

### Federal Student Aid Application Comments Tracking Summary

#	Comments	Commenter	Formal Response
1.	Make applicants answer yes or no to the different public benefits questions so financial aid administrators will know upfront they receive public assistance and will have no need to ask or look into how they financially support themselves when they are already receiving public assistance.	Anonymous	No Change. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process.
2.	Parent's Marital Status (question 59) has been confusing to families over the years. That is clearly demonstrated in the comments as well. I would suggest logic that works something like this: Q: As of today, what is the marital status of your legal parents biological and/or adoptive parent(s)? Answer: Divorced/Separated (REMOVE REMARRIED FROM THE OPTIONS) These questions is only if 'Divorced or Separated' or 'Widowed' is selected Q: When did your parent become divorced or separated? Enter the month and year. (mmyyyy) Answer: 12/2011 Q: Which parent's information will be provided? A: Mother (example) Q: As of today, is your mother remarried? A: Yes Q: When did your parent remarry? Enter the month and year. (mmyyyy) A: 07/2014 (Pop up the Identifiers for two parents.) Add a note: ALL THE PARENT QUESTIONS MUST BE ANSWERED USING YOUR MOTHER'S AND STEP-PARENT'S INFORMATION.	Mayra Vazquez, Virginia Western Community College	This question has already been updated for 2018-2019. You can see this change on the draft FAFSA posted <a href="#">here</a> . We will continue to monitor our feedback channels to determine if further changes are needed in the future.
3.	Parents' tax-deferred pension payments are often missed, along with the other categories under "Parents' 2016 Untaxed Income" because parents have to know to click the box that it applies to them and THEN the option will show to type in the amounts for untaxed income. At the very least, could we have the tax-deferred pension payments question readily appear so that it doesn't get skipped? We frequently have discrepancies between the FAFSA and CSS PROFILE due to the tax-deferred pension payments. Also, families who miss reporting	Jessica Black, Lewis & Clark	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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	this question may get a Pell Grant when they actually aren't eligible for Pell if they knew to answer this question. We are able to catch it because we also look at the CSS PROFILE, but a lot of other schools don't.		
4.	If we are encouraging DACA or other non-eligible non-citizens to fill out a FAFSA to apply for State and/or scholarship aid at their college, it would be helpful to not have to do workarounds in our offices to get an EFC, or to get our software to work with a citizenship reject. Instead of outright rejecting the FAFSA on a student who is not a citizen or eligible non-citizen, please consider making option "3" produce an EFC. You could add a "Not Eligible for Federal Aid" Flag, and a Citizenship Edit with a Comment Code. The "C" code and "No Federal Aid" Flag should be sufficient to prevent schools from awarding Federal Aid. For those students who made a mistake and are actually a citizen or eligible non-citizen (or who later have their immigration status updated), a correction could be made to remove both the Comment Code and Flag so as to allow for the awarding of Federal Aid.	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> .
5.	The student's educational credit, as well as the parents on the Puerto Rico Tax Return (Unique Form - form 482.0, page 2, part 3, line 25 C) are often included by mistake in the FAFSA question 44a/93a as an income exclusion. <a href="http://www.hacienda.gobierno.pr/sites/default/files/individuals_2016.pdf">http://www.hacienda.gobierno.pr/sites/default/files/individuals_2016.pdf</a> In Federal Tax Return (Forms 1040A and 1040) the Education Credit could be presented in one of two forms ... as a refundable credit which must not include in the FAFSA ... or as nonrefundable education credit which is included in the FAFSA line # 44a/93a. In Puerto Rico Tax Return, the American Opportunity Tax Credit can only present as reimbursable (refundable credit), we do not have the nonrefundable education credit. At the very least, could you include instructions for the	Heriberto Velazquez, Pontifical Catholic University of Puerto Rico	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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	<p>FAFSA question 44a/93a, which in the case of a refundable credit cannot be reported? The families who including this refundable credit in the FAFSA may get a Pell Grant and other aids, when they actually aren't eligible.</p>		
6.	<p>FAFSA Question #44/93: Issue: Question's #44 and #93 are income exclusion based, meaning the amounts entered in the corresponding fields (6 options in each question) reduce the AGI, which in turn reduces the EFC and increases need. The questions are also not verifiable, thus, institutions generally do not review these questions closely (if at all). The following recommendations are offered when an applicant enters information on questions:</p> <p>44d. Taxable college grant and scholarship aid reported to the IRS in your adjusted gross income. Includes AmeriCorps benefits (awards, living allowances and interest accrual payments), as well as grant and scholarship portions of fellowships and assistantships. 93d. Your parents' taxable college grant and scholarship aid reported to the IRS in your parents' adjusted gross income. Includes AmeriCorps benefits (awards, living allowances and interest accrual payments), as well as grant and scholarship portions of fellowships and assistantships.</p> <p>1. If an applicant answers questions 32 and 80 as "not going to file", insert skip logic so a,c,d, and e (noted below) are omitted from the applicants view: Question 44: Student's 2015 Additional Financial Information (Enter the combined amounts for you and your spouse.) a. Education credits (American Opportunity Tax Credit and Lifetime Learning Tax Credit) from IRS Form 1040line 50 or 1040Aline 33. c. Taxable earnings from need-based employment programs, such as Federal Work-Study and need-based employment portions of fellowships and assistantships. d. Taxable college grant and scholarship aid reported to the IRS in your adjusted</p>	Kim Jenerette	<p>1. Thank you for your comment. When an applicant or parent selects "Not going to file" in response to "Have you completed your IRS income tax return...?" (Questions 32 and 80), questions 44a and 93a are not displayed on fafsa.gov. Skip logic currently exists so that these questions are not displayed to non-filers.</p> <p>The Department of Education needs to further assess the impact of applying the same logic to questions 44 and 93 c, d and e. 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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	<p>gross income. Includes AmeriCorps benefits (awards, living allowances and interest accrual payments), as well as grant and scholarship portions of fellowships and assistantships. e. Combat pay or special combat pay. Only enter the amount that was taxable and included in your adjusted gross income. Don't include untaxed combat pay. Question 93: Parents' 2015 Additional Financial Information (Enter the amounts for your parent[s].) a. Education credits (American Opportunity Tax Credit and Lifetime Learning Tax Credit) from IRS Form 1040line 50 or 1040A line 33. c. Your parents' taxable earnings from need-based employment programs, such as Federal Work-Study and need-based employment portions of fellowships and assistantships. d. Your parents' taxable college grant and scholarship aid reported to the IRS in your parents' adjusted gross income. Includes AmeriCorps benefits (awards, living allowances and interest accrual payments), as well as grant and scholarship portions of fellowships and assistantships. e. Combat pay or special combat pay. Only enter the amount that was taxable and included in your parents' adjusted gross income. Don't include untaxed combat pay. Justification for leaving b and f visible: It is possible that a student/parent may not file federal taxes and still pay child support and/or earn income from a cooperative education program.</p> <p>2. If/when an applicant's enters information on question 44/93d, a pop up box appears with the following message: "You have entered an amount in taxable grants and scholarships. Be sure that you have entered or will enter the amount of scholarships and grants that you reported or will report on your federal tax return, not the amount that you were awarded. Scholarships and grants are usually NOT reported as taxable income unless they exceed the cost of tuition and required fees, books</p>		<p>2. This question has already been updated for 2018-2019. You can see this change on the draft FAFSA posted <a href="#">here</a>. We will continue to monitor our feedback channels to determine if further changes are needed in the future</p>

