department of Education needs to further assess this recommendation to see if it might be considered as a future change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>15. No Change. If the student submits a paper FAFSA, it is rejected if Questions 16; 19; 23; 32; 33 or 34 are blank. When using <i>FAFSA on the Web (FOTW)</i>, the student is unable to proceed if these questions are left</p>

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	<p>16. Parent Section 62 & 66. Lengthen last name for those with hyphenated names.</p> <p>17. (73.) State "Don't include other biological or step-parent if they have divorced and they no longer live in the same home".</p> <p>18. (83.) If they answer #81 as IRS 1040A or EZ, have this automatically fill in yes.</p>		<p>blank.</p> <p>Question # 22 asks male students if they would like the Department of Education to register them with The Selective Service System. This question does not apply to all applicants, and a response is not required.</p> <p>Question # 31 is not required to be answered to determine eligibility for federal student aid.</p> <p>Questions #35 and #102 dynamically display on FOTW only when the student is independent. If independent, the student must answer #102 to proceed. A response to Question #35 is only required if the independent student meets the income threshold for the Simplified Needs Test (SNT) but hasn't yet been determined to be eligible for SNT based on responses to other questions.</p> <p>Finally, the "Asset Threshold Exceeded" question is only applicable in very specific instances, and only in FOTW. When the question displays, a response is required in order to proceed.</p> <p>16. Refer to comment #8.3 for resolution.</p> <p>17. No Change. The Department of Education believes the current question and instructions provide adequate guidance.</p> <p>18. No Change. If a parent filed a 1040A or a 1040EZ and meets the income threshold, FAFSA Question #83 does not display because the response is not needed; the student has already been determined to meet the Simplified Needs Test (SNT). If a parent filed a 1040A or a 1040EZ and does not meet the income threshold, Question #83 does not display because the student cannot qualify for SNT and therefore, a response to Question #83 is not needed to determine eligibility for aid.</p>

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	<p>19. (85 - 87.) Explain if they are married and they filed separate returns in 2015, they need to add this information together.</p> <p>20. (90-92.) Don't let them bypass this information. It would be helpful if schools could see the threshold amount. Do NOT give the option to skip the remaining questions for both you and your parent(s) assets. Student's information should always be required and not skipped.</p> <p>21. No more leaving questions "Blank! #'s 59, Parent's Grade Levels, 80, 81, 82, 83, 84, & Asset Threshold Exceeded.</p>		<p>19. Refer to comment #8.8 for resolution.</p> <p>20. No Change. When a dependent student qualifies for the Simplified Needs Test (SNT), neither the parent nor the student assets are included in the EFC calculation. Therefore, a response to the asset questions is not required.</p> <p>21. No Change. When a dependent student submits a paper FAFSA, it is rejected if Questions 59 or 80 are blank, and when a dependent student whose parents filed a tax return submits a paper FAFSA, it is rejected if Questions 81 or 82 are blank. When using <i>FAFSA on the Web</i> (FOTW), the student is unable to proceed if these questions are left blank when displayed.</p> <p>Questions 24 & 25 are not required to be answered to determine eligibility for federal student aid.</p> <p>Questions #83 and #84 dynamically display on FOTW when the student is dependent. If dependent, the student must answer Question #84 to proceed. A response to Question #83 is only required if the dependent student's parents meet the income threshold for the Simplified Needs Test (SNT) but haven't yet been determined to be eligible for SNT based on responses to other questions.</p> <p>Finally, the "Asset Threshold Exceeded" question is only applicable in very specific instances, and only in FOTW. When the question displays, a response is required in order to proceed.</p>
9.	Is there a reason why you are still allowing students and parents to indicate "will file" on their tax return status? It seems that the spirit behind moving to prior-prior year	Anonymous	No Change. There are reasons an applicant may select "Will file". Among them are that certain applicants (military service members deployed to combat zones or those hospitalized for injury from service in a combat

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	<p>information, of 100% accuracy regarding FAFSA information, is lost on this. I understand that there is still a population of families that may have filed a tax extension for the prior-prior year that have 15 additional days to have their taxes submitted to the IRS. My suggestion would be to no longer allow estimated income information on the FAFSA, as the move to prior-prior year is implemented. This would be an additional way to ensure that schools do not have to face the issue of conflicting information.</p>		<p>zone, for instance) may have a longer filing extension than non-military applicants.</p> <p>The IRS has the authority to grant an additional extension beyond the six months approved as a result of IRS Form 4868.</p> <p>Additionally, some foreign countries have later tax filing deadlines than the U.S.</p>
10	<p>1. In the "Filling out the FAFSA" box on the front of the paper FAFSA - please consider changing "complete this form to the extent you can" to "provide the information requested and contact your school's financial aid office about their appeal process".</p> <p>2. On page 2 under "How much student financial aid will I receive" - change the last sentence from "large change in income from last year to this year" to "large change in income from 2015 to this year" - remember we are no longer using LAST year's income info.</p> <p>3. Prior to 2014-15, question 24 & 25 said your father and mother and was subsequently changed to parent 1 and parent 2 - I thought the reason for this question was to identify first generation college students based on their natural parents...is it truly doing that now as parent 1 and/or two might be a step-parent and not a natural parent? and is first generation still based on your natural parents?</p>	Melissa Ibanez, University of Pittsburgh	<p>1. No Change. The Department of Education has received feedback from the financial aid community that the preferred process for students is to first complete the <i>Free Application for Federal Student Aid</i> (FAFSA®) and then contact the school, as many schools will not consider an appeal until the FAFSA has been submitted.</p> <p>2. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p> <p>3. Refer to comment #8.6 for resolution.</p>
11.	<p>1. In Step 6, you changed the wording in the paragraph by just saying: "It does not matter in what order you list your selected schools." This is not entirely accurate. Our state</p>	Susan Johnson	<p>1. Refer to comment #3 for resolution.</p>

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	<p>grant agency will only process a certain number of schools, so we would prefer that the student put their top choices first. Since we don't see the schools anymore, we won't know where we are and if it might cause an issue with the student's state grant. I would recommend using the same wording as the 2016-2017 FAFSA: "For federal student aid purposes, it does not matter in what order you list your selected schools. However, the order in which you list schools may affect your eligibility for state aid. Check with your state grant agency for more information."</p> <p>2. We have a handful of students who say "Yes" they have a first bachelor's degree (question 28) and also indicate the degree they are seeking is their first bachelor's degree (question 30). Is there a way to create logic so the student understands the discrepancy? The students who make this error tend to be high school students answering as if the question were asking about a high school diploma.</p>		<p>2. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p>
12	<p>Vermont Student Assistance Corporation (VSAC) has serious concerns based on the new language in Step Six instructions on the FAFSA that seems to imply that state grant agencies will not receive the list of schools in the order that students listed them. We believe this will have unintended consequences in term of costs and increased burden and confusion for the students served by our state grant programs. Rather than simplifying the process this will result in a delay in processing, the need to collect additional information from students, and over complicate the financial aid process. Please reconsider this proposed change and continue to provide states with the entire list of schools in the order that the student reported them.</p>	Marilyn Cargill, VSAC	<p>Refer to comment #3 for resolution.</p>
13	<p>We are very concerned about the language in Step 6 which indicates that state agencies will not be able to view</p>	Mark French, CTOHE	<p>Refer to comment #3 for resolution.</p>

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	<p>the list of schools a student puts on the FAFSA. Not being able to see the list at all, or only being shown a "scrambled" list will be extremely detrimental to the process we have had in place for the past 40 or so years. We have always depended on the exact school listing to accurately make awards to students interested in attending college in Connecticut. Any change to this will result in confusion and additional steps students and families will need to take to secure state aid. Over the past 8 or so years, the US Dept of Ed has focused on simplifying the financial aid process for students and partnering with states to achieve this goal. This planned change to not show state agencies the students list of schools is in direct conflict with the simplification goal. I can assure you, students and families will NOT understand why state agencies do not have access to the list of schools they put on their FAFSA. Please reconsider this change and allow states to receive the exact list of schools as listed by the student.</p>		
14	<p>Username and passwords are the way of the world now. When my students are creating their FSA ID I recommend they write it down and take a picture of it, they can even email it to themselves so they always have it.</p>	Anonymous	Thank you for the comment.
15	<p>Username and passwords are the way of the world now. When my students are creating their FSA ID I recommend they write it down and take a picture of it, they can even email it to themselves so they always have it.</p>	Anonymous	Thank you for the comment.
16	<p>Question 59 (marital status of your legal parents): the answer "divorced or separated" makes determining whether a parent has filed their taxes correct difficult based on how a state recognizes marital status. Texas does not recognize a couple as legally separated. Therefore, a couple must file as married joint, married</p>	Anonymous	<p>No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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	<p>separate, or head of house, until a divorce decree has been signed. So, if the FAFSA is marked "divorced or separated" and taxes are filed as "single," a tax mistake is unclear--divorced/single is fine, but separated/single is not. Because the two marital indications are not exclusive of each other on the FAFSA, making the determination is almost impossible without putting up barriers for the student. It is my hope that the FAFSA separate the two marital indications. Or move the divorced choice to "divorced or widowed" and leave the "separated" as its own answer; much like it appears in the student's marital status question sixteen.</p>		
17	<p>This is a very important op-ed to read about the experiences of the very poorest students because the FAFSA is "simplified". Instead of putting them through the hoops of verification, ask the questions about the value of their means tested benefits when they have the help getting the answers. http://www.bostonglobe.com/opinion/2016/03/24/let-make-easier-for-low-income-students-apply-for-financial-aid/N743AQmyW6JiXdDipHWfVO/story.html?s_campaign=email_BG_TodaysHeadline&s_campaign=</p>	Ellen Frishberg	Thank you for the comment.
18	<p>I believe the high school completion question should have the answer for GED/state certificate broken out. These answers no longer serve the same purpose for answering a student's Ability to Benefit. This is evidenced by the fact that EDEXpress software stopped carrying over the ISIR response to the demographic's section of a student record when the 2015-2016 software was released.</p>	Zach Greenlee	<p>No change. The EDEXpress logic for Ability to Benefit (ATB) is centered on the High School or Equivalent field on the <i>Institutional Student Information Record</i> (ISIR). EDEXpress imports the Student Eligibility Code field on the Demographic Data (Demo) tab as "07" (General Education Development [GED] certificate or state certificate) when the HS Diploma or Equivalent value on the ISIR is 2 (GED/State Equivalent Test). Briefly, during the 2015-16 Award Year, EDEXpress began recording separate values for GED certification and state certification, and to account for this, EDEXpress began importing values of "2" (GED/State Equivalent Test) as "blank" on the Student Eligibility Code field on the Demo tab, because the ISIR still had this as a combined value and the Common</p>

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			<p>Origination and Disbursement (COD) system had these two as separate values.</p> <p>However, for 2016-2017, COD and EDEXpress reverted back to the old “combined” value. Currently, the 2016-2017 EDEXpress software imports an Institutional Student Information Record (ISIR) value of “2” on the GED/State Equivalent Test field as “07” once again on the Student Eligibility Code.</p>
19	<p>We have great concern over the language change in step six. Specifically, the statement that alludes to state agencies not receiving the school listing beginning with the 2017-18 FAFSA. Our state grant process allows any eligible North Dakota resident who lists an eligible North Dakota institution on their FAFSA (in any order) to be considered for an award of need-based aid. This process is automated for students without the need of a separate application. It is seamless for students and provides valuable funding to the neediest students. Without our agency receiving the school information that the student has listed on their FAFSA, we will need to create a separate application process. This will not only create a delay in the award process, but undue confusion to those who are in greatest need. Please review this statement for revision to allow state agencies to continue receiving all school information.</p>	<p>Brenda Zastoupil, North Dakota University System</p>	<p>Refer to comment #3 for resolution.</p>
20	<p>This is a comment for the FOTW in comparison with the pdf version. As a veteran of about 20 high school FAFSA nights, I see frequent errors in the parental asset section, especially for the business value question. Although the information bar explains adequately (toward the bottom), people believe they know how to answer the question without looking at that help area. Therefore they put in the asset value of their small businesses. I see this repeatedly. A farm, for example, may be worth \$2 million,</p>	<p>Nola Lynch</p>	<p>Text associated with <i>FAFSA on the Web</i> (FOTW®) Questions 43 & 92 has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p>

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	<p>but the parents don't have to list it when they have few employees. It would be simple to extend the wording to parallel that of question 92 on the pdf. That would mean so much difference in eligibility for some of these families! I'm attaching a word file with screenshot and pdf clipping.</p>		
21.	<p>1. Recommendation 1: Allowing utilization of Income Tax Return copies for income verification if taxes are prepared and filed by a tax preparer.</p> <p>2. Recommendation 2: Allowing students 18 and over to file as head of household/independent students status when they have been abandoned by parents without a legal change in guardianship. Have met with students whose parents moved and they were left with a relative or family friend to complete their high school diploma, but have no permanent home once they graduate.</p> <p>3. Recommendation 3: Asking if either parent has been awarded a Bachelor's (4 year) degree instead of asking if their parents attended college. There are a significant number of people who have attended college, but have never completed a degree.</p> <p>4. Recommendation 4: Improve the clarity of wording on FAFSA questions to indicate which sections ask for student data (income) versus parent data.</p>	Terri Philpott, Concord University	<p>1. No Change. The Department of Education has referred this suggestion to the appropriate business unit to review the recommendation.</p> <p>2. No change. Head of Household is an IRS tax filing status and not managed by the Department of Education.</p> <p>In the instance of a student who has been abandoned by the parent or guardian, the student should answer "Yes" to FAFSA® Question 56, 57 or 58 if he/she has a determination of homelessness from one of the specified entities. If he/she does not have a determination of homelessness, he/she should indicate in <i>FAFSA on the Web</i> (FOTW®) that he/she is homeless or at risk of homelessness and follow the path that allows for submission of the FAFSA without reporting parental information. This allows the Financial Aid Administrator (FAA) to make a homeless youth determination, if warranted, which allows the student to be considered independent for federal student aid purposes.</p> <p>3. Refer to comment #8.6 for resolution.</p> <p>4. Refer to comment #8.2 for resolution.</p>

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22.	<p>Verification Idea: Develop a Verification tab on FAFSA.GOV that would allow the student (and parent for depend student) to complete the verification worksheet and sign electronically with the FSA ID. Develop this verification worksheet with the ability to transfer IRS data and if the data transfer is not successful---prompt the student and/or parent to request an electronic IRS tax transcript.</p>	<p>MerylIn Kathol, Western Iowa Tech Community College</p>	<p>No Change. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process. The verification selection process is separate from the application process and takes place after the <i>Free Application for Federal Student Aid</i> (FAFSA®) has been submitted.</p>
23.	<p>1. In the past, the Central Processing System has added and issued SAR Comment Codes related to 'Cross Year' comparison of information reported on an applicant's FAFSA (such as SAR Comment Code 032). The comment code reflects a specific comparison of a current year FAFSA field when information is significantly different than the same FAFSA field on the applicant's last year FAFSA. While considering certain taxed and untaxed items should not be significantly different when comparing 2016-2017 and 2017-2018 FAFSA data, a similar SAR Comment Code and/or Reject Code should be provided to assist financial aid administrators with resolving conflicting taxed and untaxed data information.</p> <p>In addition, please allow institutions to establish a policy that will allow the institutions to process the SAR Comment Codes or Reject Comment Codes using reasonable judgment and/or documentation in accordance with 34 CFR 668.54(a)(2).</p> <p>2. In hopes of timely awarding, the general purpose of implementing the Early FAFSA process is to allow students to complete their FAFSA using data from already completed tax returns which will result in applicants completing the FAFSA timely. In addition, this may also allow low-income students to overcome barriers of gathering proper tax data as they will be granted the</p>	<p>Anonymous</p>	<p>1. The 2017-2018 <i>Free Application for Federal Student Aid</i> (FAFSA®) will include edits that compare certain financial data to the data that was reported on the 2016-2017 FAFSA (if the student has a FAFSA for both years). Watch the Information for Financial Aid Professionals (IFAP) Web site for specific guidance as it becomes available.</p> <p>2. 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> (FOTW®) 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>

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	<p>opportunity to electronically transfer their income tax return information via IRS DRT into the FAFSA. Therefore, we are requesting an additional clause to be added for resolving conflicting information and collecting untaxed income data or other data elements that are not evaluated for students who are eligible for the Auto-Zero EFC Pell Formula. Collecting additional documentation may only result in the applicant remaining with a Zero EFC while subsequently delaying the applicants' awards.</p>		
24.	<p>The Iowa College Student Aid Commission (Commission) is the state agency in Iowa that administers state-funded scholarship and grant programs. The possibility of states not receiving the student-selected colleges on the FAFSA is extremely concerning. The third sentence of Step Six of the draft 2017-18 FAFSA states, "All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list as well as your state student grant agency." It is uncertain whether this was an intentional sentence meant to alert states that they would no longer have access to the list of student-selected colleges from the FAFSA; I am seeking clarification on that point.</p> <p>The Commission relies on a complete list of student-selected colleges to distribute award notices to students/colleges. If the US Department of Education does not provide states access to the complete list of college choices it would disrupt Iowa's ability to administer its state grant programs. Ultimately, it would require every applicant to complete an additional application (negatively impacting the student by creating another application requirement for the majority of Iowa grant programs). This could impact over 26,000 student awards through the distribution of \$70 million in state grants.</p>	Todd Brown	<p>Refer to comment #3 for resolution.</p>

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	<p>Given that the 2017-18 FAFSA will be released in less than 6 months, a disruption in awarding and service to students would be inevitable. Staff at the Commission is hopeful that the aforementioned sentence on the draft 2017-18 FAFSA was written incorrectly, and that states will continue to receive the student-selected list of colleges. While randomization of the colleges a student lists on the FAFSA doesn't directly impact state grant awarding in Iowa, not receiving the list of student-selected colleges would have drastic impact on Iowa students.</p>		
25.	<p>The Connecticut Office of Higher Education (CTOHE) is the state agency which is responsible for the administration of state-funded financial aid in Connecticut. We have long depended on the exact student listing of colleges from the FAFSA to determine eligibility for granting scholarship awards to our residents. As such, we are very concerned about the U.S. Department of Education's plans to scramble or even do away with the list when the FAFSA data is transmitted to the various state agencies. The draft of the 2017-18 FAFSA states, in Step Six "All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list as well as your state student grant agency." Not supplying CTOHE with the list at all, or even only providing a scrambled list will result in additional confusion to students and families. They will assume our agency will have received the list (we know folks who fill out the FAFSA are notoriously careless when it comes to reading instructions). We will be forced to create a process whereby we have to ask students via a state process what colleges, and the order they listed them on the FAFSA.</p>	Mark French	<p>Refer to comment #3 for resolution.</p>

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	<p>Any changes to how we are setup to administer our scholarships will require a substantial outlay of funds and man hours, both of which are in very, very short supply in our state. The U.S.Department of Education has consistently referred to the partnership between states and themselves as critical to making the financial aid process simpler for students and families. Therefore, we are perplexed as to why this partnership is being ignored and states are being forced to accommodate a new process which will make applying for aid more complex, confusing and costly for students, families and states. The U.S. Department of Education has never given a reason they no longer want to give states access to the students exact list of colleges on the FAFSA. They have made unsubstantiated comments about states holding aid back based on the use of the list, but have never provided any examples of proof. I can not speak for other states, but I assure the U.S. Department of Education that CT has never held back any state aid and awards all appropriated aid each year to our neediest and most deserving students. I ask that states continue to be given the FAFSA college listing exactly as students put it on their FAFSA. This will allow states to continue to provide state aid in a timely, convenient and well established manner.</p>		
26.	<p>The U.S. Department of Education's plans for removing college codes from 2017-2018 ISIR records received by state agencies will have a very negative impact on state financial aid operations. A little background: The U.S. Department of Education discovered that some colleges were using the ranking of colleges on the FAFSA as an indicator of the student's likelihood of attending the college and taking that into consideration when making</p>	Ginny Dodds	<p>Refer to comment #3 for resolution.</p>

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	<p>admissions and financial aid decisions. In other words, a low-ranked college might decide not to admit the student or offer the student less institutional financial aid. The Department's response to this problem was to generate 2016-2017 FAFSA output to colleges that did not display the other college codes listed by the student. State agencies continued to receive 2016-2017 FAFSA output with all colleges listed by the student. The Department then informed state agencies that, beginning with the 2017-2018 FAFSA cycle, they would continue to receive FAFSA output with all the colleges listed by the student, but in random order. Many state agencies that award state financial aid on a centralized basis will be negatively impacted by this, as they typically have awarded students based on the first college choice on the FAFSA. The random college code order is not an issue for the MN Office of Higher Education, as our state grant program is administered on campus. The Department subsequently released a draft of the 2017-2018 paper FAFSA with language informing the applicant that state agencies would not receive any college codes listed by the student. There was no notice provided by the Department to the states prior to seeing this language. Needless to say, state agencies are rather shocked by the Department's decision, considering that state agencies never used the college code ranking on the FAFSA output in a manner that would harm students. State agencies awarding state financial aid on a centralized basis will now need to contact every student to determine which college the student will be attending. This will either involve manual entry of the student's college choice into the awarding system or the development of a web-based questionnaire to capture this information from students. The National Association of State Student and Grant-in-Aid Programs (NASSGAP) is</p>		

