

Federal Student Aid Application Comments Tracking Summary

#	Comments	Commenter	Formal Response
1.	It would be most appreciated if you would add the word 'college' to question #29. It could read as follows: 29. What will your college grade level be when you begin the 2017-2018 school year? We already deal with students marking junior and senior to state their high school level. Now with the earlier file date, I would suspect we might see even more.	Valerie Curtin	<i>Free Application for Federal Student Aid (FAFSA®)</i> Question #29 has been modified to read: What will your college grade level be when you begin the 2017-2018 school year?
2.	I take issue with the Emancipated Minor question. It seems like a loophole to allow otherwise dependent students to exclude their parents' financial data. We have a student who provided court documentation from Arizona that an emancipation was granted, but the student has no means of financial self-sufficiency; in fact, the parents told us they were supporting the student and even paying his rent elsewhere. We could include parental support as untaxed income, but that will not affect his EFC because of the Simplified Needs Test, which is another area that is easily abused. I would favor removal of this question; additional comments could be included reminding students to seek a dependency override if appropriate.	Christina Gonzalez, The Julliard School	No Change. The Department of Education's authority to remove this question from the <i>Free Application for Federal Student Aid (FAFSA®)</i> is limited by statute. Please refer to the 2017-2018 Summary of Data Elements for additional information.
3.	Question 26- High School completion status, value 4 should say "other" instead of "none of the above" to eliminate unnecessary conflicting information. Many students have a high school diploma and answer as such on the FAFSA but when they are selected for High School verification, they provide a transcript showing an Associate's degree (since it is easier for them to obtain that instead of chasing down their High School diploma). If the student does not update his FAFSA and the school reports a Student Eligibility Code of "09" to COD, they get back an error that the Student Eligibility Code does not match the High School Completion Status reported on the FAFSA. However, the student is unwilling the change the response to a value 4 (to pass the Student Eligibility Code COD edit) since he DOES have one of the above. By changing	Anonymous	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> .

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	value 4 to "other" this will better reflect the fact that the student does have a High School Diploma (or a GED or was homeschooled), however, he is choosing to establish his eligibility based on his Associate's degree (or other recognized equivalent).		
4.	One of the questions in Step 3 of the FAFSA asks : As determined by a court in your state of legal residence, are you or were you an emancipated minor? If a student answers "YES" then they are determined to be in INDEPENDENT student. I have only seen this a couple of times but each time, the student was accompanied by a parent when they came into our office and were still living with the parent. This is a loophole for students to become Independent for FAFSA purposes. If the student isn't being supported by a parent and there are reasons they are unable to provide parental information, such as abuse etc, a financial aid administrator may do a Dependent override to declare them Independent. This question should be removed or our legislature should be informed on how this is being abused and the law should be changed.	Myrna Cross, Western Oklahoma State College	Refer to comment #2 for response.
5.	In the previous request for public comments, I recommended (#33) that the Department add a sentence "Students who file the FAFSA early may qualify for more grants." in the section of Page 1 labeled "Applying by the Deadlines". The Department responded "This recommendation is based on an assumption of school and state awarding philosophies. Because the timing of an applicant's Free Application for Federal Student Aid (FAFSA) 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." The Department's response is not factually correct. My response is not based on an assumption of school and state awarding philosophies. Rather, it is based on an analysis of data from the 2009 follow-up to the 200304 Beginning Postsecondary Students longitudinal study (BPS:04/09), which includes a variable, APPDATE, to record the date the FAFSA was received. Analyzing the amount of federal, state and institutional grants received by date, even after controlling for differences in	Mark Kantrowitz	Thank you for the comment.

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	<p>applicant characteristics, demonstrates that students who file the FAFSA later receive less grants. This is actual data, not an assumption. Given that this data was part of the justification for the current Administration's switch to prior-prior year, shouldn't it be sufficient for justifying the addition of this sentence? It is also consistent with the Administration's policy of encouraging low-income students to file the FAFSA sooner. The timing of an applicant's FAFSA does have an impact on eligibility for certain types of federal student aid. Specifically, each college has a limited allocation of campus-based aid, including the Federal Supplemental Educational Opportunity Grant (FSEOG). When this money runs out, it is gone. Enough colleges have a priority deadline for packaging campus-based aid that campus-based aid is not available to students who file the FAFSA later.</p>		
6.	<p>In the previous request for comments, I suggested adding a reference to College Goal Sunday under Filing Out the FAFSA. The Department responded that "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." The solution is obvious. The Department should give NCAN a grant so the Department can serve as a co-sponsor of College Goal Sunday, thereby enabling the Department to list College Goal Sunday in Federal Student Aid documentation.</p>	Mark Kantrowitz	Thank you for the comment.
7.	<p>The article at https://www.cappex.com/hq/articles-and-advice/paying-for-college/Frustrations-with-the-FAFSAs-FSA-ID identifies numerous problems with the FSA ID and its interaction with FAFSA on the Web. That article is hereby incorporated by reference.</p>	Mark Kantrowitz	<p>The FSA ID is a Federal Student Aid enterprise-wide mechanism for providing electronic signatures and is not simply the FAFSA's FSA ID.</p> <p>The public comment period for the <i>Free Application for Federal Student Aid</i> (FAFSA®) and <i>Student Aid Report</i> (SAR) is not the appropriate forum for comments about the FSA ID.</p>
8.	<p>We have seen in the past, but especially this year, a trend of students who receive notice that their FAFSA has been processed and their estimated award, so then they stop doing anything</p>	Chad Williams, Randolph Community College	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