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	and supplies." While the current question is not poorly worded, it is our finding that many of the families misunderstand the question and when reading "college grant and scholarship", they do not continue to read (despite the bold wording) the full sentences and erroneously add information. Thank you ...		
7.	<p>1. Is there any way that we can require students/parents answer FAFSA questions 41, 42, 43 and 90, 91, 92?</p> <p>2. Also, can we not allow students/parents to make changes to these questions once they submit their answer? When students/parents make changes to their answers, these are unallowable changes (as the answers needs to be from the date the original FAFSA was submitted). Because they are unallowable changes, we have had to create additional processes to resolve these unallowable changes. It would be so much easier for students and staff if only staff could make changes to these answers once presented with a statement and documentation from the student regarding their answers being incorrect at the time of filing.</p> <p>3. Additionally, it is very frustrating when a student does not initially answer the asset questions but then we later need them answered. This happens very often and only further holds up a student's aid. I think it would help many administrators and students to fix this process!</p>	Gina Valerius, University of Arizona	<p>1. No Change. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process. Answers to these specific questions are not necessary for applicants who qualify for the simplified needs test or have total assets below the asset protection allowance. Therefore, skip logic hides these questions when responses are not needed to calculate the Expected Family Contribution (EFC).</p> <p>2. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>3. <a href="#">Refer to comment #7.1 for resolution.</a></p>