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	<p>now querying members to gather information that will be used to lobby the U.S.Department of Education to reverse its plans. Even though MN state financial aid is awarded on a decentralized basis on campus, this will still create serious problems for our State Grant operations. There are three program eligibility requirements for MN State Grant that are not used for federal financial aid programs: default on a state student loan, child support arrears and previous receipt of a State Grant. When our agency receives a student's FAFSA output, we inform all colleges listed on the FAFSA of any state eligibility problems via a web-based eligibility report. This system prevents schools from awarding applicants who don't meet the program eligibility requirements. Without college codes on the FAFSA output, we will be unable to continue this necessary function.</p> <p>(Due to data privacy requirements, we cannot let colleges access student data without being listed on the FAFSA.) The result will be colleges awarding ineligible students and then backing off State Grant awards later in the school year when schools report their awarding activity to the agency. Our agency also makes use of a state interface with FAFSA on the Web. When a MN resident completes the online FAFSA, s/he is directed to our secure state web site to complete a short questionnaire about history of state residency and postsecondary attendance. This information is then loaded to our questionnaire database and used by the colleges listed on the student's FAFSA. We will not be able to operate this system without college codes on FAFSA output, which means schools will need to revert to using a paper questionnaire or build their own online questionnaire for students to use. In summary, the</p>		

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	planned changes to the 2017-2018 FAFSA will have a very negative impact on students, creating confusion and delays. Thank you for your consideration.		
27.	<p>The below comments relate to FAFSAs submitted electronically by students:</p> <ol style="list-style-type: none"> 1. When a student completes the FAFSA and lists U.S. Income Tax Paid as greater than or equal to Adjusted Gross Income, the FAFSA will be rejected during processing. This requires the student to go back and make a correction to the FAFSA. This type of error should be prevented so that a student cannot move forward in completing the FAFSA without correcting this error first. The same problem happens with parent financial information. 2. A student who is independent by age indicates that they have children they support and that they are also supporting someone other than a spouse/child, then indicates a household size of 2. This is conflicting information that the FAFSA does not prevent or flag for the school. 3. When a parent provides an answer for Education Credits that is impossible (such as \$150,000), the FAFSA should prevent the parent from moving forward until they correct it, rather than putting the family in the position of having to correct it later. 4. A FAFSA that is submitted with parent financial information identical to student financial information (including the amount paid for child support and earned in Workstudy) is clearly incorrect. The FAFSA does not 	Becky Pribyl Northern State University	<ol style="list-style-type: none"> 1. No Change. <i>FAFSA on the Web</i> (FOTW®) currently has edits that instruct the student and parent to either correct the information when the taxes paid is equal to or greater than their adjusted gross income (AGI), or to confirm that the data is correct. In the event that the applicant, or their parent, chooses to confirm this information, they are informed that their application will be rejected. 2. No Change. <i>FAFSA on the Web</i> (FOTW) currently has an edit that instructs the applicant to review and correct this information. If the applicant does not correct this information, the application is rejected. 3. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®). 4. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for</i>

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	<p>prevent or flag this either.</p> <p>5. Many students report "Taxable college grant and scholarship aid reported to the IRS in your adjusted gross income..." and then also report that they will not file a tax return. This is conflicting information that the FAFSA does not prevent or flag.</p> <p>All of the above are items that the student/school need to find and fix because they could have an impact on the student's award package. They are also preventable issues that the electronic FAFSA should eliminate.</p>		<p><i>Federal Student Aid (FAFSA®).</i></p> <p>5. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®).</i></p>
28.	<p>As one of the U.S. Department of Education's primary partners in the effort to increase access to and the affordability of higher education, the National Association of State Student Grant and Aid Programs (NASSGAP) is alarmed that the Department continues to propose changes to the FAFSA process that will complicate, rather than simplify, the aid application process for students seeking to obtain federal and state student grant aid to pursue their college dreams. NASSGAP was initially notified in October 2015 of the Department's intent to no longer share a student's FAFSA school list in the student's order but rather to provide states with a randomized list. On November 6, 2015, NASSGAP responded with a letter to Under Secretary Mitchell documenting that the student's list order is needed by 15 states providing about \$2.5 billion in annual state grant aid to students. As the Department knows from NASSGAP's communications, states use the institution information to verify the student has interest in attending an eligible institution, and in some cases to determine initial allocations to institutions. The Department responded in January 2016 by noting that</p>	NASSGAP	<p>Refer to comment #3 for resolution.</p>

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	<p>it was "...very concerned that applicants do not understand the implications that their designations of such institutions have on their eligibility for state student financial aid. And we are especially concerned that applicants do not understand that the order in which they so designate institutions can impact their eligibility for, and notification of, state aid." NASSGAP responded on February 12, 2016 (attached to this comment submission), noting that we are not aware of an instance where a student was denied a state student grant solely because of the institution listed first on their FAFSA. We have repeatedly asked the Department to provide examples of any such students; however, we have not been provided with any examples or evidence that this is a significant problem that merits the disruption of the current student aid process for hundreds of thousands of students. We believed our February 12th letter represented a strong case for reversing the Department's proposal to randomize the order of the student's FAFSA school list before providing it to state grant agencies. So NASSGAP and its members were stunned to see that the 2016-02-01 draft FAFSA released March 29, has instructions in Step Six stating that the Department will not share the student's school list (in any order) with state agencies, and further suggesting to students that the order in which they list schools does not matter - a significant change from the prior guidance. Last week, in response to grave concerns raised by the states, Department staff have indicated that, despite the proposed instructions in Step Six of the FAFSA, the school list will continue to be shared with the states. This information is not reassuring, since that is not what the proposed FAFSA language says. In fact, we are more confused than ever by the idea that students will be told their list of schools will not be shared with the states, if</p>		

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	<p>that is not the case. The bottom line is that Department's proposed change to discontinue sharing the student's FAFSA school list, in the order provided by the students, with state student grant agencies will needlessly complicate the financial aid application process, decrease student awareness of state grant eligibility, and force state grant agencies to expend scarce dollars on system changes that could otherwise have been devoted to state student grant aid. Last, in response to the Department's request that commenters provide preferred language, as well as indicating their concerns, please consider: Enter the six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-500-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. 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 2. Please note that the verbiage above assumes that the Department's proposal to randomize the list of schools provided to the states will not be implemented, based on the information NASSGAP has provided documenting the extensive and detrimental impact to students and states. Thank you.</p>		
29.	<p>1. Q. 1/2/3 The instructions for these questions state "Your full name (exactly as it appears on your Social Security card)." However, the Social Security card lists the individual's legal name in the order FIRST MIDDLE LAST, while the FAFSA requests the information in the order LAST FIRST MIDDLE. Change the order to FIRST MIDDLE</p>	Mark Kantrowitz	<p>1. No Change. The Department of Education does not believe the current instructions cause confusion for applicants.</p>

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	<p>LAST to match the order on the Social Security card.</p> <p>2. Q. 8 Given the reference to the applicant's Social Security card in questions 1-3, it might be worthwhile to move question #8 immediately after questions 1-3 (and move questions #9 and #10 too, for spacing reasons). That way, all of the questions that refer to the Social Security card are adjacent. This might reduce the number of errors in the question about the applicant's Social Security Number.</p> <p>3. Q. 21 Some transgender students will answer this question without reading the notes on page 9. Rewording this question as "Were you male or female at birth?" or "Were you born male or female?" or something similar may reduce the error rate for transgender students.</p> <p>4. Q. 24/25 Since this question is the only one that refers to the student's legal parents, which are not necessarily the same as the student's current parents, perhaps the words "biological/adoptive" should be inserted before "parents completed"?</p> <p>The questions before and after these questions all relate to the student. This is the only set of questions that concern the student's parents in Step One. Move questions #24 and #25 to the end of Step One, after question #31. This will allow questions #28 and #29 to move up to Page 3, where the juxtaposition with question #26 will be more effective.</p> <p>5. Q. 24/25 The wording of this question and the third choice "College or beyond" is confusing to families and may lead to the wrong answer being selected. The</p>		<p>2. No Change. The Department of Education does not believe the layout and order of the questions cause confusion for applicants.</p> <p>3. Refer to question #8.4 for resolution.</p> <p>4. Refer to comment #8.6 for resolution.</p> <p>5. Refer to comment #8.6 for resolution.</p>

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	<p>intention of this question is to identify students who may be “first generation college students” (i.e., first in their family to go to college). Definitions of first-generation vary. Some states count a student as first-generation if his/her parents did not receive a degree or certificate and some count a student as first-generation if his/her parents did not receive a Bachelor’s degree. To be inclusive of all possible definitions of first-generation requires the latter definition, so that a student will still be counted as first-generation if his/her parents received a certificate or Associate’s degree, but not a Bachelor’s degree. Either the number of options needs to be expanded to include Certificate and Associate’s degree as options, or the “College or beyond” option needs to be replaced with “Bachelor’s degree or beyond.” The question should have instructions to clarify that “College or beyond” includes Bachelor’s degree recipients but not Associate’s degree or Certificate recipients.</p> <p>6. Q. 28 Some students get confused and think that this question is asking about a high school diploma, due to the proximity with the question about high school. Inserting the words “from college” after “first bachelor’s degree” might reduce the error rate. Also, perhaps the answer choices should be reorganized so that “No” appears first.</p> <p>7. Q. 30 Applicants often get confused by this question and respond with their <i>ultimate</i> academic degree objective, instead of their <i>initial or current</i> degree objective. Try experimenting with alternate phrasings for this question, such as, “What degree or certificate will you be working on when you begin the 2017-2018 school year?” Perhaps, also insert the word “currently” after “will you”.</p>		<p>6. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>7. No Change. <i>Free Application for Federal Student Aid (FAFSA®)</i> Question #30 currently reads: “What degree or certificate will you be working on when you begin the 2017-2018 school year?”</p>

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	<p>Also, the current phrasing of the question involves rightward extraposition, which is a grammatical structure that is more difficult to comprehend, even for people at the reading level that is typical of applicants.</p> <p>8. Q. 31 Drop the question concerning the applicant's interest in work-study. Some students incorrectly believe that if they say they are not interested in work-study, they will get more grant aid.</p> <p>9. Q. 32/80 Given the switch from Prior Year (PY) to Prior-Prior Year (PPY), the "Will File" option is no longer needed except from October 1 to October 15. Automated extensions give taxpayers only 6 months after the April 15 filing date, which is October 15. Alternately, the FAFSA could retain the "will file" option but add a new edit check based on the current date if the applicant is filing the FAFSA on or after October 15.</p> <p>Also, the second sentence of the first paragraph under "Using Your Tax Return" on page 1 perhaps is no longer necessary?</p> <p>10. Q. 32/80. The "I'm not going to file" answer (option #3) for question #32 is not consistent with non-zero values in the answers to questions #44a, #44d, #45b, #45d, #45e and #45f. The "my parents are not going to file" answer (option #3) for question #80 is not consistent with non-zero values in the answers to questions #93a, #93d, #94b, #94d, #94e and #94f. This should trigger edit checks on the FAFSA on the Web.</p> <p>11. Q. #32-#33/ #80-#81. The addition of "IRS" to</p>		<p>8. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p> <p>9. Refer to comment #9 for resolution.</p> <p>10. In the event that an applicant or parent uses <i>FAFSA on the Web</i> (FOTW®) and selects "Not going to file", these questions do not display, so there is no chance for them to be answered erroneously.</p> <p>11. No Change. The Department of Education considers this suggestion a</p>

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	<p>questions #32 and #80 is an improvement. However, the references to tax returns are still somewhat ambiguous. It is not unusual for applicants to confuse them with state income tax returns. Perhaps add the word “federal” after the word “another”?</p> <p>Also, it is possible for a taxpayer to file both a U.S. federal income tax return and a foreign tax return, but this is not addressed by the notes on Page 9.</p> <p>12. Q. #33/35, #81/83, Add new edit check or skip logic, so that if the applicant selects option 2 “IRS 1040A or 1040EZ” on questions 33 and 81, it either skips the corresponding question #35 or 83, as appropriate, or prefills a “Yes” answer.</p> <p>13. Q. #34, Perhaps the answers should be listed in the same order as the federal income tax return, namely: Single, Married filing jointly, Married filing separately, Head of household, Qualifying widow(er). Also, use the exact same terminology as the IRS in referring to the filing status to minimize opportunities for confusion.</p> <p>14. Q. #36-38, #85-87, Add instructions “If you are married but file separate returns, add the figures for you and your spouse” as some applicants get confused and list only their income.</p> <p>15. Q. #42, #91, One of the most common FAFSA errors is including qualified retirement plan accounts in the answer to the question about investments. Inserting “and retirement plans” after “the home you live in” will help reduce errors.</p>		<p>stylistic preference.</p> <p>12. Refer to comment #8.7 for resolution.</p> <p>13. No Change. The order and language of the responses align with the order and language used on the page where students and parents authenticate with the IRS to use the IRS Data Retrieval Tool (IRS DRT). The order and language on that page were determined in consultation with the IRS. As a result of early findings when the IRS DRT was implemented, “Head of Household” was moved to display directly beneath “Single” since many applicants and parents selected the “Single” response incorrectly.</p> <p>14. Refer to comment #8.19 for response.</p> <p>15. No Change. The notes for these questions instruct applicants and parents to not include retirement plans, value of life insurance, or cash, savings and checking accounts already reported, in addition to the home that the applicant lives in.</p>

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	<p>16. Q. #42, #91, The definition of net worth is not entirely consistent with the statutory definition at 20 USC 1087vv(g). The statutory definition is: “The term “net assets” means the current market value at the time of application of the assets (as defined in subsection (f) of this section), minus the outstanding liabilities or indebtedness against the assets.”</p> <p>The definition in the notes on page 9 of the FAFSA is: “Net worth means the current value, as of today, of investments, businesses and/or investment farms, minus debts related to those same investments, businesses, and/or investment farms.”</p> <p>Note that the statute refers to “market value,” which is narrower than the FAFSA’s reference to “value”. Note that the statute refers to “outstanding liabilities or indebtedness against the assets” (i.e., debt secured by the assets), while the FAFSA refers merely to debts that are “related” to the assets.</p> <p>Consider, for example, if a family uses a home equity loan against their principal place of residence to buy a second home, such as investment real estate. The statutory definition does not permit the net worth of the second home to be reduced by the outstanding balance of the home equity loan, because it is secured by the principal place of residence and not by the second home. The FAFSA definition is ambiguous enough that they family might reduce the net worth of the second home by the amount of the home equity loan, since the home equity loan is “related” to the second home (i.e., it was used to</p>		<p>The help text in <i>FAFSA on the Web</i> (FOTW) provides sufficient information to clarify what investments should and should not be included.</p> <p>16. No change. 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), including this definition, is written using Plain Language.</p>

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	<p>purchase the second home).</p> <p>Correct the definition to read as follows: “Net worth of an asset means the current market value of the asset minus debt secured by the asset.”</p> <p>17. Notes for questions 42 and 43 (page 4), 45j (page 5), and 91 and 92 (page 7), After the reference to “retirement plans,” a fuller list of examples will help reduce confusion and improve accuracy. Instead of “(401(k) plans, pension funds, annuities, non-education IRAs, Keogh plans, etc.)” write “(401(k) plans, 403(b) plans, 457 plans, pension funds, annuities, non-education IRAs, SEP, SIMPLE and Keogh plans, etc.)”</p> <p>18. Q. 44a and #93a, Add an edit check to prevent applicants from providing a non-zero figure in the answer to this question if the student or parent AGI is above the income phase-outs for the American Opportunity Tax Credit or Lifetime Learning Tax Credit. Alternately, flag this question for verification.</p> <p>19. Q. #46. People have difficulty comparing dates. Rather than ask, “Were you born before January 1, 1994?” instead ask, “Were you born in 1993 or an earlier year?” This rephrasing of the question shifts the focus from the date to just the year of birth, a conceptually simpler question, but just as accurate. This will reduce confusion and errors.</p> <p>20. Q. #56-58, Combine these into a single question that reads as follows: “At any time on or after July 1, 2016, were you determined to be an unaccompanied youth who was homeless or self-supporting and at risk of being</p>		<p>17. No Change. The Department of Education believes the list includes the most common examples. The term “et cetera” at the end of the question indicates there are other possible items, but to list them all would be complicated and confusing, as well as risky, since an attempt to be all-inclusive might result in inadvertently omitting an item.</p> <p>18. No Change. Applicants and their parents are instructed to enter the amount listed on their IRS tax return.</p> <p>19. No Change. The student’s date of birth pre-fills in <i>FAFSA on the Web</i> (FOTW) based on the DOB entered as part of the FOTW login process. FAFSA Question #46 is pre-filled based on the DOB. Therefore, students are not asked to respond to this question in FOTW.</p> <p>20. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future change to the <i>Free Application for Federal</i></p>

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	<p>homeless by:</p> <ul style="list-style-type: none"> • your high school or school district homeless liaison, • by the director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development, or • by the director of a runaway or homeless youth basic center or transitional living program?" <p>This will significantly reduce the combined length of the three questions and make them less confusing.</p> <p>21. Q. Step Four #59-94 Many students have their parents complete Step four, in part because some parents do not share income and asset information with their children. The use of language “you (the student)” is confusing to some parents. Perhaps the use of pronouns (you, your, they, their) should be eliminated and replaced with “the student” and “the parents”? Use A/B testing with both versions to see which yields more accurate results and less confusion.</p> <p>22. Q. #74, #96, The instructions need to specify “at a college or university that is eligible for U.S. federal student aid”, as the college or university must be a Title IV institution per the Higher Education Act of 1965 [20 USC 1087nn(b)(3), 20 USC 1087oo(b)(3), 20 USC 1087pp(a)(2) and 20 USC 1087qq(a)(3). If the student’s sibling is enrolled in a foreign institution that does not have a federal school code (i.e., not eligible for Title IV federal student aid), the sibling cannot be counted in the Number in College figure.</p> <p>23. Q. 77, #99, Rephrase the answer to “Free or Reduced Price School Lunch.” People who work for Google, for example, receive a free lunch. While Google employees</p>		<p><i>Student Aid (FAFSA®).</i></p> <p>21. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>22. No Change. The Department of Education believes the addition of this text would create confusion since it is unlikely that applicants know if a sibling’s school is eligible for U.S. federal student aid.</p> <p>23. FAFSA Questions 77 & 99 have been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid.</i></p>

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	<p>are presumably intelligent enough to not get confused by this question, other people who work for companies that provide a free lunch, might be confused. Inserting the word "School," which is part of the official name of the federal program, will help eliminate confusion and reduce the error rate.</p> <p>24. Q. #103, Given that the U.S. Department of Education no longer prints the paper FAFSA, why can't the number of colleges listed on the print form be increased from 4 to 10? About a third of high school seniors apply to seven or more colleges, according to NACAC. Since the PDF version of the FAFSA is used mainly by low-income students, limiting them to 4 colleges puts them at a disadvantage. The number of colleges solicited on the form primes the student to consider applying to fewer colleges. These students may not have access to a computer and therefore may not be able to add colleges online. It raises a barrier to applying to more colleges. After all, isn't it a goal of the current administration to get students to apply to more colleges?</p> <p>25. Q. Step 7 on Page 8 The second paragraph in the signature section of the form makes four references to a "personal identification number" or "PIN." Replace theses with references to the FSA ID.</p> <p>26. Add Question about Special Circumstances Add a yes/no question that asks whether the applicant's ability to pay for college is affected by special circumstances. The question should give a few examples, such as the ones mentioned in the statute or the examples given in the first paragraph under "Filling Out the FAFSA"</p>		<p>24. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the paper <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>25. No Change. The language was developed to convey the definition of any electronic signature; not any one specific form of electronic signature.</p> <p>26. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p>

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	<p>on Page 1. This new question will allow college financial aid offices to proactively contact applicants who are affected by special circumstances for a possible professional judgment (PJ) review instead of waiting for the applicants to contact the financial aid office.</p> <p>27. FSA ID The current recovery process is extremely clunky and cumbersome. Students do not necessarily have access to their email when they are accessing fsaid.ed.gov. Some parents do not have email addresses, especially when the student is low-income or first-generation.</p> <p>Thirty (30) minute delays are also very frustrating for students and parents. Best practices involve delays only after repeated attempts to submit an incorrect password, not for password recovery. It also doesn't make sense to delay email by 30 minutes but only allow 10 minutes before the secure code expires. Students are unlikely to remember the questions and answers they chose, given that they typically use their FSA ID only once or twice a year, and the process requires a change in the FSA ID every 18 months. Why not add an additional recovery option, which is for the student to supply his or her PII (i.e., name, date of birth and Social Security Number)?</p> <p>28. General Add a question to ask about common professional judgment scenarios to set a flag so that college financial aid staff can proactively contact the student instead of reactively waiting for the student to contact them.</p> <p>29. General When a student is using FAFSA on the Web, consider</p>		<p>27. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>28. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p> <p>29. No Change. The Help and Hints topic that displays is tied to the <i>FAFSA on the Web</i> (FOTW) question with the current cursor focus.</p>

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	<p>switching to the next help text prompt if the student has completed the previous question and a certain number of seconds has passed. Currently, it remains on the old help text unless the student does something to trigger the next help text, such as clicking on the next question.</p> <p>30. General There is inconsistency in the capitalization of references to pages of the form. The page numbers all appear prefixed with the word "Page" (with the P in Page capitalized), but references to particular page numbers sometimes appear with the P in lowercase.</p> <p>31. IRS DRT The IRS Data Retrieval Tool does not currently handle married students and married parents who filed separate returns, either because they filed as married filing separately or because they were not married during the base year. In most cases, this should simply involve adding the data from the two separate returns. Adding such a capability to the FAFSA on the Web will significantly reduce the number of FAFSAs selected for verification.</p> <p>32. IRS DRT It would also be nice to have the capability of splitting income and assets for married couples who got divorced/separated since the end of the base year. There are two methods of separating the income from a joint return on page AVG-83 of the 2015-2016 Application and Verification Guide. One involves a 50% split. The other involves separating separate income that can be attributed based on a W-2. Although the W-2s are not available in the system that the IRS uses to implement the IRS Data Retrieval Tool, why can't the FAFSA provide the</p>		<p>30. No Change. The Department of Education considers this a stylistic preference.</p> <p>31. No Change. The Department of Education is currently assessing the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>32. No Change. The Higher Education Act (HEA) states that the income must be listed under the parent providing the support, when the applicant is a dependent student.</p> <p>When the applicant is an independent student, the income that can be attributed to each person should be sorted out even when there isn't a W-2. In these cases the school can permit the filer to provide a signed statement that certifies the base year adjusted gross income (AGI) and taxes paid. The 50% division applies when there is interest or business income earned on joint accounts or investments.</p>