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	<p>thinking they have completed the process. The reality is this is just the confirmation from their FAFSA submission and they often have several things to complete with us such as IRS data retrieval, verification forms, etc. I would like to see the confirmation wording either be edited or replaced to ensure students know to contact the school(s) they listed on their FAFSA to ensure everything is complete. It could be presented as a checklist where FAFSA submission is checked as complete, but then next step is not and instruct them to be prepared to complete items with the school(s) they listed.</p>		<p>a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>
9.	<p>I am submitting comments on behalf of the Office of Student Access and Completion, formerly the Oregon Student Access Commission. We are now an office within Oregon's Higher Education Coordinating Commission. Our office coordinates government and private financial aid programs, including Oregon's need grant program. We are generally pleased with the current draft of the 2017-18 FAFSA. However, our state agency needs to request a change in the deadline date for our new Oregon Promise program. Oregon's current deadline info on the latest draft FAFSA for 2017-18 are: OSAC Private Scholarships - March 1, 2017* Oregon Promise Grant - March 1, 2017* Oregon Opportunity Grant - As soon as possible after October 1, 2016 \$ Please change the deadline for Oregon Promise only, as follows: OSAC Private Scholarships - March 1, 2017* Oregon Promise Grant - Fall term, April 1, 2017 (date received); other terms, contact state agency *\$ Oregon Opportunity Grant - As soon as possible after October 1, 2016 \$ We assume symbols above will be "translated" for the deadline information that appears in FAFSA on the Web. However, to clarify, the FOTW language for Oregon Promise should appear as follows: Oregon Promise Grant - Fall term, April 1, 2017 (date received); other terms, contact state agency. Additional forms may be required. Awards made until funds are depleted. Thank you for the opportunity to provide comments!</p>	<p>Susan Degen, Oregon Office of Student Access and Completion</p>	<p>The deadline for the Oregon Promise Grant has been updated as requested.</p>
10.	<p>The new IRS Get a Transcript security restrictions</p>	<p>Mark Kantrowitz</p>	<p>The IRS Get Transcript site is owned by the Internal Revenue Service and is</p>

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	<p>(https://www.irs.gov/individuals/get-transcript) are going to cause problems for low-income FAFSA applicants who are unable to use the IRS Data Retrieval Tool. Some applicants are unable to use the IRS Data Retrieval Tool for various reasons, such as a change in the marital status of the applicant or the applicant's parents, the applicant's parents never married but live together, applicant's parents have an informal separation but file a joint return, applicants who file amended federal income tax returns or foreign income tax returns, home address on the FAFSA does not match the address on the federal income tax return and taxpayers who are victims of identity theft. The Get Transcript by Mail service sends the IRS Tax Transcripts to the address on the latest tax return. This is problematic for applicants who have moved or who do not have a fixed home address. Not every applicant can use USPS postal mail forwarding as a workaround. For example, survivors of domestic abuse may not want the abuser to be able to learn their current location. The Get Transcript Online service requires the applicant to have a credit card number or an account number for an auto loan, mortgage, home equity loan or HELOC, as well as a mobile phone with the applicant's name on the account. Many low-income students don't have either of these. Accordingly, if an applicant is unable to use the IRS Data Retrieval Tool, the applicant may also experience problems obtaining a tax transcript. This problem will disproportionately affect low-income students. The only option for these applicants will be to file IRS Form 4506-T by postal mail. This can cause delays in the disbursement of aid.</p>		<p>not the responsibility of Federal Student Aid.</p> <p>The public comment period for the <i>Free Application for Federal Student Aid</i> (FAFSA®) and <i>Student Aid Report</i> (SAR) is not the appropriate forum for comments about products and services unrelated to the FAFSA, particularly when those products and services are the responsibility of other government agencies.</p>
11.	<p>An issue that our institution encounters involves the marital status options in the student section of the FAFSA; specifically the option to select "I am Single". Many divorced, separated, or widowed individuals will choose 'Single' instead of div/sep/wid as they consider themselves 'single'. Is it at all possible for the marital options to more closely match the options provided in the parent section of the FAFSA? Having an option of 'Never Married'</p>	<p>Tamla Covington, Georgia State University</p>	<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</i> (FAFSA®).</p>

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	completely eliminates the cause for confusion in the parent section of the FAFSA and eliminates confusion during the verification process.		