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8.	<p>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"!</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>	Mary Gerardy, North Dakota State University	<p>1. No change. When completing the <i>Free Application for Federal Student Aid</i> (FAFSA®) online, if a student meets specific criteria, certain questions can be skipped.</p> <p>2. No Change. The 2018-2019 paper <i>Free Application for Federal Student Aid</i> (FAFSA®) has instructions on page 1 that state: "Blue 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 the online FAFSA. Parent information 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 the online FAFSA 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</i></p>

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	<p>4. Q.21- Can this say gender at birth? With trans genders, if they were born male they still have to register for selective service? We're having an issue with people NOT marking their gender, which affects other questions or triggers C-code issues unnecessarily.</p> <p>5. Q22- Can this be reworded to say "If female at birth, skip to question 23. If male at birth, answer this question.?"</p> <p>6. Q24 &amp; 25- Prior to this question, there should be clarification of the parent they should be using. So many just think biological parent(s).</p> <p>7. Q28 student marks No, then for #29 they mark that they are a graduate student, but then in #30 states that they are working on their first bachelors. OR in #48 say No to working on masters, doctorate, or graduate certificate. It also wouldn't hurt to clarify that a graduate student does NOT mean that you have graduated from high school. 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>8. Q35- If they answer #33 as IRS 1040A or EZ (2), have this automatically fill in yes.</p>		<p><i>Application for Federal Student Aid (FAFSA®).</i></p> <p>4. <a href="#">Refer to comment #11 for resolution.</a></p> <p>5. <a href="#">Refer to comment #8.4 for resolution.</a></p> <p>6. No Change. These questions and responses have been carefully selected in consultation with the states since use of the responses varies by state.</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. If an independent applicant filed a 1040A or a 1040EZ and meets the income threshold, Question #33 does not display because the response is not needed;</p>

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	<p>9. Q36 – 38- Explain if they are married and they filed separate returns in 2015, they need to add this information together.</p> <p>10. Q38- 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>11. 41 - 43. Don't let them bypass this information. It would be helpful if schools could see the threshold amount.</p>		<p>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>9. No Change. The “Notes” on page 1 of the paper <i>Free Application for Federal Student Aid (FAFSA®)</i> 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 2016. For assistance with answering the income information questions in this situation, call 1-800-4-FED-AID (1-800-433-3243).” For online FAFSA filers, extensive help text provides the necessary guidance for separate tax filers.</p> <p>10. No Change. Criteria for being considered independent is described throughout the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>11. 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</p>



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	<p>12. Q43- Make family farm and business stand out more.</p> <p>13. Q44d 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>14. Q45- Bold statement to "Do NOT include SSI as untaxed income".</p> <p>15. 45 e &amp; f What's frustrating is when and</p>		<p>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 Institutional Student Information Record (ISIR), and therefore available to schools. Additional information on the Asset Threshold and the APA fields can be found in the <a href="#">ISIR Guide</a>.</p> <p>Information about the APA and the EFC calculation can be found in the <a href="#">EFC Formula Guide</a>.</p> <p>The <a href="#">2018-2019 Justification of Data Elements</a> contains explanations on the asset fields and how the APA is determined.</p> <p>12. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>13. This question has already been updated for 2018-2019. You can see this change on the draft FAFSA posted <a href="#">here</a>.</p> <p>14. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p>