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	<p>option of a 50% split? Also, if the custodial parent has remarried, one will have to add in the new spouse's income.</p> <p>33. Page 1: Applying by the Deadlines In the section labeled "Applying by the Deadlines" on Page 1, add a sentence such as, "Students who file the FAFSA early may qualify for more grants." As discussed in the student aid policy analysis paper, https://www.edvisors.com/ask/student-aid-policy/leaving-money-on-the-table/, students who file the FAFSA in the first three months of the FAFSA submission period tend to receive more than twice as much grant money as students who file the FAFSA later.</p> <p>34. Page 1: Using Your Tax Return The last paragraph in this section directs the applicant to call 1-800-4-FED-AID. If there is a page on studentaid.gov that provides help with answering the income information questions, perhaps you could list a short version of the URL in this paragraph after the telephone numbers?</p> <p>35. Page 1: Filing Out the FAFSA Perhaps add a reference to College Goal Sunday here? It is run by NCAN (non-profit 501(c)(3)). After all, if the IRS can mention VISTA in its publications, why can't the Department mention the College Goal Sunday program?</p> <p>36. Page 1: The trademark registration symbol looks like a blurry dot when the word FAFSA is in</p>		<p>33. No change. This recommendation is based on an assumption of school and state awarding philosophies. Because the timing of an applicant's <i>Free Application for Federal Student Aid (FAFSA®)</i> submission has no impact on his or her eligibility for federal student aid, the Department of Education does not believe it is appropriate to include such text on the FAFSA.</p> <p>34. No Change. Currently on Page 1 of the <i>Free Application for Federal Student Aid (FAFSA®)</i>, in the section "Filling Out the FAFSA", the URL link to StudentAid.gov is referenced to assist applicants in filling out the FAFSA. This specific URL reference gives applicants tips on how to complete the financial information on the FAFSA.</p> <p>35. No Change. College Goal Sunday is not a Federal Government-sponsored event, so the Department of Education cannot list it in Federal Student Aid documentation. While the Department of Education appreciates the work that NCAN does, this is not a change we can accommodate.</p> <p>36. No Change. The Department of Education considers this a stylistic preference.</p>

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	<p>Filing Out the FAFSA and Mailing Your FAFSA fine print. Either increase the size of the ® symbol, or omit it. From a trademark perspective, you only need to have the trademark registration symbol on the first or most prominent example.</p> <p>37. Page 2 The sentence, “If you are eligible for a Federal Pell Grant, you may receive it from only one college for the same period of enrollment” is not related to the question “When will I receive the student financial aid?” and so doesn’t belong in that section. It should either be omitted or moved to the “How much student financial aid will I receive?” section.</p> <p>38. SAR The Pell Grant eligibility language “provided you have not met or exceeded the lifetime limit established for the Federal Pell Grant program” seems unnecessary. Shouldn’t the lifetime eligibility used be available when the SAR is printed?</p> <p>39. SAR Think of the SAR as an opportunity for counseling, not just as a bureaucratic document intended for students and parents to review for errors.</p> <p>The counseling materials on the SAR could be much improved. For example, the loan information appears on page 4. It would be more effective if it were made available on the first page of the SAR, instead of burying it on page 4. Students generally don’t do math. Rather than tell them</p>		<p>37. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p> <p>38. No Change. The Student Aid Report provides specific information for students who are near, at or above the Pell Grant Lifetime Eligibility Used. This language is provided as additional guidance.</p> <p>39. No Change. The Department of Education believes the layout of the <i>Student Aid Report</i> (SAR) is sufficient to inform applicants about what they need to know.</p> <p>The purpose of the SAR is to provide information about a processed <i>Free Application for Federal Student Aid</i> (FAFSA®). While the SAR also includes general information about grants and loans, as well as limited information about a student’s financial aid history, a link to the <i>National Student Loan Data System</i> (NSLDS®) is also provided so applicants can access their detailed financial aid history.</p>

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	<p>that the monthly payment is approximately \$10.61 for every \$1,000 borrowed, why not add a column with the monthly payments? And add a last row with the total debt figures? (Or, if you're going to go with a rule of thumb, use a simpler rule of thumb that the monthly payment is approximately 1% of the amount borrowed? Note, by the way, that this should be "debt at repayment" not "that you borrowed," since students interpret the latter as the amount disbursed, not the total when the loan entered repayment.)</p> <p>Or, better yet, provide the total amount borrowed and the monthly payment assuming a 10-year repayment term, plus an additional line that estimates debt at graduation if you continue borrowing at the current rate, plus the monthly payment on a 10-year repayment term. For this material to have an impact on student borrowing, it not only needs to be personalized, but also give a sense as to the amount of debt at graduation and the corresponding monthly payment on a 10-year term.</p> <p>Also, why can't the SAR use the actual current interest rate on the loans? And, what about the accrued but unpaid interest that will be capitalized when the loan enters repayment?</p> <p>40. Finally, move the legalese to the last page of the SAR, instead of page 2. Return to comment #29.29.29.</p>		<p>40. No Change. Shifting the legal disclosures from page 2 to page 11 on the paper <i>Student Aid Report (SAR)</i> would place the disclosure on the back of page 10. Since page 10 needs to be submitted in the event a correction is made to the paper SAR, this would mean that the disclosure would also be submitted. The Department of Education prefers that the student retain the disclosure with his or her records.</p>
30	The South Carolina Tuition Grants Commission would like to provide comment in support of a recent comment/letter provided by the National Association of	Katie Harrison, South Carolina Higher Education	Refer to comment #3 for resolution.

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	<p>State Student Grant and Aid Programs (NASSGAP). Specifically relating to draft verbiage for the 2017-2018 FAFSA school choice section, we agree with NASSGAP's proposed verbiage of:</p> <p>"Enter the six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-800-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. 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 2."</p> <p>We, along with many other states, are very concerned that FSA is considering eliminating school list order from the information received by states. We wrote a letter to Under Secretary Mitchell outlining our concerns in February, and I am attaching that file here for your reference. I am also attaching a copy of the verbiage submitted by NASSGAP President Stephanie Butler, which we agree with and support here in South Carolina.</p> <p>Please feel free to contact me if I can provide any additional information.</p>	Tuition Grants Commission	
31	It is imperative that the state agencies continue to receive all the schools that a student list on the fafsa. These are used to aid in state grant and scholarship awarding. If this option is removed, it will cause undue burden on students/parents because an additional application will be required to apply and award these funds. It will also cause	Candi Frazier	Refer to comment #3 for resolution.

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	<p>an increased administrative burden for agency officials to collect this information and upload into their awarding system. Please continue to provide this information to these state agencies.</p>		
32	<p>Many states use the school list to ensure students are awarded state-level grants without requiring an additional application from the students. If ED continues with its plan to not share the school list with states, this will not only require retooling of several state systems, but it could easily result in the necessity of state agencies who do centralized awarding of financial aid to add steps students need to complete so they can be identified for awarding. Most importantly, this would be a disservice to students. We all understand why schools are no longer receiving the school lists, but there does not seem to be any evidence that states have ever misused the state list information.</p> <p>While Nevada has a decentralized grant program, and this decision does not directly impact our state, I am writing in support of the states where not receiving the school list will have a negative impact on students.</p>	Renee Davis, Nevada System of Higher Education	<p>Refer to comment #3 for resolution.</p>
33	<p>1. In item 27 on the paper FAFSA, information about the name, city, and state of the applicant's high school is requested. Please also add the year of high school graduation. This information will assist with identifying students who need to be included in the FAFSA Completion Initiative.</p> <p>2. The language in the Preparer's box is confusing and prompts many students to try to list non-profit agency personnel who assisted them at a FAFSA Completion event. Better language would be to state: "If a fee was paid to someone for advice or for completing this form, that person must complete this section."</p>	Christine Zuzack, Pennsylvania Higher Education Assistance Association	<p>1. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>2. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p>

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	<p>3. The language provided in Step 6 in which students indicate which colleges they want to receive their FAFSA information is not clear concerning the school list for state grant agencies. The following text is suggested as a replacement: "Enter the six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-500-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. 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 2." Please note that the text above assumes that the Department's proposal to randomize the list of schools provided to the state grant agencies will not be implemented since this would complicate the application process for students.</p> <p>4) Questions 44 c and f for students and questions 93 c and f for parents could be consolidated. Both of these items address earnings from student related employment and are treated the same in the need analysis formula. The questions could be combined as follows: "Taxable earnings from need-based employment programs, such as Federal Work Study, need-based employment portions of fellowships and assistantships, and work under a cooperative education program offered by a college."</p>		<p>3. Refer to comment #3 for resolution.</p> <p>4. No Change. Earnings from a cooperative education program and need based employment are different, and the Department of Education believes they should be asked separately to avoid confusion.</p>
34	The draft 2017-18 FAFSA released March 29, has instructions in Step Six stating that the Department will	Sharon Krahe, Gannon University	Refer to comment #3 for resolution.

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	<p>not share the student's school list (in any order) with state agencies, and further suggesting to students that the order in which they list schools does not matter - a significant change from the prior guidance. Department staff have indicated that, despite the proposed instructions in Step Six of the FAFSA, the school list will continue to be shared with the states. This information is not reassuring, since that is not what the proposed FAFSA language says. In fact, it is even more confusing to see that students will be told their list of schools will not be shared with the states, if that is not the case. The bottom line is that Department's proposed change to discontinue sharing the student's FAFSA school list, in the order provided by the students, with state student grant agencies will needlessly complicate the financial aid application process, decrease student awareness of state grant eligibility, and force state grant agencies to expend scarce dollars on system changes that could otherwise have been devoted to state student grant aid. This planned change to not show state agencies the students list of schools is in direct conflict with the simplification goal. Students and families will NOT understand why state agencies do not have access to the list of schools they put on their FAFSA. Please reconsider this change and allow states to receive the exact list of schools as indicated by the student.</p>		
35	<p>1. CASFAA supports the addition of Medicare as a means tested benefit on the FAFSA</p> <p>2. For questions 45 (e) and (f) and 94 (e) and (f) when families use the IRS Data Retrieval Tool to complete the FAFSA it is unable to determine and distinguish rollover amounts. If families correctly then update their information to reflect the proper rollover amounts, it</p>	<p>Rachelle Feldman, CASFAA Vice President, Federal Issues</p>	<p>1. Thank you for the comment.</p> <p>2. The Department of Education is currently assessing possible solutions.</p>

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	<p>changes the DRT flag to indicate that the submitted FAFSA/ISIR data needs review. This causes extra burden for families and for financial aid officers. We suggest that rollover amounts be collected in separate fields and the math to subtract the rollover amount from the total be done by the FAFSA in the background.</p> <p>3. Page 10 States the following under the heading “Notes for students unable to provide parental information” Under very limited circumstances (for example, your parents are incarcerated; you have left home due to an abusive family environment; or you do not know where your parents are and are unable to contact them), you may be able to submit your FAFSA without parental information. If you are unable to provide parental information, skip Steps Four and Five, and go to Step Six. Once you submit your FAFSA without parental data, you must follow up with the financial aid office at the college you plan to attend, in order to complete your FAFSA. We suggest the following changes in Bold: Under very limited circumstances (for example, your parents are incarcerated; you have left home due to an abusive family environment; or you do not know where your parents are and are unable to contact them), you may be able to submit your FAFSA without parental information. If these situations prevent you from providing provide parental information, skip Steps Four and Five, and go to Step Six. Once you submit your FAFSA without parental data, you must follow up with the financial aid office at the college you plan to attend, in order to complete your FAFSA. Your financial aid office may require documentation from social services; clergy; high school counselors or individuals that are familiar</p>		<p>3. No Change. The Department of Education believes that the guidance provided is adequate, and that adding additional bolding to certain words takes away meaning from the rest of the section.</p>

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	<p>with your situation.</p> <p>4. Page 8, Step 7 refers to PINs which are not used anymore are not used anymore. Page 8, Step 7. This text needs to be replaced with FSA ID.</p> <p>5. For CA students and those for some other states there is a form separate from the FAFSA to file for state or institutional aid. Thus the instructions “If you have a Social Security Number but are not a citizen or and 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.” We suggest amending to: “If you have a Social Security Number but are not a citizen or and eligible noncitizen, including if you have been granted DACA, you should check with your state and complete the appropriate state form and/or the FAFSA because you may be eligible for state or college aid.”</p> <p>6. As the full list of schools will not be sent to institutions, we suggest that the FAFSA allow students to list more schools and colleges on their initial application.</p> <p>7. CASFAA recommends that for 2017-18 for families where they have identified conflicting information that schools must resolve to please include a “C” code on the ISIR to make it easy for schools to flag and resolve these cases.</p> <p>Return to comment #35.</p>		<p>4. Refer to comment #29.25 for resolution.</p> <p>5. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p> <p>For 2015-2016, <i>FAFSA on the Web</i> (FOTW®) was updated, based on California’s request, to include instructions for California students with DACA status in the California state deadline information.</p> <p>6. Refer to comment #1.1 for resolution.</p> <p>7. Refer to comment #23.1 for resolution</p>
36	1. For question 16. What is your marital status as of today? The student may have gotten married within a	Anonymous	1. For 2017-2018, the Department of Education is adding messaging to <i>FAFSA on the Web</i> (FOTW®) to assist applicants and parents in determining

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	<p>month prior to signing FAFSA, but on tax return filed single (Question 34). They will receive an error message asking to verify martial status. The wording should reflect the tax season perhaps January 1, 2015-December 31, 2015 since that the tax information they will be using.</p> <p>2. Under the dependency status allow student the option to check military status if necessary a lot of times it is grayed out and the option is not available.</p> <p>3. Under the financial information the options for Receiving SSI, SNAP, Free or reduce lunch, TANF, or WIC are some time grayed out and the option is not available.</p>		<p>their financial information if they experienced a marital status change after filing their 2015 income tax return. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p> <p>2. No Change. The purpose of Questions 46 through 58 is to determine the applicant's dependency status. In an effort to simplify the application and reduce burden, the Department of Education implemented logic in <i>FAFSA on the Web</i> (FOTW®) that prevents all remaining dependency questions from displaying once an applicant is determined to be independent.</p> <p>3. Refer to comment #2.1 for resolution.</p>
37.	<p>The Pennsylvania Commission for Community Colleges is concerned that Step Six - the step in which the student lists the colleges that should receive the FAFSA information - states, "It does not matter in what order you list your selected schools." We believe that this step should not be changed, and the student should list their college preferences in order. In addition, masking the order in which students have listed their schools on their FAFSAs for state grant agencies - in our case, the Pennsylvania Higher Education Assistance Agency (PHEAA) - will negatively impact students and create hurdles for PHEAA's administration of the program specifically related to effective budgeting and appropriations forecasting. If the FAFSA school order list is masked or randomized, it will immediately disadvantage students by creating the confusion of having to confirm with the state grant agency what their actual school attendance will be.</p>	<p>Pennsylvania Commission for Community Colleges</p>	<p>Refer to comment #3 for resolution.</p>
38	<p>The Center for Law and Social Policy (CLASP) is an anti-poverty non-profit organization that advocates for policies that improve the economic security of low-income</p>	<p>Lauren Walizer, Senior Policy Analyst, Center for</p>	

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	<p>families. The Center for Postsecondary and Economic Success at CLASP seeks reforms to postsecondary and workforce policies that will create pathways for these individuals to education and work.</p> <p>1. As such, we applaud the change to question 97, which adds Medicaid as a qualifier for the Simplified Needs Test (SNT). This change is significant for low-income individuals for several reasons.</p> <p>First, this change will simplify and shorten the FAFSA application process for hundreds of thousands of low-income individuals and thus increase their opportunities to receive the full financial aid for which they are eligible. The expansion of Medicaid under the Affordable Care Act has led to 15 million additional people having access to quality health care across the United States. An analysis of a recent Congressional Research Service (CRS) estimate reveals over 800,000 currently enrolled students ages 17-55 could be eligible under this change (including nearly 600,000 between the ages of 17 and 23). An additional 4 million people between the ages of 17 and 55 could be eligible if they enroll in postsecondary education at a future time. The CRS report does not account for the expansion of Medicaid eligibility post-2012, which means the potential pool of beneficiaries is likely to be even higher than estimated here.</p> <p>Second, routing students who are Medicaid recipients to the SNT means they will have a significantly expedited application process. The SNT is an alternative way for the FAFSA to calculate a student or family's Expected Family Contribution (EFC). An independent student completing the FAFSA would be eligible for the SNT if his (and</p>	<p>Law and Social Policy</p>	<p>1. Thank you for the comment.</p>

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	<p>spouse's, if any) adjusted gross income (AGI) is below \$50,000, and if one of the following are true: he files a simplified tax return or isn't required to file one; he is a dislocated worker; or he received benefits from one of five means-tested programs in the prior two years. (The rules are the same for a dependent student, except that the tax return and dislocated worker pieces are applied to the applicant's parents, and the means-tested benefits standard applies to anyone in the household.) In 2012, 13 percent of dependent students, and nearly a quarter of independent students, reported on the FAFSA that they received a federal means-tested benefit in either of the prior two years (CLASP analysis of NPSAS:12 data). The addition of Medicaid increases the number of eligible means-tested programs from five to six. Allowing recipients of Medicaid – who, we would argue, have already proven their low-income status through receipt of this means-tested program – to use the SNT allows them to report on only six elements, none of which should require lengthy calculations or paperwork, including AGI, federal taxes paid, and the number of family members in the household.</p> <p>Third, the length and difficulty of completing the FAFSA application, in general, is a common barrier for students. Three out of 10 undergraduates – and nearly four out of 10 community college students – do not complete the FAFSA. Among students who cited that the “forms were too much work” as a reason they did not apply, half had incomes under \$50,000, and close to 40 percent would have qualified for a Pell Grant. Community college students, who may be among the least likely to complete the form, may also benefit the most from this change.</p>		

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	<p>Recent research found that nearly one-quarter of community college students are recipients of Medicaid (or other government-sponsored insurance). Having a dramatically shorter FAFSA would greatly improve the chances that these students will complete the form and give them access to financial aid they would have otherwise foregone.</p> <p>An increase in FAFSA applications can improve the chances of students staying in school and completing their studies. Research that controlled for student background characteristics and college experience found that FAFSA filers had a 72 percent greater chance of persisting than non-filers. For Pell-eligible students, this effect was even greater: filers had a 122 percent greater chance of staying in school. For students who would have completed the FAFSA regardless of the announced change, it could provide them with a small amount of additional financial aid, reducing their unmet financial need. Too often, students lack the financial resources to continue their program of study, and have no option but to drop out. While we greatly appreciate the addition of Medicaid, we would encourage the Department to continue to consider ways to make the framing for questions 97 through 101 more transparent for students and families to understand, so it is clear to them that answering these questions can only help to simplify their FAFSA process and calculate an EFC that better reflects their financial status.</p> <p>2. We also want to take this opportunity to share our support of the change to allow for prior-prior year income beginning with this FAFSA. This is another strategy that supports a simpler FAFSA completion process. Allowing</p>		<p>2. Thank you for the comment.</p>

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	<p>applicants to use income from the prior-prior year will make it easier for low-income students to apply for aid using the IRS Data Retrieval Tool, which can automatically import their tax information. This will save students time and paperwork and allow them to apply for financial aid earlier. By accessing more relevant information further in advance, students will be able to make more informed college decisions, as well as apply for state and institutional grant aid that is given out on a first-come, first-served basis.</p> <p>According to a report on the potential impact of a prior-prior year policy, independent students without dependents are the most likely to see a change in their Pell award of \$1,000 or more when using tax information from two years prior. Additionally, while this policy will help many students obtain the financial aid they need, it is important to protect students who have experienced a significant drop in income between the prior-prior year and the time of enrollment. We encourage the Department to use materials and guidance to remind institutions about their authority to exercise professional judgment on this issue, and advising students about their right to request a professional judgment appeal. We believe this action will further codify President Obama’s remarkable legacies around education and health care access. The expansion of Medicaid has allowed millions to receive more affordable health care, and has particularly benefited low-income groups such as uninsured adults, parents with dependent children, working adults, and veterans. Individuals with characteristics such as these are the core population of today’s non-traditional postsecondary students, who are</p>		

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	<p>more likely to attend college while caring for families or working, or are low-income. Connecting them with available resources is imperative for both their health, and for opportunities to further their education and training.</p>		
39	<p>The draft 2017-18 FAFSA released March 29, has instructions in Step Six stating that the Department will not share the student's school list (in any order) with state agencies, and further suggesting to students that the order in which they list schools does not matter - a significant change from the prior guidance. Department staff have indicated that, despite the proposed instructions in Step Six of the FAFSA, the school list will continue to be shared with the states. This information is not reassuring, since that is not what the proposed FAFSA language says. In fact, it is even more confusing to see that students will be told their list of schools will not be shared with the states, if that is not the case. The bottom line is that Department's proposed change to discontinue sharing the student's FAFSA school list, in the order provided by the students, with state student grant agencies will needlessly complicate the financial aid application process, decrease student awareness of state grant eligibility, and force state grant agencies to expend scarce dollars on system changes that could otherwise have been devoted to state student grant aid. This planned change to not show state agencies the students list of schools is in direct conflict with the simplification goal. Students and families will NOT understand why state agencies do not have access to the list of schools they put on their FAFSA. Please reconsider this change and allow states to receive the exact list of schools as indicated by the student. Here is a recommendation of revised language for the 2017-18 FAFSA instructions: Enter the</p>	Nate Hench	<p>Refer to comment #3 for resolution.</p>

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	<p>six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-500-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. 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 2.</p>		
40	<p>1. Veterans Education Success believes that the Department should restore the questions about service member and veteran status for all applicants. Although this change was not made prior to releasing the draft for public comment, we request that the Department do so before finalizing the 2016-17 FAFSA. We remain convinced that such a change is both good and necessary public policy.</p> <p>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</p>	Walter Ochinko, Veterans Education Success	1. Refer to comment #36.2 for resolution.