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	<p>Pension/IRA is included on the FAFSA through DRT, but when they make a correction to remove it because it was a rollover, DRT becomes invalid. There must be a way this can be remedied.</p> <p>16. Q49 &amp; 50- Can you state "who was federally activated" instead of, or in addition to "for other than state or training purposes?"</p> <p>17. Q51 &amp; 52. Can you emphasize who will receive more than half their support from you?</p> <p>18. Q53. Can you emphasize that they need to have death certificates or court documentation showing these statuses?</p> <p>19. Q54 &amp; 55- Can you emphasize that they need to have court documentation showing these statuses?</p> <p>20. Q56 - 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>21. No more leaving questions "Blank"! #'s 16, 19, 22, 23, 31, 32, 33, 34, 35, 59 Asset Threshold Exceeded &amp; 102.</p>		<p>15. Refer to this <a href="#">Electronic Announcement</a> for information describing changes to the IRS Data Retrieval Tool (IRS DRT) process for 2018-2019.</p> <p>16. No Change. The Department of Education believes the questions and instructions provide adequate guidance.</p> <p>17. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>18. 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>19. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>20. 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</i> (FAFSA®).</p> <p>21. No Change. If the student submits a paper <i>Free Application for Federal Student Aid</i> (FAFSA®), it is rejected if Questions 16; 19; 23; 32; 33 (tax filers only) or 34 (tax filers only) are blank. When completing the FAFSA online, the student is unable to proceed if these questions are left 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</p>

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	<p>22. Q62 &amp; 66. Lengthen last name for those with hyphenated names.</p> <p>23. Q73. State "Don't include other biological or step-parent if they have divorced and they no longer live in the same home".</p> <p>24. No more leaving questions "Blank! Parent's Grade Levels, 80, 81, 82, 83, 84, &amp; Asset Threshold Exceeded.</p>		<p>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 online 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 the online FASFA. When the question displays, a response is required in order to proceed.</p> <p>22. <a href="#">Refer to comment #8.3 for resolution.</a></p> <p>23. No Change. The Department of Education believes the current question and instructions provide adequate guidance.</p> <p>24. No Change. Questions 24 &amp; 25 (Highest school completed) are not required to be answered to determine eligibility for federal student aid.</p> <p>When a dependent student submits a paper <i>Free Application for Federal Student Aid</i> (FAFSA®), it is rejected if Question 80 is 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 <a href="http://fafsa.gov">fafsa.gov</a>, the student is unable to proceed if these questions are left blank when displayed.</p> <p>Questions 83 and 84 dynamically display on the FAFSA when the student is dependent. If dependent, the</p>

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	<p>25. Q83. If they answer #81 as IRS 1040A or EZ, have this automatically fill in yes.</p> <p>26. Q85 – 87- Explain if they are married and they filed separate returns in 2015, they need to add this information together.</p> <p>27. Q90-92- It would be helpful if schools could see the threshold amount used to determine if they need to submit Asset information or not. The student is not providing their information because it asks them a question “Do you want to continue providing student and parent information”. They say no, so it doesn’t ask for anything else. Student’s information should always be required and not skipped.</p> <p>28. Q92- Make family farm and business stand out</p>		<p>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 the online FAFSA. When the question displays, a response is required in order to proceed.</p> <p>25. No Change. If a dependent applicant’s parent(s) filed a 1040A or a 1040EZ and meet the income threshold, 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 the parent(s) filed a 1040A or a 1040EZ and do 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> <p>26. <a href="#">Refer to comment #8.9 for resolution.</a></p> <p>27. 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>