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	<p>and colleges to target their outreach to service members and veterans as early as possible in the aid application process. Although some veterans and servicemembers may not need to take out student loan because of their military educational benefits, many complete the FAFSA to determine their eligibility for Pell Grants. Second, it limits the ability of institutions to provide targeted services to active duty personnel and veterans in order to increase retention and graduation rates. Given that about 60 percent of veterans using the GI Bill are the first in their families to attend college, such services are critical to ensuring success and protecting the taxpayer investment in their transition to civilian life. Third, 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 burdensome debt. The Department of Veterans Affairs has paid about \$60 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>2. No Change. The Department of Education believes the questions and</p>

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	<p>2. 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>instructions provide adequate guidance.</p>
41	<p>1. In question 59 where it asks for the legal parents, it needs to be more clear that this is the primary physical parent and any step parent that may be in that household.</p> <p>2. Also, under Notes for Step Four, questions 59-94, the statement "If this parent is remarried as of today, answer the questions about that parent and your stepparent." should be also listed under the unmarried section for students whose biological parents never married.</p>	Shannon Amundson	<p>1. No Change. The Department of Education believes the notes provided for Step 4 on page 10 are adequate.</p> <p>2. No Change. In the instance where legal parents are unmarried and living together, there is no step-parent.</p>
42	<p>The wording of questions 32, 39 and 44d do not help students receiving grants and scholarships up to the full cost of attendance in reporting the funds received in excess of tuition, fees (excluding room and board), books and mandatory supplies. Question 32 asks about tax filing and these students will often answer I'm not going to file. Question 39 restricts the response to income from working which is accurately zero even though the scholarship/grant income in excess of tuition, fees, books and mandatory supplies may be well over \$11,000. Could question 39 be revised for an a./b. response with a. remaining How much did you earn from working in 2015 and b being How much grant/scholarship support did you receive in 2015? Alternatively question 44d about</p>	Anonymous	<p>No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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	<p>additional financial information could be revised to exclude the "reported to the IRS in your adjusted gross income" comment if the student answered I'm not going to file in question 32. This often unreported income can have a huge impact on Federal Pell Grant eligibility and many students who have never worked are ignorant of the fact that scholarship/grant funds can cause them to have a tax liability. This seems particularly relevant given the recent and highly publicized changes for NCAA regulations which now allow student athletes to receive aid up to the full cost of attendance when combined with Federal Pell Grant and Title IV aid requirements which allow students to receive the Federal Pell Grant plus one other award (such as a full cost of attendance athletic scholarship) even if it causes total aid to exceed the student cost of attendance.</p>		
43	<p>The instructions in Step Six stating that the Department will not share the student's school list (in any order) with state agencies and that the order in which students list schools does not matter is a significant change from the prior guidance. Department staff have indicated that, despite the proposed instructions in Step Six of the FAFSA, the school list will continue to be shared with the states. This information is not reassuring, since that is not what the proposed FAFSA language says. In fact, it is even more confusing to see that students will be told their list of schools will not be shared with the states, if that is not the case. The bottom line is that Department's proposed change to discontinue sharing the student's FAFSA school list, in the order provided by the students, with state student grant agencies will needlessly complicate the financial aid application process, decrease student awareness of state grant eligibility, and force state grant agencies to expend scarce dollars on system changes that</p>	Anonymous	<p>Refer to comment #3 for resolution.</p>

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	<p>could otherwise have been devoted to state student grant aid. This planned change to not show state agencies the students list of schools is in direct conflict with the simplification goal. Students and families will NOT understand why state agencies do not have access to the list of schools they put on their FAFSA. Please reconsider this change and allow states to receive the exact list of schools as indicated by the student. Here is a recommendation of revised language for the 2017-18 FAFSA instructions: Enter the six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-500-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. 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 2.</p>		
44	<p>Given that many 2016-17 FAFSA filers have used the DRT, and given that the FOTW already pre-populates many values from the prior year application, wouldn't it make sense for the 2017-18 FOTW to include all data that includes the notation "transferred from the IRS" from the '16-'17 DRT process?</p>	Mark Anderson	<p>No Change. The Department of Education has determined that there are too many instances where such pre-populating would result in incorrect information being included on the 2017-2018 <i>Free Application for Federal Student Aid (FAFSA®)</i> - e.g., changes in dependency status, changes in marital status, professional judgment.</p>
45	<p>Our goal in submitting these comments is to ensure that the student aid application process is as easy and transparent as possible for students and their families. The Administration has already taken important steps to substantially simplify the FAFSA, including by letting students apply for aid earlier and more easily starting in the 2017-18 aid year, a change long championed by TICAS.</p>	Lindsay Ahlman Lauren Ascher TICAS	

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	<p>We have also recommended ways to further simplify the financial aid application process by eliminating 20 burdensome FAFSA questions,¹ which we recognize is beyond the scope of this information collection.</p> <p>1. The Department has continued to improve the aid application process by adding Medicaid receipt as a qualification for the simplified needs test in questions 75 and 97. While our comments below include suggestions for clarifying the instructional language for these questions, we applaud the Department for making this important change. As noted by the Center for Law and Social Policy (CLASP) in their comments on the draft 2017-18 FAFSA, it will “simplify and shorten the FAFSA application process for hundreds of thousands of low-income individuals and thus increase their opportunities to receive the full financial aid for which they are eligible.”</p> <p>2. We also thank the Department for providing additional guidance to students who might face unexpected costs that could affect their financial need, by modifying the “unusual circumstances” text on the final 2016-17 FAFSA and retaining this text in the draft 2017-18 FAFSA.</p> <p>3. We are also encouraged by ongoing conversations between Federal Student Aid (FSA) and the Internal Revenue Service (IRS) exploring ways to enhance the IRS Data Retrieval Tool (DRT). Our comments reflect our recommendations that such discussions continue to seek ways to expand access to the DRT where possible, and we look forward to hearing about the outcomes of this ongoing work.</p> <p>4. While outside the scope of the current request for</p>		<p>1. Thank you for the comment.</p> <p>2. Thank you for the comment.</p> <p>3. Thank you for the comment.</p> <p>4. Thank you for the comment.</p>

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	<p>comments, we would like to note here our concern about the Department’s new verification hurdle for non-tax-filers in 2017-18, requiring such FAFSA applicants flagged for verification to secure and submit a form from the IRS confirming that they did not file taxes. Low-income students face significant hurdles during the verification process. Given this requirement’s potential for additional burden on students who did not file a federal tax return because their income was too low to owe federal income tax, we strongly encourage the Department to provide data demonstrating the need for and potential benefits of this requirement. This new paperwork would be in addition to a statement self-certifying they did not and were not required to file taxes and also providing the amounts and sources of their earned income. IRS information indicates that a request for this form could take up to 10 business days to process, and the form simply confirms that the student or parent did not file taxes without indicating whether or not they were required to.</p> <p>Our comments below focus on areas where more clarity and streamlining will make the FAFSA easier to understand and use, helping applicants get the aid for which they are eligible. Unless otherwise specified, our recommendations about questions, notes, and instructions follow the organization of the 2017-18 draft paper FAFSA. Where applicable, <i>italics</i> indicate suggested modifications, strikethroughs indicate suggested deletions, and underlines suggest text relocation. Our recommendations also apply to FAFSA on the Web (FOTW) and FAFSA on the Phone (FOTP) wherever relevant. As discussed further below, it is essential that</p>		

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	<p>simplification efforts extend to all print and online products and interactions, so that all potential aid applicants can benefit. Our comments include some new and many prior recommendations, and are organized into four main sections: the FAFSA, the FAFSA submission page, the IRS Data Retrieval Tool, and the FAFSA public comment process. Limited comments specific to FOTW are included throughout this document.</p> <p>5. The FAFSA Page 1 Modify text of “Using your Tax Return” section The section “Using Your Tax Return” on page 1 can provide more clear direction by putting the most important information at the top, relocating information related to application deadlines to the “Applying by the Deadlines” section, and clarifying that this form requests tax data from 2015.</p> <p>We strongly recommend that this section start with information relevant to its title by moving to the top what is currently the second paragraph, which begins with “The easiest way...” Furthermore, to clarify the change to using the tax data available in the fall, the last sentence of this paragraph should be, “This form requests information from your (or your parent’s) 2015 tax filing.” Relocating the draft section’s current first sentence, as recommended below, creates space for this new sentence. The second paragraph of this section would then begin, “If you (or your parents) have missed the 2015 tax filing deadline...” The third paragraph, starting with “Note:” would remain the same in text and location.</p>		<p>5. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p>

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	<p>Because it pertains to deadlines rather than using tax return information, we recommend that the first sentence in what is currently the first paragraph of “Using Your Tax Return” (it reads, “We recommend that you complete and submit your FAFSA as soon as possible on or after October 1, 2016”) be moved and integrated into the preceding “Applying by the Deadlines” section. The first paragraph in “Applying by the Deadlines” would then begin: “For federal aid, submit your application FAFSA as early soon as possible, but no earlier than on or after October 1, 2016.”</p> <p>With all these recommended revisions, the full “Using Your Tax Return” section would read as follows:</p> <p>The easiest way to complete or correct your FAFSA with accurate tax information is by using the IRS Data Retrieval Tool through www.fafsa.gov. In a few simple steps, most student and parents who filed a 2015 tax return can view and transfer their tax return information directly into their FAFSA. This form requests information from your (or your parent’s) 2015 tax filing.</p> <p>If you (or your parents) have missed the 2015 tax filing deadline of April 2016, and still need to file a 2015 income tax return with the Internal Revenue Service (IRS), you should submit your FAFSA now using estimated tax information, and then you must correct that information after you file your return.</p> <p>Note: Both parents or both the student and spouse may need to report income information on the FAFSA if they did not file a joint tax return for 2015. For assistance with answering the income information questions in this</p>		<p>6. No Change. The Department of Education disagrees that the existing text is unclear, and does not wish to limit the applicant’s special circumstances to a more specific period in time.</p>

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	<p>situation, call 1-800-4-FED-AID (1-800-433-3243).</p> <p>6. Modify text in “Filling Out the FAFSA “ The “Filling Out the FAFSA” section on page 1 is unclear about the timing of changes in applicants’ financial situations that may merit their contacting an institution’s student financial aid office. Specifically, the current text does not make clear whether it is referring to changes that have occurred after the tax filing, or after filing the FAFSA, or financial hardships not captured in the FAFSA. We recommend the following language for the first paragraph in this section: “If you or your family experienced significant changes to your financial situation (such as loss of employment), or other unusual circumstances (such as high unreimbursed medical or dental expenses), since filing your 2015 taxes, complete this form to the extent you can and submit it as instructed, then consult with the financial aid office at the college(s) you applied to or plan to attend. You can also contact the school if such changes occur after filing the FAFSA.”</p> <p>7. Page 2 Include brief explanation of what to expect after filing 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. We continue to recommend that page 2 provide a brief explanation of what to expect after you file, so that students do not have to wait until after they have submitted the FAFSA to find out about the rest of the process. At a minimum, this information should be included for students using FOTW.</p>		<p>7. No Change. Space constraints do not permit this change to the paper <i>Free Application for Federal Student Aid (FAFSA®)</i>. On <i>FAFSA on the Web (FOTW®)</i>, the “Next Steps” section of the “Browse FAQs” on the “Help” page provides links to relevant help text.</p>

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	<p>This information, provided at the early stages of the process, would be especially helpful to those applying for aid for the first time. If space permits, we suggest adding the following text as a new section titled “What happens after I file the FAFSA?” or at the end of the current “Why fill out a FAFSA?” section: “After submitting the FAFSA, you will receive a Student Aid Report (SAR), which summarizes the data you submitted on the FAFSA and provides information on federal aid eligibility. Later you will receive financial aid award letters from colleges to which you have applied, indicated on the FAFSA, and have been accepted. These award letters will contain more details on the aid for which you qualify.”</p> <p>8. The same information should also be provided on the FOTW Introduction Page, as a new link titled “What happens after I file the FAFSA?” A link to the FAFSA Process Infographic, once updated (as is planned by 6/30/16 per Federal Student Aid Resources for the 2017-18 FAFSA®), would direct users to this helpful resource.</p> <p>9. Rename “When will I receive the student financial aid?” section The current text in the “When will I receive the student financial aid?” section on page 2 provides useful information, but it is not about timing as the title implies. Rather, this paragraph describes the order in which the aid is applied to costs of attendance. We recommend changing the title of this section to “How will I receive the student financial aid?” to better reflect its content.</p> <p>10. Page 5 Restore active duty service member and vets questions for</p>		<p>8. Refer to comment #45.7 for resolution.</p> <p>9. No Change. The Department of Education does not believe this change enhances the user experience.</p> <p>10. Refer to comment #36.2 for resolution.</p>

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	<p>all FOTW users (Questions 49 & 50)</p> <p>We continue to urge the department adjust the “skip-logic” function in the FOTW to restore active duty service member and veteran identification questions for all students using the FOTW. Currently, applicants 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. There is already precedent for allowing both independent and dependent applicants the opportunity to identify themselves as a type of student who would be eligible for additional aid based on a special status. This is the case for the foster youth screening question that is asked of both independent and dependent applicants in the student eligibility section of FOTW.</p> <p>Allowing all service members and veterans the opportunity to identify their status when they apply for federal student aid will 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. It would also improve the available data on federal student aid usage by veterans and service members. U.S. Senators Carper and Hirono requested the restoration of these questions for all users in a letter to Secretary Duncan on July 30, 2014. Furthermore, Veterans Education Success has requested this change in comments submitted on the 16-17 draft FAFSA and again in their comments submitted on the current 17-18 draft FAFSA. The questions about military background are both important and easy to answer in a matter of seconds, and as such we do not believe such questions represent a meaningful burden or are contrary to the Department’s</p>		<p>11. Refer to comment #29.20 for resolution.</p>

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	<p>commitment to simplify the application.</p> <p>11. Simplify questions identifying unaccompanied homeless youth (Questions 56-58) Making the questions on the paper FAFSA easier for students to understand is particularly important for those who are homeless or at risk of homelessness. Using 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 is an unnecessarily burdensome, complex, and confusing approach. The paper form should ask just one simple screening question – as FOTW already does – accompanied by a more detailed Notes section. Specifically, we continue to recommend replacing questions 56, 57, and 58 – which are long, confusing, and still do not cover all of the potential combinations of status and source of determination – with the following single question, which is already used as a filtering question in FOTW:</p> <p>On or after July 1, ____ [relevant year], were you homeless or were you self-supporting and at risk of being homeless? (See Notes on p. __ for how to answer this question.)</p> <p>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, [relevant year], that you were an unaccompanied youth who was homeless, or self-supporting and at risk of being homeless, from any of the</p>		

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	<p>following sources:</p> <ul style="list-style-type: none"> - 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>In response to our October 2014 comments, the Department noted that it worked with a number of other agencies to develop the current three-question approach, which would generate additional information about the population of homeless students that would be useful for institutions. We appreciate this effort and intent, however, this approach does not efficiently accomplish the goal of identifying the homeless student population to begin with. Prior to collecting more granular information about this population, applicants must have sufficient clarity about whether or not they qualify as homeless for the purposes of federal financial aid (see page 7 of our comments on the current notes for questions 56-58). If the Department would like to collect information on which source can confirm the applicant's homeless status, additional questions can be asked of applicants who first answered 'yes' to a simpler, single screening question.</p> <p>12. Page 6</p> <p>Modify instructional text before simple needs test</p>		<p>12. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p>

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	<p>qualifying benefits (Questions 75-79)</p> <p>The updated text on page 6 before questions 75-79, and on page 8 before questions 97-101, provides instruction for students who would need to update their FAFSA if they or someone in their family receive any of the six means-tested benefits qualifying for the simplified needs test (SNT). But it does not clearly convey the window of time for changes that would require students to update their FAFSA. We also share CLASP's concern that this text does not make clear that these questions related important benefits such as a simplified application process and an EFC that more accurately reflects a student's true financial status. We encourage the Department to convey these benefits in the instructional text preceding these questions.</p> <p>To clarify the timing language, we recommend the text preceding questions 75-79 read as follows:</p> <p>For 2015 or 2016, At any time during 2015 or 2016, did you, your parents, or anyone in your parents' household (from question 73) receive benefits from any of the federal programs listed below? Mark all that apply. Answering these questions will not NOT reduce eligibility for student aid or these programs. TANF has different names in many states may have a different name in your parents' state. Call 1-800-433-3243 to find out the name of the your state's program. If, at the time you are completing the FAFSA, you, your parents, or anyone in your parents' household did NOT receive any of these benefits during 2015 or 2016, but do receives any of them these benefits after filing the FAFSA on or before but</p>		

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	<p>before December 31, 2016, you must return to the FAFSA and update your response by logging into fafsa.gov and selecting “make FAFSA corrections.”</p> <p>The above text, without in-line edits, reads as follows:</p> <p>At any time during 2015 or 2016, did you, or your parents, or anyone in your parents’ household (from question 73) receive benefits from any of the federal programs listed? Mark all that apply. Answering these questions will NOT reduce eligibility for student aid or these programs. TANF has different names in many states. Call 1-800-433-3243 to find out the name of your state’s program. If you, your parents, or anyone in your household receives any of these benefits after filing the FAFSA but before December 31, 2016, you must update your response by logging into fafsa.gov and selecting “make FAFSA corrections.”</p> <p>Similar changes should be made on page 8 before questions 97-101:</p> <p>For 2015 or 2016, At any time during 2015 or 2016, did you (or your spouse) or anyone in your household (from question 95) receive benefits from any of the federal programs listed? Mark all that apply. Answering these questions will not NOT reduce eligibility for student aid or these programs. TANF may have a different name in your state has different names in many states. Call 1-800-433-3243 to find out the name of the your state’s program. If, at the time you are completing the FAFSA, you (or your spouse) or anyone in your household did NOT receive any of these benefits during 2015 or 2016, but do receives any of them these benefits after filing the FAFSA on or before</p>		

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	<p>but before December 31, 2016, you must return to the FAFSA and update your response by logging into fafsa.gov and selecting “make FAFSA corrections.”</p> <p>The above text, without in-line edits, reads as follows:</p> <p>At any time during 2015 or 2016, did you (or your spouse) or anyone in your household (from question 95) receive benefits from any of the federal programs listed? Mark all that apply. Answering these questions will NOT reduce eligibility for student aid or these programs. TANF has different names in many states. Call 1-800-433-3243 to find out the name of your state’s program. If you (or your spouse) or anyone in your household receives any of these benefits after filing the FAFSA but before December 31, 2016, you must update your response by logging into fafsa.gov and selecting “make FAFSA corrections.”</p> <p>13. Finally, we recommend also including on the FOTW a link to an online resource such as http://www.acf.hhs.gov/programs/ofa/help for identifying the name of each state’s TANF program. If space permits, this hyperlink should also be included on the paper FAFSA.</p> <p>14. Page 10 Include link to online resources for students with parents who are unmarried and living together in “Notes for Step Four, questions 59-94 (pages 6 and 7)”</p> <p>We appreciate that the Department included in the instructions on page 6 the link to the additional consumer resources it developed to help students whose parents are unmarried and living together, as we recommended in our 2016-17 comments. This user-friendly online information</p>		<p>13. No Change. <i>FAFSA on the Web</i> (FOTW®) currently includes a hyperlink next to both the student and parent TANF questions to this site: http://archive.acf.hhs.gov/programs/ofa/states/tnfnames.htm</p> <p>14. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p>

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	<p>provides a needed alternative to phone assistance. In prior comments, we also recommended including this link on page 10 as well, in the “Notes for Step Four, questions 59-94” section. The 2017-18 draft text of this section currently only refers students to 1-800-433-3243, which is of limited use to students unable to call during the operating hours of that hotline (Monday-Friday, 8am-10pm ET). We therefore suggest that the final sentence of the second bullet in this section read: “Contact 1-800-433-3243 for assistance in completing questions 80-94, or see StudentAid.gov/fafsa-parent.” We believe there is enough space on the paper FAFSA for this change, and that the additional promotion of such a valuable online resource merits this change.</p> <p>15. Modify notes for unaccompanied homeless youth question (Questions 56-58) 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 and the definition the Government Accountability Office used in its study on disconnected youth: “YOUTH” means you are 21 23 years of age or younger... We appreciate the clarity that the Department provided in its July 29, 2015 Dear Colleague Letter, which states: “Applicants who are between the ages of 21 and 24 and who are unaccompanied and homeless or self-supporting and at risk of being homeless qualify for a homeless youth determination, and will be considered independent students.” This instruction potentially mitigates an unfair loophole that previously prevented homeless and at-risk youth aged 22 and 23 from being granted independent</p>		<p>15. This is a significant change that requires adequate time to properly implement. The Department of Education plans to make this change to the 2018-2019 <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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	<p>student status. The 2016-17 Application and Verification Guide also specifies that students ages 22 and 23 who otherwise meet the criteria for unaccompanied homeless youth “qualify for a homeless youth determination.” Unfortunately, this clarity is obscured by the youth definition contained in both the Application and Verification Guide, and in the paper FAFSA. The Notes for questions 56-58 (page 5) on page 10 of the paper FAFSA still defines Youth as “21 years of age or younger...”. Applicants must read through the text that begins “Answer ‘no’ if you are not homeless...” to find “...you should contact your college financial aid office for assistance if you are under 24 years of age...” which adds unnecessary confusion. If colleges have already been given direction that homeless and at-risk youth ages 22 and 23 are considered independent, there is no reason to direct these students to contact their financial aid offices. Rather, applicants can be told upfront that for the purposes of answering the homelessness status question, youth means 23 years or younger. FOTW should also be adjusted to reflect this functional definition.</p> <p>In responding to our prior comments on this matter, the Department has stated that “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.” It is our understanding that this law is not the relevant controlling legislation, and we again urge the Department to revise its age definition to ensure that 22- and 23-year old students in need do not face unnecessary barriers to receiving the aid for which they may be eligible.</p>		<p>16. Text has been updated. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p> <p>17. The Department of Education continues to explore ways to increase</p>