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	<p>more.</p> <p>29. Q93d 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>30. Q94 Bold statement to "Do NOT include SSI as untaxed income".</p> <p>31. Q94 e &amp; f What's frustrating is when and Pension/IRA is included on the FAFSA through DRT, but when they make a correction to remove it because it was a rollover, DRT becomes invalid. There must be a way this can be remedied.</p> <p>32. Clarify what an amended tax return is. It's when you make changes to the information from the original tax return.</p> <p>33. Clarify the questions that allow DRT to be used. People don't answer no to the questions when they should. People have problems using it due to address issues. Is there any other way it can be linked? What is DRT? It is NOT when you manually enter the tax return information on the FAFSA. It's when you actually go out to the IRS website and draw in the tax information onto the FAFSA. Also, when DRT is used, we can't see the whole return, just certain lines that we allowed to see. Even if you use DRT you have to manually enter the income amounts for the student and parent(s).</p>		<p>28. <a href="#">Refer to comment #8.12 for resolution.</a></p> <p>29. <a href="#">Refer to comment #8.13 for resolution.</a></p> <p>30. <a href="#">Refer to comment # 8.14 for resolution.</a></p> <p>31. <a href="#">Refer to comment #8.15 for resolution.</a></p> <p>32. No Change. The questions that ask applicants and parents if an amended tax return was filed have been removed from the 2018-2019 <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>33. No change. The user experience flow was changed for the 2017-2018 <i>Free Application for Federal Student Aid</i> (FAFSA®) to encourage people to use the IRS Data Retrieval Tool (IRS DRT). Additionally, all but one of the filtering questions have been removed (<a href="#">see response for comment #8.32</a>). For more information please review last year's <a href="#">Summary of Changes for the Application Processing System Guide</a>.</p>
9.	Thank for you this opportunity to provide additional feedback on the 2018-19 Free Application for Federal Student Aid form (FAFSA) with specific focus	Carrie Warick, National College Access Network & Kim Cook, Executive Director,	

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	<p>on the time burden to complete the form, including the follow up corrections process necessary to complete FAFSA verification.</p> <p>1) In the second notice under docket ED-2017-ICCD-0044, the U.S. Department of Education requests approval of all application components of the FAFSA as a single “collection of information” with an aggregate burden for all. Included in the notice is the methodology for calculating the burden, which is based on the average filing time per student. In these comments, NCAN outlines how the completion time varies greatly by student and that the Department should take special concern with the burden placed on low-income families in completing the FAFSA, particularly those who are selected for verification. According to the estimated number of FAFSAs and burden hours reported in the notice, the average FAFSA filer will spend 39 and a half minutes completing the FAFSA form. This includes, according to the Aggregate Burden Model (ABM), “the average amount of time involved in preparing to the complete the application.” Based on over 20 years as a membership organization focused on FAFSA filing, this estimate is extremely low to include the time required to gather necessary documentation. The publically reported FAFSA completion time for first-time, dependent filers completing the full form in the 2015-16 filing cycle is 46 minutes and 17 seconds. While the average time may still hold true, NCAN recommends that the Department focus on reducing the burden for the lowest-income students, as they are most in need of aid and most likely to have an average amount of time far about the average suggested by the ABM.</p>	National College Access Network	<p>1. Thank you for your comment. The Department of Education has made several enhancements to the 2018-19 <i>Free Application for Federal Student Aid</i> (FAFSA®), including expanding the pool of applicants and parents eligible to use the IRS Data Retrieval Tool (IRS DRT), in an effort to further simplify the application process for all users. Additionally, enhancements planned for release later in the application cycle will further ease user burden. As always, it is a Department of Education priority to improve the user experience and make the opportunity of higher education more accessible for all.</p>

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	<p>2) Further, the ABM does not specifically address whether the time spent to complete the verification process is included. Given that 98 percent (5.2 of 5.3 million) FAFSAs selected for verification in 2014-15 were Pell-eligible applicants, the significant additional time to complete the verification process should be considered as part of the burden on the FAFSA filers most in need of federal financial aid. (<a href="http://www.collegeaccess.org/BlogItem?dg=e3bc0e74-9e8d-4cc2-8091-5603b0aa93a0">http://www.collegeaccess.org/BlogItem?dg=e3bc0e74-9e8d-4cc2-8091-5603b0aa93a0</a>). The largest struggle for students of NCAN members in completing the verification process is requesting and receiving documents from the Internal Revenue Service (IRS). Low-income students who must provide a copy of their tax return or obtain a verification of non-tax-filer letter struggle the most. To obtain a tax transcript, most low-income students must fax requests to IRS offices during the height of tax season. They are unable to use the tax transcript retrieval tool online because the stringent security identifiers require a cell phone plan in your name and a credit card, mortgage or auto loan. Many low-income individuals do not have any of these options; therefore, they must request the forms by fax or in person. The experience of our members assisting students is that the IRS does not prioritize these requests and that the wait times can far exceed the estimated 10 business days during tax season, which can jeopardize students' ability to receive financial aid.</p> <p>The requirement for non-tax filers to prove that they did not file taxes is the most onerous. NCAN greatly appreciates the change for the 2018-19 award year that will not require dependent students to provide this documentation given that many dependent students, regardless of socio-economic status, do not earn enough money to file taxes. However, in light of the news that the IRS will not allow receipt of</p>		<p>2. The Department of Education has referred this feedback to the appropriate business unit to review recommendations.</p>

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	<p>VONF statement from the Data Retrieval Tool, NCAN encourages the Department to consider this requirement for parents and independent students. We respectfully suggest revisiting this conversation with the IRS if possible or allowing independent students and parents of dependent to continue to be able to provide a signed statement to their college rather than file a formal 4506-T requesting documentation from the IRS. Given the reports of individuals being turned away from the regional IRS offices, such as being told that only tax filers can make appointments, this would significantly reduce the burden on the lowest income families attempting to attend higher education.</p> <p>In summary, NCAN respectfully requests that the ABM more full account for the time required to gather paper work and complete the verification process and that non-tax filers continue to have options for completing verification beyond faxing the IRS or visiting them in person. Thank you for your attention to these issues.</p>		
10.	<p>Thank you for the opportunity to comment on the Department's draft of the 2018-2019 Free Application for Federal Student Aid (FAFSA). The current version of the draft changes the application's only question about sex from "Are you male or female?" to "Were you born male or female?" In both the historical version and this proposed new version, the form also provides clarifying instructions later in the document instructing applicants to provide the sex they were assigned at birth. Without knowing for sure the intention of this change, one can only guess that it's meant to make instructions clearer for those who might not have known how to answer this question before, namely transgender applicants. However, asking applicants' sex presents many challenges, not limited to confusion over completing the form, that the new phrasing fails to</p>	Sabia Prescott, New America	<p>No Change. The Military Selective Service Act prohibits, with limited exceptions, any person required to register with the Selective Service who fails to do so from receiving any form of assistance or benefit provided under Title IV of the Higher Education Act of 1965, and further requires the Secretary of Education to work with the Director of the Selective Service System to implement this prohibition. 50 USC 462(f)</p>



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	<p>address.</p> <p>Transgender students, particularly low-income transgender students, are some of the most in need of federal aid but, in part because of this question, may also face the largest barriers in obtaining it. Asking applicants to list their sex -- indeed without regard to the differences between sex and gender -- may cause data match problems, confusion about applicants' identities, and delays for those students in obtaining aid.</p> <p>There is no version of this question that could eliminate these problems. Therefore, I urge the Department to divorce itself from the Selective Service System (SSS). Doing so would eliminate the need to verify students' enrollment in the Selective Service, and therefore eliminate the need for a sex question altogether. While there are steps the SSS could take itself to ensure proper treatment of all people, student aid is another concern and breaking this tie is well within the Department's purview. There is no substantiated reason ED and SSS should be connected in this way and disconnecting the two could eliminate one of many obstacles transgender students face. The comments offered below explain why the proposed phrasing change achieves nothing; what could be done instead; why it should be done; and what doing so would mean for students.</p> <p>Transgender students, or those who identify as a sex or gender different from the one they were assigned at birth, are not a niche group. Because of myriad difficulties in collecting data around transgender people, we do not know exactly how big this population is 1. However, a recent study from the Williams Institute estimates 6%, or 1.4 million people, to be transgender 2. Assuming roughly that 6% of FAFSA applicants are also transgender, it's clear to see that this group is no small consideration. It is also important to note that my suggestion in this</p>		