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	<p>16. FAFSA Submission Page</p> <p>We commend the Department for improving the information on the confirmation screen seen by applicants who answer ‘yes’ to the foster youth screening question. However, the additional information about potential added grant assistance for current and former foster youth is not as prominently displayed as Pell Grants and loans. We recommend underlining or bolding the text “You may be eligible for assistance through federal programs for foster youth” or including it in the bulleted list in order to make sure students don’t overlook this important information.</p> <p>17. IRS Data Retrieval Tool (DRT)</p> <p>Add explanation of DRT ineligible determination on FOTW We appreciate that the Department updated the FOTW to include a statement to help students determine if they are eligible to use the IRS DRT. Unfortunately, users who are told they cannot use the DRT are given no additional information as to why they are ineligible or what they can do to possibly become eligible in the future. We therefore urge the Department to ensure users ineligible to use the DRT are also told why, and that they can return and try again, and approximately how soon, when appropriate.</p> <p>18. Explore expanding the use of the DRT</p> <p>We encourage the Departments to continue to work with the IRS to explore extending access to the IRS Data Retrieval Tool (DRT) to more applicants and potential applicants, including by expanding the categories of tax</p>		<p>the number of applicants and parents who can use the IRS Data Retrieval Tool (IRS DRT) to transfer tax information that correctly answers questions on the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>18. Refer to comment #45.17 for resolution.</p>

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	<p>filers who can use the DRT, and also expanding the number of forms whose data can be imported into the FAFSA.</p> <p>As detailed in our February 2015 memo, and in our comments on the draft 2015-16 FAFSA, certain types of tax filers cannot use the DRT to transfer tax data to their FAFSAs due to their tax filing status. These include tax filers who are married but file separate tax returns, those who file as head of household, parents who are unmarried and living together, those who file amended tax returns, those who file Puerto Rican or foreign tax returns, and those who changed marital status since Dec 31 of the prior year. We continue to recommend the Department and IRS consider making the DRT available to some or all of these categories of filers, and whether the use of prior-prior tax year data starting in 2017-18 will make it easier to add certain categories, i.e., if some filers are currently excluded due to longer processing times for their particular type of return.</p> <p>19. The DRT currently 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. The use of prior-prior year tax data could provide new opportunities for users to import additional tax data, such as from the W-2 and 1099 forms, which can take longer for the IRS to process than 1040 data.</p> <p>20. Explore ways to integrate DRT into the FAFSA4caster</p> <p>We continue to encourage the Department to consider</p>		<p>19. No Change. Based on detailed conversations with the Internal Revenue Service (IRS), the Department of Education has determined that current and complete W-2 information may not always be available for all FAFSA filers who use the IRS DRT.</p> <p>20. No Change.</p> <p>21. No Change. The updates that are included in each year's application release take a considerable amount of input and effort by a large number of parties to define the requirements, ensure the accuracy of the functionality, develop the system, test the system and resolve any issues, apply security protocols, and obtain clearance from the Office of</p>

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	<p>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. While the FAFSA4caster does not currently collect personally identifiable information, users could have the option to provide their IRS data or to use the current process, and the DRT would not have to retain any of the information shared. 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 begin the FAFSA application itself.</p> <p>21. Comment Process We continue to urge the Department to release draft FOTW materials at the same time as the draft paper FAFSA and to encourage public review of the FOTW 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 continue to recommend that the Department provide at least screenshots, if not a demo site, for future planned enhancements to FOTW, including the IRS DRT features, to facilitate public input before they are finalized. Including DRT-related messages and screenshots in the FAFSA Application Enhancements Summary that it issues during the annual comment period would allow commenters to review and provide input on this important tool.</p> <p>We understand that updating FOTW is a substantial undertaking. Per the Federal Student Aid Resources for the 2017-18 FAFSA® the 17-18 FOTW Preview Presentation will not be available until 9/15/16. Given that</p>		<p>Management and Budget. Because of the extensive amount of time needed to complete all of these activities, the date on which the application is currently provided via the <i>FAFSA on the Web</i> Demo site is the earliest that it is possible.</p>

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	<p>the FOTW is the “primary entry point for tens of millions of students who apply for Federal, State, and institutional financial aid” with more than 99% of FAFSAs expected to be filed online,we continue to urge the Department to make a preview version of 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. Moreover, they do not provide the text used to determine IRS Data Retrieval Tool eligibility or the responses received by applicants. Instead, a dynamic Data Elements Justification chart could include links to static images with the actual text that applicants receive.</p> <p>Back to comment 45.1</p>		
46	<p>Alabama Possible comments on 2017 – 2018 FAFSA</p> <p>1. Question 53 is often met with confusion by students who do not understand if the question is asking whether they meet the criteria before or after they turned aged thirteen. Additionally, students often misread or overlook components of the question because there are so many. Breaking the question down into multiple questions will likely reduce incorrect responses. Proposed language:</p> <p>a. At any time after you turned aged 13, were both your parents deceased?</p> <p>b. At any time after you turned aged 13, were you in foster care?</p> <p>c. At any time after you turned aged 13, were you a</p>	Ashleigh Staples Alabama Possible	<p>1. No Change. The Department of Education believes that the question and the related help topics and <i>Free Application for Federal Student Aid</i> (FAFSA®) Notes provide adequate guidance.</p>

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	<p>dependent? d. At any time after you turned aged 13, were you a ward of the court?</p> <p>2. Question 55 is also unclear for students. Proposed language: a. Does someone who is not your parent or stepparent have legal guardianship of you, as determined by a court in your state of legal residence?</p> <p>Many students file their FAFSAs electronically. Though we have been given a draft of the paper form of the 2017 – 2018 FAFSA to make comments on, I would like to comment on features of the online FAFSA form.</p> <p>3. a. The first is the option to sign into a FAFSA without an FSA ID. If it is easiest for students and parents to sign their FAFSA with an FSA ID, and the Department of Education is encouraging that—then there should not be an option for students to log in to their FAFSA without and FSA ID. Our organization has found that without guidance, many students complete the FAFSA without an FSA ID, and once they get to the “Sign and Submit” page, they select “Submit without signatures.” They often do this because they don’t understand what the FSA ID is or they do not want to go through the lengthy process of creating one. At this point most students do not realize that their FAFSA is not complete, and they do not check their emails or read them carefully enough to know that they need to submit a signature page or log back in to sign their FAFSA with an FSA ID. The options to proceed through the FAFSA filing process—but not complete it—without an FSA ID, are more burdensome to first generations, low income, and</p>		<p>2. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>3. No Change. Only the student should use the student’s FSA ID. Since a parent or preparer might be completing parts of the FAFSA on the student’s behalf, there must be a login method that doesn’t require entry of the student’s FSA ID. In addition, not all students can obtain an FSA ID (for example, those from one of the Freely Associated States, because they do not have a Social Security Number).</p>

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	<p>minority college students than helpful.</p> <p>4. b. The order of steps on the online form creates confusion for students and parents. The transition from student demographics, to parent demographics and financial information, and then to student financial information is not intuitive for students who are filing their FAFSA electronically. We propose that student financial questions immediately follow the student demographic and dependency questions; thereafter, should be the parent demographic and financial questions.</p> <p>5. c. On the dependency determination page, the option: "I am unable to provide parental information" should be reworded. Students who begin their FAFSA, but do not have their parent's information at that moment, often select that option and sometimes incorrectly submit the FAFSA without providing parental information. Proposed language: "I will not be able to provide parental information now or at a later time."</p> <p>6. We applaud the move to use prior-prior year tax information on the FAFSA. This will greatly improve the likelihood of parents providing information for their student's FAFSA in a timely manner.</p> <p>Back to comment 46.1</p>		<p>4. No Change. In order to determine whether a dependent applicant qualifies for an Automatic Zero (auto zero) EFC, the parent financial information must first be entered. If the dependent applicant qualifies for an auto zero EFC, then the parent is given the option to skip the remaining parental financial questions, as well as all student financial questions. If the order were changed, low-income families would be required to answer unnecessary questions, thereby increasing complexity and overall burden.</p> <p>5. No Change. The Department of Education believes the guidance provided is adequate.</p> <p>6. Thank you for the comment.</p>
47	<p>Section 6 of the most recent draft 2017-2018 FAFSA still states state student grant agencies will NOT receive the list of colleges. I recommend you amend the verbiage to make this crystal clear for all parties involved. Current verbiage: "All of the information you included on your</p>	<p>Becky Kilpatrick Kentucky Higher Education Assistance Authority</p>	<p>Refer to comment #3 for resolution.</p>

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	<p>FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list as well as your state student grant agency. It does not matter in what order you list your selected schools." Suggested new verbiage: "The colleges you select will receive all of your FAFSA information except the list of colleges. Your state student grant agency will receive all of your FAFSA information including your college choices. It does not matter what order you list your selected colleges."</p>		
48	<p>The IRS Data Retrieval does not allow parents who filed with ITIN numbers instead of SS# to retrieve information. A tax transcript can be ordered on the IRS website with the ITIN number so it seems it could be easily added for Data Retrieval. Also if neither parent has a SS# but answer that they filed a tax return an error message pops up that often causes the parent and student to stop and not know how to correct it. This error message should not be in the program since parents can file with ITIN. Maybe it would make sense to allow them to use ITIN instead of SS# of 000-00-0000 so the error wouldn't pop up and FSA ID would be possible as well as Data Retrieval.</p>	<p>Robbie Stabeno Waco Foundation</p>	<p>No Change. Currently the Individual Taxpayer Identification Number (ITIN) is explicitly used for IRS tax purposes, and may not be used for any other purpose (therefore, not for purposes of filing the <i>Free Application for Federal Student Aid (FAFSA®)</i>). The Department of Education will continue its collaboration with the Internal Revenue Service (IRS) to explore ways in which to further enhance the IRS Data Retrieval Tool.</p>
49	<p>Attached are a compilation of feedback from college advisors and nonprofits from Dallas County and Texas.</p> <p>Long parent signature page processing time</p> <p>Undocumented parents and parents who become frustrated with the FSA ID process are sending in physical signature pages and experiencing one to two-month-long processing times. In the past signature pages would only take a couple of weeks to be processed. A FAFSA is</p>	<p>Sarah Jensen The Commit! Partnership Dallas, TX</p> <p>Princeton Review (Dallas, TX) Academic Success Program (Dallas/Fort Worth, TX)</p>	

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	<p>incomplete without the parent signature and a parent signature is required for every correction made.</p> <p>Texas programs are using paper signature forms at significantly higher rates than in the past. NCAN confirms that they are hearing similar reports from across the country.</p> <p>1. Reduce processing time for parent signature pages.</p> <p>2. Offer method of scanning and uploading signed page to FAFSA website.</p> <p>3. Allow parents with ITIN to receive a variation of an FSA ID and sign electronically.</p> <p>4. Offer option to sign electronically using mouse/track pad</p> <p>Long IRS tax transcript request processing time</p> <p>Undocumented students and students selected for verification are required to submit an IRS tax transcript. Families have to be coached on how to request the tax</p>	<p>Dallas ISD (district, counselors, advisors) Uplift Education Charter Network (advisor) Admissions Aid (Dallas, TX) RGV Focus (Rio Grande Valley, Texas) Grand Prairie ISD (advisors) Trinity River Mission (advisors) Education Service Center – Region 19 (El Paso, TX) College Forward (Austin, TX)</p>	<p>1. Earlier this year, the Department of Education observed an increase in signature pages resulting from a decrease in the number of parents and students signing the FAFSA electronically. The Department will continue to monitor the signature page process and make adjustments as necessary.</p> <p>2. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>3. No Change. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>4. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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	<p>transcript and, once requested, processing time to receive the tax transcripts is long. Students are not able to receive financial aid packages until completing the verification process.</p> <p>5. Create an option to order an IRS tax transcript when students submit the FAFSA.</p> <p>6. Allow electronic delivery of tax transcripts, to speed timing.</p> <p>Confirmation email is misleading.</p> <p>The confirmation email students receive makes it seem like they are done with the process even if the student isn't. They get the email even if they don't include parent signatures or don't use the IRS data retrieval tool.</p> <p>7. Change the language of confirmation email to make it clear the student is missing information before their application is complete.</p> <p>Error message when reporting taxes with an ITIN instead of a SSN</p> <p>8. If the parent has filed taxes but doesn't have a SSN, they receive an error message on the FAFSA asking if it was a foreign tax return. It doesn't stop them from</p>		<p>5. No Change. The IRS Data Retrieval Tool (IRS DRT) is available for applicants and parents to transfer their tax information into the <i>Free Application for Federal Student Aid (FAFSA®)</i> if they are eligible to do so. If the applicant or parent does not use the IRS DRT and the student's FAFSA is selected for verification, the school should provide information about how to complete verification, including whether the student or parent must submit a tax transcript and if so, how to obtain one.</p> <p>6. The IRS tax transcript process is not managed by the Department of Education.</p> <p>7. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>8. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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	<p>submitting, but it confuses families. We know they were able to submit because while they may not have a SSN they have an ITIN.</p> <p>9. Change wording in message to ask, "Your parents don't have a SSN but you indicated they filed taxes. Was this a foreign tax or did they file using an ITIN?"</p> <p>Burdensome FSA ID Process</p> <p>Most students and parents don't check their email unless they absolutely have to, so students frequently forget their email user name and password. Students get highly discouraged and annoyed by having to create a new email or regain access to an existing one, then creating an FSA ID, and then filling out the FAFSA. It takes so much longer than it should.</p> <p>Creating an FSA ID for parents is equally challenging. Most don't have email addresses and their access to and familiarity with the Internet is limited in general. The FAFSA itself is simple, but the process leading up to starting the form makes it seem lengthier than it actually is. Families feel discouraged and don't always see the process through.</p> <p>If an unauthorized person already has access to the sensitive information required for the FAFSA, FSA IDs and PINs don't make the process more secure. On the contrary, creating a fake email would enable that unauthorized person to use someone else's personal data, and then the personal data would be linked to an email that didn't belong to the authorized person.</p>		<p>9. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>10. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct</p>

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	<p>10. Allow two IDs per email address</p> <p>11. Eliminate the 30 minute wait time when changing or retrieving passwords when using challenge questions</p> <p>12. Set default to show all text when typing in answers (click to make it hidden instead of reverse)</p> <p>13. Reduce the number of challenge questions to three and offer challenge questions that are widely relevant, culturally sensitive, and relevant to our times</p> <p>14. Eliminate significant date question</p> <p>15. Provide a secure texting opt in addition to or in place of a secure email option</p> <p>Overly difficult to make SSN corrections on the FAFSA</p> <p>The FAFSA process is often the first time a student uses their SSN on an application and mistakes with the number and names matching social security cards are common. If they log in with their FSA ID and the SSN has been submitted incorrectly they won't be able to change it on their FAFSA. Or if they log in with</p>		<p>additional research.</p> <p>11. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>12. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>13. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>14. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>15. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p>

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	<p>their name, DOB, and incorrect SSN it can't be changed on the FAFSA form even before submitting. Students have to create an entirely new application or submit paperwork that can take months to update.</p> <p>16. Enable a secure way for students to correct their SSN on their FAFSA application before it is locked in.</p> <p>High school names are not standardized</p> <p>We rely on the public ED FAFSA data to track our progress. Students that submit a FAFSA without entering a high school (or realizing they need to click confirm) are not included in the count. Additionally, students may not enter their formal high school name, which causes our data to be skewed. For example a student putting in Townview Magnet center instead of Science and Engineering Magnet at Townview or Talented and Gifted at Townview.</p> <p>17. Make entering high school name mandatory to continue on with the application. Use state campus identification numbers to standardize the drop down menu when students begin typing in their high school name.</p> <p>Verification process varies widely from college to college</p> <p>Students often don't know or don't find out until late in the process that they've been selected for verification and don't know what it means. They are even less likely to</p>		<p>16. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>17. No Change. A response to FAFSA Question #27 is required in <i>FAFSA on the Web (FOTW®)</i> for all applicants who indicate they have or will receive a high school diploma.</p>

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	<p>know what a tax transcript is or how to request one. For the most part, our low-income parents and students don't use email in the same way or with the same frequency as the rest of us (if at all). Even if a student has an email address for social media or college applications, it is likely filled with thousands of unread messages, so they miss valuable information. (For example, if a student types in their SSN incorrectly when making an FSA ID, they get a message at an email they don't use, and they continue to experience problems with the submission of their FAFSA.) For many campuses with a large portion of low-income students, more than half of a senior class is selected for verification even if they used the IRS data retrieval tool. Additionally, each college requests widely different items for the same student.</p> <p>18. Create an option to receive a text notification in addition to email when selected for verification;</p> <p>19. Increase requirements of colleges and universities to communicate information to low-income students who may not have easy access to email or phone, may change mailing addresses frequently, and have little awareness of the process in general.</p> <p>Return to comment 49.1</p>		<p>18. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>19. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research</p>
50	The draft 2017-18 FAFSA has instructions in Step Six stating that the Department will not share the student's school list, in any order, with state agencies. The	Anna Griswold, Pennsylvania State University	Refer to comment #3 for resolution.

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	<p>instructions further suggest to students that the order in which they list schools does not matter.</p> <p>This is a significant change from prior guidance issued by the Department in the Electronic Announcements of November 12, 2015 and January 8, 2016. Both announcements indicate that state grant agencies will continue to receive the full list of colleges listed by the student on the FAFSA, though the January announcement also states that, “beginning with the 2017-2018 FAFSA, that listing will no longer be provided in the order in which the student listed the schools, but rather in a random order”.</p> <p>The Pennsylvania Higher Education Assistance Agency (PHEAA) is our state grant agency, and I share PHEAA’s concerns about the wording of the 2017-18 FAFSA. If the Department does not share the student’s FAFSA school list, in the order provided by the student, with state grant agencies, the financial aid application will be needlessly complicated, student awareness of state grant eligibility will be decreased, and state grant agencies will be forced to expend scarce dollars on system changes that could otherwise be devoted to state grant aid for students. All of these consequences are in direct conflict with simplification and will negatively impact higher education access, affordability, and completion.</p> <p>We understand masking the other schools a student lists when sending records to each school the student has requested to receive their FAFSA. We agree that revealing all the schools that a student may be considering for enrollment can be used for competitive advantage by some schools for recruiting students, and that is not an</p>		

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	<p>appropriate use of the FAFSA. However, state grant agencies are not in the business of recruiting students and their need to see all the schools listed, in the order listed is intended to establish eligibility and grant award values for state grant applicants.</p> <p>Please reconsider this proposed change and allow states to receive the exact list of schools as indicated by the student. Below is a recommendation of revised language for the 2017-18 FAFSA Step Six instructions:</p> <p>“Enter the six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-800-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. 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 2.”</p> <p>Thank you for this opportunity to express my concerns and explain the importance of the school list order to the Pennsylvania State Grant Program. If you have questions or need additional information, please feel free to contact me at amg5@psu.edu.</p>		
51	<p>I had previously sent in comments, but had a few more comments to add to the list.</p> <p>1. # 28 student marks No, #29 they mark that they are a graduate student, but then in #30 states that they are</p>	Mary Gerardy, North Dakota State University	1. No Change. <i>FAFSA on the Web</i> (FOTW®) has edits that display when an applicant enters conflicting responses for Question #28 (first bachelor’s

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	<p>working on their first bachelors. # 28 student marks No, #29 they mark that they are a graduate student, but then in #48 say No to working on masters, doctorate, or graduate certificate. In either situation this should be a stop edit where they can't move on until they correct #29 as it's conflicting information.</p> <p>2. It also wouldn't hurt to clarify that a graduate student does NOT mean that you have graduated from high school.</p> <p>3. #38 If you filed taxes and claimed yourself as an exemption, and your parent's didn't include you as an exemption on their tax return, this does not mean you are independent. Please see Step Three questions #46-58 to see if you are truly independent.</p> <p>4. #43 & 92 Make family farm and business stand out more. #44d & 93d should state "that you reported as income on your tax return", not just that you included in your AGI as some people don't know what AGI is.</p> <p>5. #45 & 94 Bold statement to NOT include SSI as untaxed income. Thank you.</p>		<p>degree?) and #48 (master's or doctorate degree?). Question #30 (degree or certificate?) is an eligibility status question that does not require editing against the other two questions.</p> <p>2. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>3. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>4. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>5. No Change. To bold this statement could give the impression that the other statements in these instructions are not as important.</p>
52	<p>Overall, there needs to be continued effort to clarify questions to help reduce conflicting information and the necessity for corrections. Details are provided below for some of the questions that tend to cause the most confusion and conflicting information for students.</p> <p>1. In the "Filling Out the FAFSA" section notes, change "... complete this form to the extent you can and submit it as instructed." to "provide all requested information and</p>	Anonymous	<p>1. No Change. The Department of Education believes the instructions provide adequate guidance.</p>

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	<p>submit it as instructed.” They are being instructed to contact the financial aid office of the school they are attending and that is where the decisions and changes need to be made. Submitting partial or incorrect information based on their own estimates only increases the chances for additional documentation being required and conflicting information.</p> <p>2. Question 28: Change wording from “Will you have your first bachelor’s degree before you begin the 2017-2018 school year?” to “Will you have completed the requirements for your first bachelor’s degree before you begin the 2017-2018 school year?”</p> <p>3. Question 32 and Question 80: Either remove the “Will File” option since the vast majority of students and parents would have had to complete their tax filing prior to the FAFSA becoming available. Or add verbiage that indicates “Only valid if an extension request was filed and granted with the IRS.”</p> <p>4. Question 48: Change wording from “At the beginning of the 2017-2018 school year, will you be working on a master’s or doctorate program...” to “At the beginning of the 2017-2018 school year, will you be admitted to and participating in a master’s or doctorate program...”</p> <p>5. Question 59: After “As of today, what is the marital status of your legal parents?” add notation that does not require clicking for additional notes that states clearly that ‘legal parents’ are not just ‘biological parents’. It needs to be clear up front that ‘parents’ means biological, adoptive, AND stepparents. This should also be reiterated after the question “What are the SSNs, names</p>		<p>2. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>3. Refer to comment #9 for resolution.</p> <p>4. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>5. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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	and dates of birth of the parents reporting information on this form?" For example, biological parent and step-parent, adoptive parents, etc.		
53	For FAFSA on the Web (FOTW): When students enter their high school information, it should NOT allow the student to just type in whatever name they think their high school goes by and be able to click on NEXT. The CONFIRM button is often times skipped & it should be a mandatory click/step for anyone submitting a FAFSA. Gray out the NEXT button until they click on CONFIRM and select the correct high school code/name. This will save a lot of time/corrections and award students sooner if its mandatory the first time around. Many students don't know the "official" name of their high school. For example, schools could have "Senior" or "SR" in their official high school name, but that's not what students know/go by.	Anonymous	No Change. Not all high school names are included in the <i>FAFSA on the Web</i> (FOTW®) database. The high school data is maintained by the National Center for Education Statistics (NCES); if a high school does not report their information to NCES then it does not appear in the FOTW database.
54	<p>On behalf of the more than 3,000 member institutions of the National Association of Student Financial Aid Administrators (NASFAA), I am writing to offer our comments on the draft 2017-18 Free Application for Federal Student Aid (FAFSA).</p> <p>We appreciate and applaud the administration's decision to implement the use of prior-prior year (PPY) income data in the application process for the 2017-18 award year. NASFAA convened a PPY implementation task force in 2015 to focus on aiding a smooth implementation and developing suggested solutions to share with the Department of Education (ED) to proactively address any unexpected challenges. The following FAFSA changes would not only improve the FAFSA but also continue to pave the way for a successful PPY transition.</p>	NASFAA	

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	<p>Enhance the use of the Internal Revenue Service's Data Retrieval Tool (IRS-DRT)</p> <p>The move to PPY will increase the number of applicants who are able to utilize the IRSDRT, which is a key component in FAFSA simplification efforts and burden reduction. We encourage ED to continue its collaboration with the IRS, specifically exploring the following issues:</p> <ol style="list-style-type: none"> 1. Allow more tax filers to use the IRS-DRT. For example, allow applicants and parents who file separate returns to use the IRS-DRT by pulling the tax information by SSN and combining the data on the appropriate FAFSA questions. If we do not expand the use of DRT, some of the benefits of moving to PPY will be blunted. 2. Confirm for the student, parent or spouse that there is no record of a tax return on file, rather than forcing the applicant to obtain this information from the IRS. Currently, students and/or parents who do not file a tax return may be required to provide documentation of such status. The IRS filing deadline for PPY is more than a year before the FAFSA becomes available, and providing this information via the IRS-DRT would reduce administrative burden for both students and schools. 3. Make the IRS-DRT authentication process more lenient, while still retaining necessary information security. For example, the current process requires tax filers to input the exact address from their tax returns in order to retrieve IRS data. Students may move from year to year, and they find it difficult to remember their exact prior-year tax filing address, let alone the address needed for 		<ol style="list-style-type: none"> 1. The Department of Education continues to explore ways to increase the number of applicants and parents who can use the IRS Data Retrieval Tool (IRS DRT) to transfer tax information that correctly answers questions on the <i>Free Application for Federal Student Aid</i> (FAFSA®). 2. Refer to comment #54.1 for resolution. 3. No Change. IRS DRT authentication requirements adhere to IRS security regulations. However, the Department of Education has worked collaboratively with the IRS to address confusion about authentication errors on the part of students and parents attempting to use the IRS DRT. As a result, the IRS currently displays specific guidance to IRS DRT users who are unable to successfully authenticate with the IRS due to an address mismatch.

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	<p>PPY data retrieval. Explore other authentication factors besides address that could be used, or perhaps lessen the address requirements.</p> <p>4. Explore the possibility of expanding the IRS-DRT to allow for the import of all relevant line items from IRS tax returns and W-2 forms. With the implementation of PPY, IRS systems should be up-to-date with the required information available to retrieve via the IRS-DRT. This would allow for a more comprehensive streamlining of the entire application process.</p> <p>5. Earlier release of Pell payment and disbursement schedules</p> <p>NASFAA commends ED's efforts to shift its release timeframe for crucial information like the "FAFSA on the Web" preview site in preparation for early FAFSA. This March, Undersecretary Mitchell sent a letter to college and university presidents asking them to take advantage of the early FAFSA availability by providing earlier notification of financial aid eligibility to families. We recognize the benefit of giving families more time to make informed decisions about postsecondary enrollment. However, the release of Pell Grant payment and disbursement schedules (or "Pell tables") in late January forces financial aid offices to either maintain the current practice of making financial aid awards in the spring or release earlier award letters based only on estimated Pell Grant amounts. These estimated awards may require subsequent revisions, complicating a financial aid process that PPY was implemented to simplify. While recognizing that ED is limited by statute and by Congress in the timing</p>		<p>4. No Change. The Department of Education believes all relevant line items that are necessary for an Expected Family Contribution (EFC) calculation and accessible from the IRS are already collected. To transfer more data would require a change to the IRS DRT relationship and add questions to the <i>Free Application for Federal Student Aid (FAFSA)</i>.</p> <p>5. No Change. The Department of Education's authority to publish the Federal Pell Grant payment and disbursement schedules earlier than February is limited by statutory authority.</p>

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	<p>of Pell table availability, making Pell tables available in the fall would allow institutions to release early award notices with accurate information for students and families.</p> <p>6. The Department should explore how it can lift or modify any limitations requiring the use of December's Bureau of Labor Statistics (BLS) Unadjusted 12-month Consumer Price Index for All Urban Consumers (CPI-U) for the inflation adjustment add-on to Pell. The BLS issues the 12-month CPI-U every month and changing the required month from December to an earlier month would facilitate earlier release of Pell tables.</p> <p>Other recommendations</p> <p>Addition of Medicaid to means-tested benefits for simplified EFC calculation</p> <p>7. NASFAA supports the addition of Medicaid as a qualifying means-tested program for the simplified and automatic zero EFC formulas. NASFAA's FAFSA Working Group published its results in 2015 urging ED to reduce application burden for the neediest applicants, many of whom have already been determined to qualify for other federal means-tested benefit programs. Expanding the number of means-tested benefits that qualify applicants to complete a simplified FAFSA is a positive step in the direction the Working Group recommended. Further, we would like to see eligibility for means-tested benefits used as the sole criterion for automatic zero EFC, eliminating all income and asset questions on the FAFSA for this group.</p> <p>8. Student Aid Report</p>		<p>6. Refer to comment #54.5 for resolution.</p> <p>7. No Change. The Department of Education's authority to make the recommended change to use eligibility for Means-Tested Benefits as the sole criterion for automatic zero EFC is limited by statute.</p> <p>8. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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	<p>In recent years, the aid community has been focused on improving the FAFSA itself. It is now time for us to improve the Student Aid Report (SAR), which has long been overlooked as a key communication tool in the financial aid process. We are sure any rudimentary consumer testing would show that the layout, readability, and general user-friendliness are all in need of a complete overhaul. We urge ED to reconsider our previous requests to improve the SAR.</p> <p>9. School listing and order to state grant agencies and schools</p> <p>Many state grant agencies rely on the school listing as well as the order schools are listed on the FAFSA to estimate appropriations to fund annual grant demand as well as to provide students with estimates of state grant eligibility. NASFAA supports state grant agencies' request to continue to receive both the school listing and the order in which students listed schools in order to facilitate state grant processing. FAFSA language would need to be updated to reflect that state agencies would receive both the school listing and order.</p>		<p>9. Refer to comment #3 for resolution</p>
55	<p>1. A number of State Grant Agencies use the Applicant Interface (API) to connect their state grant application to the FAFSA. Information on this capability is provided to the student at the beginning of the application process and is often forgotten by the time the student reaches the Confirmation page.</p> <p>It would be beneficial to improve the language at the</p>	Christine Zuzack, Pennsylvania Higher Education Assistance Agency	<p>1. No Change. Current messaging on the <i>FAFSA on the Web</i> (FOTW®) “Student Demographics” page states “You are eligible to transfer your FAFSA information into <State Name>’s state student aid application. Use the Start your state application link on the FAFSA confirmation page to transfer your information.</p> <p>Note: This feature is only displayed once on the confirmation page after submitting your FAFSA.” The Department of Education believes the current messaging is adequate.</p>

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	<p>beginning of the FAFSA.</p> <p>Suggested text includes the following:</p> <p>Please remember to look for the Start your State Grant application link at the end of the FAFSA on the Confirmation Page. You can click this to complete your State Grant application for (State's Name).</p> <p>Or</p> <p>You are eligible to transfer your FAFSA information into (State's Name) State Student Grant Application upon completion of filling out the FAFSA. Use the Start your State Grant Application link found on the last page of the FAFSA, the confirmation page, to easily transfer your information.</p> <p>2. Additionally, better highlighting the link on the Confirmation page may draw more student attention to this link and improve its utilization.</p>		<p>2. No Change. The link and associated text display near the top of the confirmation page, preceded by an orange arrow graphic to draw the applicant's attention. The Department of Education believes this is adequate.</p>
56	<p>1. The flow of the online FAFSA is in different order than the paper FAFSA, and also different from the SAR. For example, in the PDF document, Step 2 collects student income, yet the online FAFSA collects dependency questions first, and then Parent income and then students income. It would be more consistent if the SAR matched the online FAFSA.</p> <p>2. It would be helpful for students and families if they were able to utilize the DRT for parents who file "married, filing separately."</p>	Anonymous	<p>1. No Change. <i>FAFSA on the Web</i> (FOTW®) uses technology to provide a simplified application experience. This simplified experience is achieved via skip logic, pre-filling of certain questions based on the responses to other question, and real-time editing. Questions are asked in a particular order to allow for the minimum number of questions to display. The paper FAFSA cannot use the same logic, so questions are ordered to flow in a logical way for applicants who can't benefit from the online experience.</p> <p>2. Refer to comment #54.1 for resolution.</p>

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	<p>3. Additionally, question 59 inquiring about parental marital status prevents a students from using DRT and reporting they type of return filed if it's different for two parents. For example, a students whose parents were never married, but live together, one files Single, the other files head of household, the student must pick a parent to answer this question for. Using DRT for both parents in such case would be helpful for the verification process.</p>		<p>3. Refer to comment #54.1 for resolution.</p>
57	<p>The draft 2017-18 FAFSA released March 29, has instructions in Step Six stating that the Department will not share the student's school list (in any order) with state agencies, and further suggesting to students that the order in which they list schools does not matter - a significant change from the prior guidance. Department staff have indicated that, despite the proposed instructions in Step Six of the FAFSA, the school list will continue to be shared with the states. This information is not reassuring, since that is not what the proposed FAFSA language says. In fact, it is even more confusing to see that students will be told their list of schools will not be shared with the states, if that is not the case. The bottom line is that Department's proposed change to discontinue sharing the student's FAFSA school list, in the order provided by the students, with state student grant agencies will needlessly complicate the financial aid application process, decrease student awareness of state grant eligibility, and force state grant agencies to expend scarce dollars on system changes that could otherwise have been devoted to state student grant aid. This planned change to not show state agencies the students list of schools is in direct conflict with the simplification</p>	Anonymous	<p>Refer to comment #3 for resolution.</p>

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	<p>goal. Students and families will NOT understand why state agencies do not have access to the list of schools they put on their FAFSA. Please reconsider this change and allow states to receive the exact list of schools as indicated by the student. Here is a recommendation of revised language for the 2017-18 FAFSA instructions: Enter the six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-500-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. 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 2.</p>		
58	<p>As a comprehensive agency offering a wide array of programs and services, ISAC administers the Monetary Award Program (MAP) Grant – one of the largest state grant programs in the nation – along with several other state need- and merit-based programs. The FAFSA is used as the application for the MAP Grant, and as such, ISAC is interested in the development of the document. We appreciate the Department's efforts to consult with state partners on revisions to the FAFSA so that it may continue to be used for the processing of state awards.</p> <p>In past academic years, ISAC, as a state agency, has been provided with Institutional Student Information Reports (ISIRs) that include school information in the order listed by the student. While it has been noted by Department officials that this practice will remain in place for the 2017-18 FAFSA cycle, randomizing the student's list of schools in</p>	Illinois Student Assistance Commission	Refer to comment #3 for resolution.

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	<p>future years will have serious negative consequences for Illinois' Monetary Award Program (MAP.) First-choice schools are a necessary component for projecting MAP claims and its recipients, and accurately projecting claims is critical to administering the program. A reasonable claims projection is particularly important in choosing a "suspense date."</p> <p>Since MAP funding is insufficient for all eligible applicants, a "suspense date" must be set each year when projections indicate the expected appropriation will be claimed by the current pool of applicants. Awards for applications received on or after that date are suspended. MAP award amounts vary depending on tuition and fees -- the average award amount at a community college is about one-third the value of a private school award -- so knowing which school the applicant is likely to attend is critical to the forecasting. Nearly 84 percent of MAP recipients attend the school listed first on their FAFSA.</p> <p>If school choices are received in a randomized order, it will be difficult to determine which award amount, and which claim rates to use in projections. To avoid overspending the appropriation, it will be necessary to error on the high side, resulting in even earlier initial suspense dates. Earlier suspense dates increase uncertainty for more students, making it unclear whether or not they will be able to claim a MAP award.</p> <p>An alternate approach would be for Illinois to require an additional application from the student to provide the needed information. An additional application would be another barrier to entry for students who already face</p>		

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	<p>great challenges to enrolling in college. Both scenarios seem to be in direct opposition to the goals of increasing access and simplifying the aid application process.</p> <p>ISAC recommends the Department continue to provide state agencies the list of schools on the ISIR in the order listed by the student beyond the 2017-18 FAFSA cycle. ISAC recommends retaining the current language contained in the instructions for Step Six of the FAFSA, which reads:</p> <p>“All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you listed. In addition, all of your FAFSA information, including the list of colleges, will be sent to your state student grant agency. 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.”</p> <p>The National Association of State Student Grant & Aid Program (NASSGAP) has made numerous comments on these issues, and as a member of NASSGAP, ISAC supports NASSGAP’s position.</p>		
59	<p>1. To improve accuracy, I would like to see a wizard-like approach implemented for two parts of the FAFSA. The first would pertain to the student’s year level. Currently, there are several questions about year level and the student is able to submit the application with conflicting answers. This creates issues at the school level – for example, possibly paying a Pell grant to an ineligible student or not paying a Pell grant to an eligible student.</p>	Christine Auman	<p>1. No Change. The Department of Education believes that the current question is clear. Schools have responsibility to verify the student’s grade level prior to paying a Federal Pell Grant.</p>

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	<p>1. Have you ever attended college? o If the student selects No: <input type="checkbox"/> Automatically updates “will you have a bachelor’s degree by July 1” to “No” <input type="checkbox"/> Updates the list options in the “what degree are your working on” to only a 1st BA or Associates Degree <input type="checkbox"/> Automatically updates “Are you working in a graduate degree” to “No” in the dependency section o If the student selects Yes: <input type="checkbox"/> Present the user with the following series of questions with edit checks so the answers must align: <input type="checkbox"/> Will you have your first bachelor’s degree by July 1, 20XX? o If no, update the options for “what degree are you working on” to exclude any graduate work <input type="checkbox"/> What degree are you working on? <input type="checkbox"/> Are you a graduate student o This should be automatically updated based on the user’s answers to the above questions. <input type="checkbox"/> If the user says they are working on a bachelor’s degree and also says “yes” that they are a graduate student, require them to correct their answers.</p> <p>2. Another area where our school finds a lot of reporting errors is for parent data. In particular, if a student’s biological parents were never married and the custodial parent later remarries, the student will answer the parent marital status based on their biological parents marital status – never married, rather than “remarried”. If the questions could be modeled after the “Who’s My Parent When I Fill out the FAFSA” pictograph, I think accuracy may improve, https://studentaid.ed.gov/sa/sites/default/files/who-is-my-parent.png.</p>		<p>2. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>
60	1. We recommend that when a student or parent selects	Worth Ferguson	1. No Change. The Department of Education needs to further assess the

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	<p>that they filed a Foreign Return, they should not be asked to select a tax filing status. The tax filing process varies greatly worldwide and we have found that foreign return filers select the Head of Household filing status in error at a much higher rate than other individuals. And, in most cases when we collect documentation to resolve conflicts, we learn that they did file their foreign return with the appropriate status in that country. We are often reminded that financial aid professionals are not expected to be tax experts, but are increasingly asked to be vigilant for errors on U.S. returns. Now, we find ourselves deciphering foreign returns to determine if they were filed correctly. We recommend that the tax filing status question not be presented to foreign return filers and that the marital and tax filing status conflict comment code not be applied to these ISIRs.</p> <p>2. We recommend separating divorced and widowed in to individual selections under Student marital status. This will make it significantly easier for schools to determine if a marital and tax filing status conflict exists.</p> <p>3. Additional instructions are needed for questions 44c, 44d, 93c, and 93d clarify when work study earnings and scholarship/grant aid should be reported. Students and parents misreport amounts in these fields at a high rate, which then complicates the verification process. For 44d and 93d, instructions should be added that include the labeling of scholarship/grant aid included on the wages line of a return with "SCH".</p> <p>4. The question that asks students and parents if they amended their return still seems to be an issue. We are</p>	<p>Texas A & M University</p>	<p>impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>2. No change. When an applicant indicates he/she is widowed or divorced, he/she should only report his/her own income information on the FAFSA. In both cases, a potential conflict exists when the tax filing status is married filed jointly, since a jointly filed tax return may include income for the former spouse.</p> <p>3. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>4. Refer to comment #2.2 for response.</p>

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	<p>having to collect a large number of signed statements from filers confirming they did not amend and answered the question in error.</p>		
61	<p>1. The National College Access Network (NCAN) applauds the move to using prior prior income year data for the 2017-18 FAFSA form and its availability in October instead of January. This change will provide great benefits for students as they can now enter their college search knowing their likely federal financial aid eligibility. In addition, more families will be able to use the IRS Data Retrieval Tool, decreasing FAFSA completion time and the likelihood of being selected for verification. With these changes, even more can be done to simplify the process of applying for Federal Student Aid, both as part of the FAFSA and for the verification process. Outlined below you will find proposed changes NCAN supports as well as recommendations for further improvement. Thank you for this important opportunity to suggest advancements for students.</p> <p>The following changes to the FAFSA for 2017-18 are all improvements for NCAN's population of low-income, first generation students and students of color access to federal financial aid:</p> <p>2. a. The move to "Early FAFSA" allowing for both the use of prior prior year income data for financial questions and moving the application availability date from January 1 to October 1 of the previous year will both help students more accurately and quickly complete the FAFSA as well as gain more time to explore their college options.</p> <p>3. b. On question 97, adding Medicaid recipients to the</p>	<p>Kim Cook, Executive Director, NCAN</p>	<p>1. Thank you for the comment.</p> <p>2. Thank you for the comment.</p> <p>3. Thank you for the comment.</p>

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	<p>group of students who qualify for the simplified needs test will allow another group of students who have already demonstrated their need to have a streamlined pathway through the FAFSA form.</p> <p>4. c. United States Digital Services and Federal Student Aid partnership to review and streamline the FSA ID process will simplify the completion process. The current process is burdensome to students and NCAN encourages these two agencies to work together to improve it.</p> <p>5. d. On the related topic of FAFSA verification, the April 1, 2016 Federal Registrar (Vol 83, No 63), states that students will no longer need to verify how they live on a very low income, the receipt of SNAP, or that they made child care payments. Taking away this additional paperwork burden for students will prevent students from getting waylaid in the verification process right before the semester begins.</p> <p>2) The following changes to the FAFSA for 2017-18 are detrimental to NCAN's population of students as they increase the burden on the student to be able to access federal financial aid:</p> <p>6. a. Eliminating state student grant agency access to the school list on the FAFSA is harmful to students because it will increase their burden in applying for state financial aid. The directions under "Step Six" of the draft FAFSA state that "All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list as well as your state student grant agency." NCAN was a strong advocate of removing institutional access to the school list provided</p>		<p>4. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>5. Thank you for the comment.</p> <p>6. Refer to comment #3 for response.</p>

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	<p>on the FAFSA, however believes that the unintended consequences of removing state student grant agency access will cause far more harm than good. This change will force many state agencies to create an additional state aid form or process, and every additional step decreases the chance that a student will access financial aid and continue on with their education. The original goal of the FAFSA in 1992 was to streamline the process and remove the need for duplicate forms. While NCAN does not agree with how many state legislatures choose to distribute their state aid dollars, the agencies tasked with distributing those dollars must follow their state requirements and are aiming to do so with as little burden to students as possible. Any action that would create additional state forms would be harmful to students.</p> <p>7. b. Requiring a 4506-T causes an unnecessary and duplicative burden on students and does not provide any additional information to agencies or institutions providing financial aid. On the related topic of FAFSA verification, the April 1, 2016 Federal Registrar (Vol 83, No 63), states that: For an individual who has not filed and, under IRS or other relevant taxing authority rules is not required to file a 2015 income tax return— (1) A signed statement certifying— (a) That the individual has not filed and is not required to file a 2015 income tax return; and (b) The sources of 2015 income earned from work and the amount of income from each source;</p> <p>(2) A copy of IRS Form W-2 for each source of 2015 employment income received or an equivalent document;</p>		<p>7. The Department of Education has referred this comment to the appropriate business unit.</p>

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	<p>and</p> <p>(3) Confirmation of non-filing from the IRS or other relevant taxing authority dated on or after October 1, 2016.</p> <p>Step 3 of the above process is a new requirement which will force students to provide a 4506-T during verification to prove that they did not file taxes, rather than only the signed statement confirming that they did not file. The 4506-T form simply says that taxes were not filed, but it does not verify that taxes did not need to be filed, so the federal government, states and institutions are gaining no additional information about students while making them acquire an additional form, particularly one that cannot be quickly accessed. As it can take up to 10 business days to retrieve this form, students who are flagged for verification near the beginning of classes may not be able to retrieve it and deliver to their school in time. Further, students who were flagged for verification during the 2016-17 season, who are then flagged for verification again in 2017-18 are currently exempt from having to re-verify given the repeat of financial information. However, non-tax filers in this category would still need to provide the 4506-T because it was not requirement for the 2016-17 year. Overall, this new requirement provides undue burden on students without providing any additional information to those awarding aid.</p> <p>NCAN proposes the following suggestion to improve the FAFSA completion experience for all students and families: expand the information available and populations able to use the IRS Data Retrieval Tool to further reduce the burden of completing the FAFSA.</p>		<p>8. No Change. The Department of Education will continue its collaboration with the Internal Revenue Service (IRS) to explore ways in which to further</p>

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	<p>8. a. With the move to using prior prior year income data, NCAN strongly encourages the U.S. Department of Education to work with their partners at the Internal Revenue Services to see what additional fields could be added to the IRS Data Retrieval Tool now that taxes will be filed a full six months before the FAFSA process start. Suggestions for expansion include transferring the data for questions about financial assets from tax schedules and making information from W2s available from the DRT for families who do not need to file tax forms. Additionally, ED and IRS should also explore if it is possible to add more categories of tax filers, such as married filing separately, to those who are able to use the Data Retrieval Tool.</p> <p>9. b. With respect to the verification changes mentioned above in 2b, if additional document must be required for families who did not file taxes, NCAN supports the suggestion from the National Association of Student Financial Aid Administrators to incorporate this field into the IRS Data Retrieval Tool: i. "Confirm for the student, parent or spouse that there is no record of a tax return on file, rather than forcing the applicant to obtain this information from the IRS. Currently, students and/or parents who do not file a tax return may be required to provide documentation of such status. The IRS filing deadline for PPY is more than a year before the FAFSA becomes available, and providing this information via the IRS-DRT would reduce administrative burden for both students and schools." - NASFAA FAFSA 2017-18 Comments, 26 May 2016.</p>		<p>enhance the IRS Data Retrieval Tool.</p> <p>9. Refer to comment #54.1 for resolution.</p>
62	1. Throughout my time in the Senate, I have fought to remove educational barriers for homeless children and	Patty Murray, United States	1. This is a significant change that requires adequate time to properly implement. The Department of Education plans to make this change to

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	<p>youth. As I expressed to you in a letter earlier this year, I am particularly concerned about the serious roadblocks unaccompanied homeless students face in applying for and receiving financial aid. Removing these barriers can help more young people pursue a college degree and achieve their dreams. As you know, unaccompanied homeless youth are young people who experience homelessness while not in the physical custody of a parent or guardian. Many unaccompanied youth have experienced severe trauma, including abuse and neglect and family dysfunction. Because unaccompanied youth do not receive financial support from their parents, they do not have the necessary parental information to complete the Free Application for Federal Student Aid (FAFSA). It is critical that the Department of Education ("the Department") streamlines the path for unaccompanied homeless youth to receive the financial support they need to attend and succeed in higher education. In February, I requested that the Department align the definition of "youth" in the FAFSA with the definition under the College Cost Reduction and Access Act of 2007 (CCRAA, P.L. 110-84). I appreciate your attention to this matter and look forward to continuing to work together to address this issue in the coming year.</p> <p>2. In addition, I appreciate the Department's work in addressing many of the barriers unaccompanied homeless youth face in the most recent Application and Verification Guide (AVG) and the July 29, 2015 Dear Colleague letter (GEN-15-16). Unfortunately, the proposed 2017-18 FAFSA also contains solvable barriers to success for unaccompanied homeless youth. Instead of taking into account the strides made by the AVG and your recent Dear Colleague, the proposal instead contains harsh and</p>	<p>Senator, Washington</p>	<p>the 2018-2019 <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>2. Text in <i>FAFSA on the Web</i> (FOTW®) has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p>

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	<p>aggressive language that intimidates, instead of supports, unaccompanied homeless youth. In particular, I was concerned to see that unaccompanied homeless youth are told that all decisions are final, which would imply that they do not have the option to contact the Federal Student Aid Ombudsman with questions about their status or challenges they may face in receiving the required determinations. And, students are told to provide written documentation about their living situation – an impossibility for many, if not most, of these homeless students.</p> <p>As the Dear Colleague clearly states, if a student does not have written evidence of their situation, their financial aid administrator may make a determination about your status based on a documented interview with you. It is also important to note, as so clearly stated in the Dear Colleague, that financial aid administrators is required to make a homeless youth determination upon request. In order to ensure that all unaccompanied homeless youth have a clear path to financial support, I urge the Department to take into consideration the recommendations I have attached, which are aligned with the AVG and the Dear Colleague. Thank you for your immediate attention to this matter.</p>		
63.	<p>The U.S. Government Accountability Office (GAO) recently released a report (GAO-16-343) on the challenges and barriers affecting the ability of homeless and foster youth to pursue a college education. The report found that burdensome program rules, including extensive documentation requests, can hinder the ability of homeless and foster youth to access federal support. These findings are consistent with our direct experiences</p>	<p>NAEHCY The Advocacy Institute American School Counselor Association</p>	

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	<p>in attempting to assist homeless and foster youth access financial aid.</p> <p>Background: The FAFSA and Unaccompanied Homeless Youth</p> <p>The CCRAA established that FAFSA applicants are 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 selfsupporting, with no regard to the applicant’s age.</p> <p>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 the CCRAA’s independent student provisions should cover unaccompanied youth until they turn 24.</p> <p>On July 29, 2015, the Department of Education issued a Dear Colleague letter clarifying that, in fact, the CCRAA’s independent student provisions do cover unaccompanied youth until they turn 24. Specifically, the letter states:</p> <p>“Applicants who are between the ages of 21 and 24 and who are unaccompanied and homeless or self-supporting and at risk of being homeless qualify for a homeless youth determination, and will be considered independent students.”</p> <p>Unfortunately, in the notes for questions 55-57, the 2017-</p>	<p>CenterLink: The Community of LGBT Centers</p> <p>Child Welfare League of America</p> <p>Children's Advocacy Institute Colchester Creek</p> <p>Covenant House International</p> <p>Field Center for Children's Policy, Practice & Research</p> <p>Foster Family-based Treatment Association</p> <p>Healthy Teen Network</p> <p>HEAR US Inc.</p> <p>John Burton Foundation Juvenile Law Center</p> <p>Kaplan University</p>	

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	<p>2018 FAFSA continues to define “youth”, as applicants 21 years of age or younger. This definition conflicts with the CCRAA and the July 29 Dear Colleague letter. It places financial aid administrators in the untenable position of attempting to process applications under two conflicting definitions of “youth.”</p> <p>Additionally, the 2017 draft FAFSA online prompts include other problematic requirements for homeless youth, including written documentation of homelessness, in direct conflict with the July 2015 Dear Colleague letter; lack of appeal process or recourse for an incorrect determination of homelessness by the financial aid advisor; and continued language encouraging parental information.</p> <p>As a result, unaccompanied homeless youth who are 22 or 23 years old are not considered independent students by definition, must submit extensive and burdensome documentation to prove their homeless status, and have no recourse if FAAs make incorrect determinations. This policy continues to prevent eligible students from receiving financial aid.</p> <p>Recommended Changes to the FAFSA for Homeless Youth</p> <ol style="list-style-type: none"> 1. The 2017-2018 FAFSA should either omit a definition of youth, or define “youth” as 23 years of age or younger. 2. The online prompts for the 2017-2018 FAFSA should remove the requirement for written documentation, and remove the statement that the financial aid advisor’s decision is final. ED should create an effective means of 	<p>Mental Health America</p> <p>National Association of Counsel for Children</p> <p>National Association for the Education of Homeless Children and Youth</p> <p>National Association of Social Workers</p> <p>National Center for Youth Law</p> <p>National Foster Parent Association</p> <p>National Law Center on Homelessness & Poverty</p> <p>National LGBTQ Task Force</p> <p>National Network for Youth</p>	<ol style="list-style-type: none"> 1. Refer to comment #62.2 for resolution. 2. Refer to comment #62.2 for resolution.

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	<p>intervention when financial aid advisors fail to follow ED's policy guidelines and/or make incorrect determinations based on their own misunderstanding of the definition of homelessness.</p> <p>Background: The FAFSA and Foster Youth</p> <p>Our recommended changes to the FAFSA follow directly from the Consolidated and Further Continuing Appropriations Act of 2015, Public Law No: 113-235, which requires that the Department of Education (ED) do the following:</p> <p>(1) modify the Free Application for Federal Student Aid described in section 483 of the HEA so that the Free Application for Federal Student Aid contains an individual box for the purpose of identifying students who are foster youth or were in the foster care system;</p> <p>(2) utilize such identification as a tool to notify students who are foster youth or were in the foster care system of their potential eligibility for Federal student aid, including postsecondary education programs through the John H. Chafee Foster Care Independence Program and any other Federal programs under which such students may be eligible to receive assistance.</p> <p>The lack of clarity in defining the key terms "dependent," "in foster care," or "ward of the court" in Question 53 prevents many youth and young adults from accurately being identified as independent students for the purposes of the FAFSA and puts them at risk for not accessing grants, assistance, and student support programs as P.L.</p>	<p>National Safe Place Network</p> <p>Rights4Girls</p> <p>Southern Poverty Law Center</p> <p>Voice for Adoption</p> <p>Centennial Board of Cooperative Educational Services, Colorado</p> <p>Region 14 Education Service Center, Texas</p> <p>Wayne State University Transition to Independence Program, Michigan</p> <p>Western Regional Advocacy Project YouthCare, Washington</p> <p>California Coalition for Youth</p>	

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	<p>No. 113-235 intended. The Notes for question 53 on Page 10 of the FAFSA provide some guidance but leave many questions unanswered. Providing a pop-up help box with clear and immediate information about how to answer Question 53 will not only streamline a student's completion of the FAFSA, but will reduce the questions and calls that ED receives by providing clear information in a highly accessible direct format when the student is completing the FAFSA. In addition, providing a help box responds to the needs of former foster youth who may not have the assistance of parent or supportive adult as they navigate the FAFSA. The help box highlights important information that is critical to notifying students of their eligibility and also ensures accurate completion of the application,</p> <p>Repairing the skip function for the independent student questions so that all students have an opportunity to identify as a "dependent," "in foster care," or "ward of the court" corrects a facet of the FAFSA which is currently at odds with P.L. No. 113-235 because the current format prevents students from arriving at "an individual box for the purpose of identifying students who are foster youth or were in the foster care system." This modification will ensure that all former foster youth are identified and made aware of additional resources that will enable students to complete their post-secondary education.</p> <p>Recommended Changes to the FAFSA for Foster Youth</p> <p>3. Clarify Question 53 by creating a pop-up help box to define "Dependent," "in Foster Care," and "Ward of the Court." The Pop-Up Box should include the following:</p>	<p>Children Now, CA</p> <p>Children's Action Alliance, AZ</p> <p>Education Law Center, PA</p> <p>Florida's Children First</p> <p>Fostering Success Michigan</p> <p>Georgia Alliance to End Homelessness</p> <p>Homeless & Housing Coalition of Kentucky</p> <p>Illinois Collaboration on Youth</p> <p>Kansas Appleseed</p> <p>Michigan State University-Fostering Academics Mentoring Excellence Program</p> <p>Nebraska</p>	<p>3. No Change. Instructions are provided for each Free Application for Federal Student Aid (FAFSA®) question in the Help and Hints section on the right side of the page. When the cursor focus is on FAFSA Question #53, the associated help text displays. The Department of Education believes the current instructions provide adequate guidance.</p>

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	<p>a. Explain that the student is being asked about former foster care status only for purposes of accessing and being provided information about financial aid and assistance.</p> <p>b. Define the terms “dependent,” “in foster care,” and “ward of the court” and explain the various arrangements that may be included in these three terms.</p> <p>c. Clarify that the youth need not currently be dependent,” “in foster care,” or “ward of the court,” but only must have been at some time when they were age 13 or older even if they were subsequently adopted or entered a guardianship arrangement or other form of permanency.</p> <p>d. Clarify that this is a point in time eligibility status and that a discharge from the child welfare system to arrangements like guardianship or adoption do not jeopardize eligibility.</p> <p>e. Clarify the term “incarceration” in the context of juvenile justice system involvement (e.g., that it does not include home detention and other placements etc.) and that this exception applies only to those who are “currently” incarcerated and not prior to sentencing or once a youth is released, even if the youth is released on probation or parole.</p> <p>f. Provide a phone number to call to get help completing the FAFSA, including answering Question 53 properly.</p> <p>4. Eliminate the skip logic for “Independent” student status questions so foster youth are accurately identified</p>	<p>Appleseed</p> <p>New Mexico Voices for Children Redlich Horwitz Foundation, NY</p> <p>Student Advocacy Center of Michigan</p> <p>SW BOCES Homeless Student Program, NY</p> <p>The Mockingbird Society, WA</p> <p>Trinity J and D, LLC, GA</p> <p>University of Miami School of Law, FL</p> <p>Voices for Children in Nebraska</p> <p>Voices for Vermont's Children</p> <p>Voices for Virginia's Children</p> <p>West Chester University of</p>	<p>4. No Change. FAFSA Question #53 is one of the questions used to determine an applicant’s dependency status. If an applicant has already answered yes to a previous dependency question, there is no need to display Question #53.</p> <p>In 2015-2016, the following question was added to FAFSA on the Web</p>

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	<p>in the Student Aid Report. The current skip function in the questions about independent/dependent student status result in underidentifying youth who are or were “dependent,” “in foster care,” or “ward of the court.” Currently, if a young adult answers “yes” to questions 46-52 about independent student status (married, in the military, have dependent, for example), the applicant will skip to Step Five (question 95) and will not be asked about their current or former foster care status. These young adults will not be identified as “dependent,” “in foster care,” or “ward of the court” in the Student Aid Report (SAR). Identifying as a former foster youth in the SAR assists institutions in informing young adults about their potential eligibility for additional financial aid and student supports and provides the education and child welfare field more accurate information.</p>	<p>Pennsylvania Youth, Rights & Justice, OR Adams 14 School District, CO All Chicago Making Homelessness History, IL Alternative House, VA Alternatives Incorporated of Madison County, IN Berkeley Youth Alternatives, CA Bill Wilson Center, CA Brooklyn Community Services, NY Brownsville Independent School District, TX Buncombe County Public Schools</p>	<p>(FOTW®): “Are you a foster youth or were you at any time in the foster care system?” If an applicant answers “yes” to this question, he or she is notified both on the confirmation page and on the Student Aid Report (SAR) that he or she may be eligible for assistance through federal programs for foster youth. This informational text includes a link to a web site where the applicant can find contact information for his or her state ETV coordinator.</p> <p>In addition to notifying applicants who self-identify as current or former foster youth of the availability of additional resources, Student Aid Report (SAR) comments 165 and 166 can be used by schools as an indication of which students may benefit from additional outreach efforts.</p>

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		<p>Youth in Transition Program, NC</p> <p>CASA New Orleans (Court Appointed Special Advocates), LA</p> <p>Caldwell County Schools, NC</p> <p>Chicago HOPES for Kids, IL</p> <p>Churchland High School, VA</p> <p>Columbia Falls High School, MT</p> <p>Crossroads NOLA, LA</p> <p>Cumberland County Schools, NC</p> <p>Douglas County School District, NV</p> <p>East Allen County Schools, IN</p> <p>Essentials to Life, MI</p>	

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		<p>Families On The Move, Inc., MI</p> <p>Families and Youth in Transition, San Francisco Unified School District, CA</p> <p>Harlan County board of Education, KY</p> <p>HomeFront, NJ</p> <p>HOST, WA</p> <p>Introspect Youth Services, Inc., IL</p> <p>Journey to Dream, TX</p> <p>Lawyers For Children, Inc., NY</p> <p>McDowell County Schools, NC</p> <p>Orleans Public Defenders Office, LA</p> <p>Project 18, LA</p>	

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		Providence House, LA Rebuilding Independence My Style, DC Ruth Ellis Center, Inc., MI Sacramento Regional Coalition to End Homelessness, CA Saginaw County Youth Protection Council, MI Salinas Union High School District, CA Silver Creek High School, Longmont, CO Spotsylvania County Public Schools, VA St. Vrain Valley School District, CO	

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		<p>Strong Families Action Team, WY</p> <p>Synergy Services, MO</p> <p>The ED Ladder, CA</p> <p>Tukwila School District, WA</p> <p>Wayne Metropolitan Community Action Agency, MI</p>	
64.	<p>1. FAFSA Question 11</p> <p>11. Your driver's license number and driver's license state (if you have one)</p> <p>NCHER Response: We recommend this question be eliminated. It is an optional question and our members are not aware of any postsecondary institution or state grant agency using this field to determine eligibility for aid or for any other cross matching purposes.</p> <p>2. FAFSA Questions 24 and 25</p> <p>24. Highest school completed by Parent 1</p> <p>25. Highest school completed by Parent 2</p> <p>NCHER Response: We recommend the addition of "biological" prior to parent - for consistency and clarity</p>	<p>Vicki Shipley, National Council of Higher Education Resources</p>	<p>1. No Change. These questions and responses have been carefully selected in consultation with states since use of the information collected varies by state.</p> <p>2. Refer to comment #8.6 for resolution.</p>

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	<p>purposes. The current online instructions direct students to provide information about their biological parent for these questions. There are no instructions on these questions on the paper FAFSA. These are the only questions that ask specifically about biological parents. If the intention is to gather biological parent information to help identify first-generation college students, it would be helpful to precede Parent 1 and Parent 2 with “biological.” Without this clarification, many students are providing information about their stepparent, adoptive parent, etc.</p> <p>3. We also recommend the deletion of the current option #3 (College or beyond) and the addition of two new options: Certificate or Associate and Bachelor’s degree or beyond. Students are confused by the wording “College or beyond.” If the intention of this question is to identify students who may be first-generation college students and given that the definition of first-generation varies, it would be helpful to distinguish between the completion of an Associate’s degree versus a Bachelor’s degree.</p> <p>The revised questions would read as follows:</p> <p>24. Highest school completed by biological Parent 1 College or beyond</p> <p>Replace with Certificate Program or Associate Degree (e.g. community college, 1-2 years)</p> <p>25. Highest school completed by biological Parent 2 College or beyond</p> <p>Replace with Bachelor’s Degree (college or university, 4</p>		<p>3. Refer to comment #8.6 for resolution.</p>

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	<p>years or more)</p> <p>4. FAFSA Question 27</p> <p>27. High School Name</p> <p>NCHER Response: We recommend the addition of “Year of High School Graduation” to this question. The importance of tracking FAFSA completion numbers has been emphasized by Federal Student Aid (FSA). To support this effort, FSA created a FAFSA Completion by High School page, which encourages high schools to track FAFSA submissions and completions. Data from this page has also been used in a recent National College Access Network FAFSA Completion Grant application. The challenge is that the data is based on assumptions as to which students are current high school seniors (first-time filing applicants no older than 18 who will have received their high school diploma by the start of the school year for which they are applying for aid). These assumptions are not always accurate for two primary reasons: there are many high school seniors who are 19 and many high school seniors who have taken early college classes fail to answer as “Never attended college and 1st year undergraduate” and instead answer “Attended college before and 1st year undergraduate.” Assumptions would no longer be needed simply by adding “Year of High School Graduation” to the FAFSA.</p> <p>The revised question would read as follows:</p> <p><i>27. What is the name of the high school where you received or will receive your high school diploma? Enter</i></p>		<p>4. Refer to comment #33.1 for response.</p>

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	<p><i>the complete high school name, and the city and state where the high school is located, as well as the year you did or will graduate from high school.</i></p> <p><i>High School Name</i></p> <p><i>High School City</i></p> <p><i>State</i></p> <p><i>Year of High School Graduation</i></p> <p>5. FAFSA Question 31</p> <p>31. Are you interested in being considered for work-study? 1) Yes 2) No 3) Don't know.</p> <p>NCHER Response: We propose this question be removed from the FAFSA. The original intent of the question was to provide each school listed on the FAFSA a list of students to assign a potential work-study award and for the student to receive an award letter. The flag was collected on the ECAR transmission and the student's Institutional Student Information Record. The process created two unintended consequences. First, students demonstrated hesitancy to affirm consideration for work-study since they could see a reduction in grant opportunities within their award packages. Second, students were additionally inconvenienced with additional phone calls by financial aid administrators questioning work-study opportunities too early in the awarding cycle.</p> <p>Financial aid administrators are also impacted by question</p>		<p>5. Refer to comment #29.8 for resolution.</p>

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	<p>NCHER Response: Last year, the Department of Education announced it would no longer share the tally or order of schools that a student lists on the FAFSA with institutions of higher education, addressing the issue that some institutions used the information in sizing financial aid awards and/or making admissions decisions. The Department announced in December 2015, that beginning with the 2017-18 FAFSA cycle, it would no longer share the school list order with state grant agencies. This policy will greatly complicate the financial aid process for students and disrupt the delivery of state grant aid in 15 states that provide approximately \$2.5 billion in annual state student grant aid. The Department has provided no rationale or justification for discontinuing the sharing of this information with its state agency partners. Many states need the school order, which is a reliable predictor of where a student will go, to accurately project the size of state budget requests. Cutting off this flow of information to the states in the first year of the Early FAFSA (making the FAFSA application available on October 1, 2016, rather than January 1, 2017) will make providing awards to students that much more challenging when one of the stated goals of the initiative (and of using prior-prior year tax information) is to provide students with an earlier awareness of their eligibility for grant aid to pursue their postsecondary educational goals. NCHER strongly recommends the Department continue to provide state grant agencies access to the school list order.</p> <p>8. NCHER also supports the recommendation made by the National Association of State Student Grant Aid Programs to the FAFSA Step Six student instructions. The revised instructions would read as follows: <i>Enter the six-digit</i></p>		<p>8. Refer to comment #3 for resolution.</p>

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	<p><i>federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-500-433-3243. If you cannot obtain a code, write in the complete name, address, city, and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. as well as your state student grant agency. 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 2.</i></p> <p>9. Step 7</p> <p>Paid Preparer Information</p> <p>NCHER Response: The wording on the paper FAFSA is clear with regard to this question; however, the online version of the FAFSA is not clear. For consistency and clarity purposes, we recommend that the online version read similar to the paper FAFSA. The revised question would read as follows:</p> <p>Did you or your family pay a fee to a preparer to help you complete the FAFSA? Yes or No</p> <p>10. Federal Student Aid ID</p> <p>NCHER Response: We understand and support the need for a higher level of security and greater protection of personally identifiable information than was provided by</p>		<p>9. Refer to comment #33.2 for resolution.</p> <p>10. The Department of Education has referred these suggestions to the appropriate business unit to review recommendations and conduct additional research.</p>

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	<p>the prior use of PIN. However, the new FSA ID enrollment process has created a number of challenges for students and parents and has impacted FAFSA completion for both new and returning students for the 2016-2017 academic year. We know the Department of Education is reviewing this process and recommend the following ideas and recommendations related to the FSA ID creation and retrieval process.</p> <p>☐ When trying to retrieve a username or reset a password, is it possible to show the questions independently rather than all together?</p> <p>☐ Is it possible to offer additional instructions within the error messages? In some instances, the issue is with the FSA ID; in other instances, it is with the information that was entered in the FAFSA (for example, the date of birth or the social security number was incorrectly entered). If the error message could provide additional instructions on what is not matching as well as information to resolve the error that would be helpful to students and families.</p> <p>☐ Is it possible for the user to receive a text message for the password reset rather than waiting 30 minutes for the reset/retrieval?</p> <p>☐ Is it possible to designate a specific FSA ID hotline and list that number when an error message related to the FSA ID is shown? Currently, the number listed in the FSA ID FAQ's is answered as the Student Loan Support Center. Additionally, when an individual calls 1-800-4FEDAID, the user is instructed to dial 2 if the question relates to the FSA ID. That also results in the call being answered as the</p>		

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	<p>Student Loan Support Center. Having the phone answered as the Student Loan Support Center creates confusion and could result in some students deciding not to complete the FAFSA for fear that they are borrowing a federal student loan simply as a result of completing the FAFSA.</p> <p>In addition, we suggest that the language on the FSA ID creation page be strengthened in order to fully inform and remind users of the importance and implications of the FSA ID creation process. It would be helpful to include language on the initial creation page as well as on subsequent pages to alert users as they enter key information. For example, the following is suggested language that could be used on the "Create A New FSA ID" page and edited to be stated again on appropriate pages moving forward:</p> <p>PLEASE READ THE FOLLOWING IMPORTANT INFORMATION BEFORE CREATING YOUR FSA ID:</p> <ul style="list-style-type: none"> o Your FSA ID is your permanent identification for Federal Student Aid and will be used for all future FAFSA applications and for Federal Direct Loans, should you choose to borrow. o Your FSA ID is tied to your Social Security Number so you cannot simply create a new one if you forget your username and password. o Be sure you enter your information carefully and create a username, password, and challenge questions/answers that you will remember in the future. 		

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	<p>o Retrieval of forgotten or locked FSA ID information is easiest if you have a verified email address; if possible, use a non-school email address that you will continue to use in the future.</p>		
66	<p>Following are our comments on the 2016-02-01 draft of the FAFSA for 2017-18:</p> <p>1. Page 1. Perhaps its our printer, but compared to text on subsequent pages of the document, much of the text on page 1, except for section and column headings, has a fuzzy appearance that makes the words more difficult to read.</p> <p>2. Page 1, State Deadlines. We noticed that some state deadlines for 2017-18, including those for Oregon, are not accurate. State agencies submitted their deadline dates for 2017-18 to the Department in mid-February, so we hope those changes will be reflected in the second draft when it becomes available for the 30-day review period.</p> <p>3. Page 2, How do I find out what my Expected Family Contribution (EFC) is? It may help first-time applicants to explain how to access their SAR.</p> <p>4. Page 2, How much student aid will I receive? In line 5, add a comma before the phrase as determined by your college, or remove the comma before and your EFC.</p> <p>5. In addition, since the Department will be using income</p>	<p>Susan Degen, Oregon Higher Education Coordinating Commission</p>	<p>1. Thank you for the comment. The Department of Education tests the PDF FAFSA® on multiple printers to ensure that the images and text on the form print with the proper resolution.</p> <p>2. As stated in the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>, state deadlines on the draft FAFSA posted in March were not final. The draft FAFSA posted in July includes official deadline dates provided by state agencies.</p> <p>3. No Change. An explanation of how an applicant can access the <i>Student Aid Report (SAR)</i> is provided on page one of the <i>Free Application for Federal Student Aid (FAFSA®)</i> under the heading “Mailing Your FAFSA”.</p> <p>Additionally, if a valid student e-mail address is provided on the FAFSA, an e-mail confirmation is sent containing the list of steps a student should follow in order to access the SAR.</p> <p>4. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2017-2018 Free Application for Federal Student Aid</i>.</p> <p>5. Refer to comment #10.2 for resolution.</p>

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	<p>from 2015 to determine students aid eligibility for 2017-18, the instructions that refer to large changes in income from last year to this year may be confusing, particularly for those who file a 2017-18 FAFSA after January 1, 2017.</p> <p>6. Page 2, Where can I receive more information on student financial aid? For bullet 3, we suggest changing the phrase state aid agency to state student financial aid agency to clarify the type of state agency students should seek out.</p> <p>7. Page 3, Step Two (Student) instructions. We appreciate the addition of the phrase and are not remarried after divorced or widowed in line 2 of the instructions. This should help clarify whose income should be reported. Students may still be confused about whether they must report 2015 income for a former spouse, especially those who complete the FAFSA in 2017.</p> <p>8. Page 6, Step Four. The additional guidance for question 75 may confuse students who do not know if someone in their parents household begins to receive federal late in 2016 -- particularly those students who are not living at home when they file their 2017-18 FAFSAs.</p> <p>9. Page 8, Step Six instructions. State agencies met by conference call with Department of Education officials on May 16, 2016, regarding inaccurate language in the instructions for Step Six of the 2016-02-01 draft FAFSA for 2017-18. Per Jeff Baker, Ted Mitchell, and other officials on that call, states will continue to receive school lists from the CPS in the students original order for the 2017-18 academic year. This means that current instructions are</p>		<p>6. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>7. Thank you for the comment.</p> <p>8. Thank you for the comment.</p> <p>9. Refer to comment #3 for resolution.</p>

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	<p>incorrect. We request that the instructions for Step Six be replaced with language from the 2016-17 FAFSA, as follows: Enter the six-digit federal school code and your housing plans for each college or school you want to receive your FAFSA information. You can find the school codes at www.fafsa.gov or by calling 1-800-433-3243. If you cannot obtain a code, write in the complete name, address, city and state of the college. All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. In addition, all of your FAFSA information, including the list of colleges, will be sent to your state student grant agency.. .</p>		
67	<p>The Arizona Commission for Postsecondary Education would like to provide comment in support of a recent comment/letter provided by the National Association of State Student Grant and Aid Programs (NASSGAP). The Commission, along with many other states, is concerned with the wording used in the third sentence of Step 6 instructions for the 2017-2018 Free Application for Federal Student Aid (FAFSA). The draft reads: "All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list as well as your state student grant agency." Our currently funded state grant programs are decentralized and do not require the Commission to receive information from the student listing the priority preference of their intended college choices. Arizona colleges participating in our decentralized state grant programs send the Commission a roster of eligible students. However, the Commission must verify the student has sent a valid ISIR to a participating institution and confirm the student's eligibility. The student-selected</p>	Deena Lager, Arizona Commission for Postsecondary Education	Refer to comment #3 for resolution.

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	<p>list of colleges in the ISIR simplifies this process. An additional burden and possible barrier to access for Arizona students could occur in the future with this proposed change. In previous years when the Commission determined awards for any of its centralized state grant programs, data provided in the ISIR was used to identify and consider those students who listed an eligible Arizona institution for an award of need-based aid. When funding is provided in the future for centralized state grant programs, in order for the Commission to collect the student's intended Arizona college choices, this would create the need for a separate state grant application for students to complete in addition to the FAFSA. Not only would an additional application process be a burden on the student, but additional delays could be experienced if a paper application is implemented, or additional programming costs incurred for an online application could reduce the amount of available funds intended to assist our neediest and most deserving students with their educational goals. Other states with centralized programs will be facing these issues immediately if this proposed change is implemented. The Commission is hopeful that the states will continue to receive the student-selected list of colleges. In support of the US Department of Education's focus on simplifying the financial aid process, the Arizona Commission for Postsecondary Education recommends that the language used in the third sentence of Step 6 be modified to read as follows: "All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list. For state aid, you may want to list your preferred college first."</p>		
68	<p>1. I do not agree with the following proposal regarding: "Modifications to the Step Six instructions to indicate that</p>	Anonymous	<p>1. Refer to comment #3 for resolution.</p>

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	<p>state grant agencies will no longer receive the list of colleges submitted by the student. Revised instructions are: "...All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list as well as your state student grant agency. It does not matter in what order you list your selected schools." because this is NOT correct. PA will only send the estimated grant information to the 1st school listed on the FAFSA, no other school will receive that estimated state grant and therefore it affects students' offered awards. It should instruct them to follow up with their State Agency once they have decided which school they will attend so their grant award can be sent to that school.</p> <p>2. I also don't agree with the Simplified and Automated Zero EFC because there are cases where it's a student only lives with his mother, due to divorce, and mom doesn't filed taxes and therefore has a 0 AGI, however she does receive over \$150,000 in child support, and has close to 1 million dollars in investments, cash, savings, but since mom has a 0 AGI, the child support and the assets aren't considered. This is not treating families fairly. The biggest complaint I hear, working in financial aid for 10 years, is parents who state, "So basically we get penalized for working hard, savings money, and planning for the future because if I decided to quit my jobs and go on welfare then we would qualify for aid! Why are the students penalized for their parents doing the right thing, should all students be treated the same?" Unfortunately, I can't argue with their point that students will benefit in regards to financial aid if there parent does not work.</p>		<p>2. No Change. The Department of Education's authority to change the Need Analysis methodology is limited by statutory authority.</p>
69.	The Tennessee Student Assistance Corporation (TSAC) is deeply concerned about the proposal to eliminate the	Tennessee Student Assistance	Refer to comment #3 for resolution.

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	<p>school choice list that has been typically provided to state agencies. The elimination of the school list has the potential to be catastrophic to the administration of our state-administered programs, including our newest program called the Tennessee Promise Scholarship. TSAC would have to require students to take additional steps to provide our agency with their school choice even though that information has already been provided by the student on the FAFSA.</p> <p>Many of the Tennessee Promise students and recipients of our state's need-based grant are first-generation students. These students already face many barriers in navigating the financial aid process for the first time and need as much guidance as possible. To require these students to take additional unnecessary steps will ultimately lead to their potential ineligibility for state financial aid either through miscommunication or overwhelming frustration in having to provide duplicate information.</p> <p>Additionally, we have over 70,000+ students who receive our state's merit program, the HOPE Scholarship. The FAFSA serves as the sole application for this program and Tennessee uses the first eligible institution of choice to make an award to the student. The FAFSA has served its purpose during the first 10 years of the program and students have never been required to complete a secondary application. Randomizing or masking the school choice for this program would require each and every one of these 70,000+ students to take an additional unnecessary step of providing TSAC with their school choice. Again, TSAC would have to require these students to take an extra step to designate a school of choice even</p>	Commission	

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	<p>though the information is already provided on the FAFSA.</p> <p>In closing, these changes have the potential to be fatal to the administration of Tennessee's state programs. While I do not agree, I understand the reasoning behind limiting the school choice information provided to the institutions. However, there is no such argument to be made by randomizing or masking the school choice information to the state agencies. This information is vital to state's abilities to continue administering their programs in a timely and efficient manner. Please contact me if you would like to further discuss this issue. I can be reached at (615) 253-7441 or at tim.phelps@tn.gov. Thank you for your time.</p>		
70.	<p>The Wisconsin Higher Educational Aids Board is the state agency that is responsible for the administration of state funded scholarships and grants in Wisconsin. We are extremely concerned about the US Department of Education not supplying us with the students' choice of school as they enter on the FAFSA.</p> <p>We rely on the information provided from the US Department of Education to determine eligibility for grant awards to our residents of Wisconsin and to administer our grant programs as efficiently as possible.</p> <p>Not only does the information that we receive determine eligibility; it also provides us with the number of students and award amounts that we will be able to fund with our award dollars. Our having this information allows us to accurately award eligible students' at the college specified.</p>	John Reinemann, Wisconsin HEAB	Refer to comment #3 for resolution.

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	<p>In step six of the instructions on the FAFSA it states, "All of the information you included on your FAFSA, with the exception of the list of colleges, will be sent to each of the colleges you list as well as your state student grant agency". If we (the state student grant agency for Wisconsin) do not receive the schools that the student plans to attend in the order in which the student listed, or if that information is scrambled into a random order, it will disrupt our awarding process and changes the way in which we award our state funded grants. This will create disruption in awarding and service to the students that are trying to complete their education. Certainly this was not the intent of the US Dept. of Education.</p> <p>We are asking that you reconsider this change and continue to provide states with the entire list of schools in the order that the student reported them. Thank you for your consideration.</p>		
71	<p>The University of California strongly supports simplification of the Free Application for Federal Student Aid (FAFSA) as a way to reduce the burden on applicants, increase college-going rates, and effectively administer financial aid. One means for doing this was authorized in the Higher Education Opportunity Act, enacted in 2008, giving the Secretary of Education the authority to adjust the year of tax data used to determine federal aid eligibility in order to simplify the FAFSA process.</p> <p>UC applauds the Department of Education (ED) in its effort to implement the use of "prior-prior year" data for the 2017-18 academic year. This will dramatically simplify and improve the financial aid process for</p>	Janet Napolitano, President of University of California	

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	<p>millions of students and their families, allowing them to file the FAFSA earlier in the college application process and giving them three additional months to make informed decisions about where to apply and how to pay for college. Furthermore, the use of earlier tax data will greatly improve the utility of the Internal Revenue Service Data Retrieval Tool (DRT) in completing the FAFSA.</p> <p>Given this major change, UC offers two recommendations related to the Department's "Applicant Burden Model (ABM)," which is used to quantify the simplification process.</p> <p>1. UC would recommend that the ABM include a metric that considers the increased number of applicants who are able to successfully take advantage of the DRT. Allowing parents and families to use income information from a year when they have already filed taxes will likely lead to an increased use of the DRT, and measuring this change could be useful information to assess applicant burden.</p> <p>2. While UC fully supports the move to use prior-prior-year income information, we anticipate that there <i>could</i> be an increased number of requests for professional judgment or to review individual family's financial circumstances. To measure if this occurs, UC recommends that ED track the number of school-generated changes to FAFSA data as part of the ABM. While such instances are not submitted directly by the student, the rate of requests for schools to review a family's financial circumstances should be represented and evaluated in an assessment of the move to an early FAFSA .</p>		<p>1. The Department of Education has accounted for the increased number of applicants eligible to use the IRS Data Retrieval Tool (DRT) in its Applicant Burden Model.</p> <p>2. Thank you for the comment.</p>

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	<p>Following are additional technical comments in response to the proposed information collection request that was published in the Federal Register dated March 29, 2016:</p> <p>3. Most simplification proposals have attempted to reduce the number of questions students and families are asked to answer. This is a concern to UC, which wants ED to target its limited financial resources to students most in need. While the original form was difficult for low-income families to navigate, recent changes have improved the process significantly and the data-retrieval tools could be expanded to continue improvements.</p> <p>4. UC urges ED to maintain focus on the application process for students and their families and to not oversimplify the form so that institutions and states need to create additional forms to secure financial information they need about students in order to target their own means-tested state and institutional aid.</p> <p>5. When families opt to use the IRS DRT, the FAFSA does not currently identify retirement account rollovers because these amounts must be calculated using two separate fields on the tax return. As a result, affected families must update their information to reflect the proper rollover amounts in order to have their income treated fairly in federal need analysis. The DRT "flag" indicates that the submitted FAFSA/Institutional Student Information Record (ISIR) data needs review, causing extra burden for families and institutions. To avoid this, UC recommends that rollover amounts be collected in separate fields and the math to subtract the</p>		<p>3. The Department of Education continues to explore ways to increase the number of applicants and parents who can use the IRS DRT to transfer tax information that correctly answers questions on the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>4. Thank you for the comment.</p> <p>5. Refer to comment #35.2 for response.</p>

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	<p>rollover amount from the Adjusted Gross Income be done by the FAFSA in the background.</p> <p>6. UC supports the new use of Medicaid as a qualifying means-tested program for the Simplified Needs Test or Automatic expected family contribution (EFC) formula. This will simplify the FAFSA application process and increase the opportunity for financial aid for thousands of low-income individuals.</p> <p>7. UC would recommend that the active duty service member and veterans questions be restored for all FAFSA-on-the-Web users (Questions 49 & 50). Currently, applicants 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. However, these questions would help states and institutions better serve veterans and service members through outreach, financial aid and other available campus services, as well as improve available data on federal student aid awarded to veterans and service members.</p> <p>8. UC would recommend that the three questions related to a student's homeless status be simplified and reduced to one question, while keeping the related notes about the details of that determination and possible documentation that may be required.</p> <p>9. ED is trying to clarify its instructions for students who are unable to provide parental information, and UC</p>		<p>6. Thank you for the comment.</p> <p>7. Refer to comment #36.2 for response.</p> <p>8. Refer to comment #29.20 for response.</p>

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	<p>recommends a few edits as indicated in bold lettering below, to further improve the wording:</p> <p>"Under very limited circumstances (for example, your parents are incarcerated, you have left home due to an abusive family environment, or you do not know where your parents are and are unable to contact them), you may be able to submit your FAFSA without parental information. If these situations prevent you from providing provide parental information, skip Steps Four and Five, and go to Step Six. Once you submit your FAFSA without parental data, you must follow up with the financial aid office at the college you plan to attend, in order to complete your FAFSA. Your financial aid office may require documentation from social services, clergy, high school counselors or individuals that are familiar with your situation."</p> <p>10. For many California students, and some students in other states, there are forms-in addition to or instead of the FAFSA-that they must file to be considered for certain kinds of state or institutional aid. UC recommends edits to the FAFSA instructions, as shown in bold type:</p> <p><i>"If you have a Social Security number but are not a citizen or an eligible noncitizen, including if you have been granted DACA status, you should check with your state and complete the appropriate state form and/or the FAFSA because you may be eligible for state or college aid."</i></p> <p>11. If the Department of Education is no longer going to send the list of applicants' choices of schools, UC</p>		<p>9. Refer to comment #35.3 for response.</p> <p>10. Refer to comment #35.5 for response.</p>

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	<p>recommends that FAFSA allow students to list more schools and colleges on their initial application.</p> <p>12. UC sees the proposal to exclude the list of applicant college choices in data transmissions to states or institutions as a reasonable and acceptable change. In fact, the California Student Aid Commission (CSAC) has already developed a solution to making its Cal Grant awards in response to this proposed change, which is preferable from UC's perspective to the current practice.</p> <p>13. UC recommends that for 2017-18 that ED add a "C" code on the ISIR to make it easier for schools to flag and resolve cases where conflicting information has been identified that schools must resolve.</p> <p>Back to comment #71.</p>		<p>1. Refer to comment #1.1 for response.</p> <p>12. Refer to comment #3 for response.</p> <p>13. Refer to comment #23.1 for response.</p>