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	<p>comment is not asking the Department to cater to social trends or beliefs that align with a particular party or religion. Creating policies that give all students equal opportunity should not depend on policymakers' social beliefs or understanding about transgender people. This group should be a priority because they are currently at a disadvantage in obtaining federal aid. They should be made a priority regardless of social beliefs because they are as much students in need as any other applicants and deserve to be treated as such.</p> <p><b>The current proposed change would make no difference for those whom it negatively affects</b></p> <p>Ambiguity in the directions for completing the form are only a small part of the problem. Indeed by changing the question from "Are you male or female?" to "Were you born male or female?" the only problem resolved for students is how to complete the form. In both the old and new versions of the FAFSA, the application instructs students to select the sex they were assigned at birth, proving that the new phrasing has actual no change in meaning and therefore does not accomplish anything that the old phrasing did not.</p> <p><b>The gender question presents complicated problems</b></p> <p>I urge the Department to look beyond this simple change and consider carefully what this question means for transgender students 3. Asking for students' sex at birth can out that student as transgender to their peers, to their teachers, or to the administration. This presents grave safety concerns for some. In addition, because some students may be able to physically and legally transition to the opposite sex before the age of 18, and therefore have their birth certificate changed before that age, they may be no longer or only recently required4 to enroll in SSS -- depending on if they transitioned from male to female or vice versa.</p>		

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	<p>If they make this change and are then required to list the sex they were assigned at birth, there may be data match problems that could hold up their funding.</p> <p>Additionally, these circumstances are only possible for transgender students who transition before the age of 18, when males must enroll in the Selective Service. Not all transgender students want to physically transition, and certainly not all can afford to. Legally transitioning, in most states, requires a signature from the physician who performed the surgery. For those students who cannot afford to see a doctor or choose not to transition, applying for financial aid may be big a risk. If presented with the choice to either risk being outed in an unsafe environment or not get funding for higher education, some students may choose the latter.</p> <p><b>An agency divorce is the only choice</b></p> <p>As stated, there is no phrasing of the gender question that would eliminate these complex problems. It's nearly impossible to phrase demographic gender questions without either adhering to a strict and inaccurate gender binary, or offering so many options that the data become meaningless. Therefore, I am suggesting that the Department divorce itself in this way from SSS. Without this tie -- that is, without requiring Selective Service enrollment as a precondition for receiving federal aid -- there would be no need for a gender question at all. Taking this step would acknowledge that transgender students exist, that they are as valued as any other student, and that they are complex people who face complex problems. As you may know, bathroom bills are far from the extent of education policies that affect transgender students but because they monopolize headlines, they appear to be the only problem these students face.</p> <p>Acknowledging that transgender students face additional barriers from things as seemingly benign</p>		

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	<p>as wording of a question on a form is a crucial step in creating equity for all students. There is no substantiated reason that the Department should be responsible for ensuring that students are enrolled in the Selective Service. Doing so creates a set of complex obstacles for a group that already face a disproportionate number of challenges. By detaching itself from SSS, the Department would send a strong message that it aims to help all students access higher education, not just the ones for whom the system was built.</p> <p><a href="#">Back to top of comment 10.</a></p>		
11.	<p>The National Center for Transgender Equality (NCTE) welcomes this opportunity to provide the Department of Education with comment on its proposed revisions to the Free Application for Federal Student Aid (FAFSA) to thoroughly “assess the impact of its information collection requirements and minimize the public's reporting burden.” An estimated 1.4 million American adults are transgender.<sup>1</sup> The Department is proposing revisions to FAFSA’s gender reporting questions (FAFSA questions 21 and 22) that would unnecessarily burden and disproportionately impact transgender FAFSA applicants. Currently, question 21 of the FAFSA asks “Are you male or female?” Instructions appearing later in the FAFSA direct applicants to report their gender in terms of their sex assigned at birth”. The Department is proposing that instead of using the current language, “Are you male or female?”, that the question itself, which appears near the top of the FAFSA, be amended to read: “Were you born male or female?” While the Department may have drafted this language to provide clarification, such mandatory questions regarding an applicant's gender assigned at birth not only raises serious concerns under the Privacy Act of</p>	Harper Jean Tobin, National Center for Transgender Equality	<p>Recognizing that the sole purpose of Question 21 is to establish who is required to register with the Selective Service System, the Department of Education and the Selective Service have collaboratively determined that <i>Free Application for Federal Student Aid (FAFSA®)</i> applicants should contact the Selective Service System for official guidance if they are unclear how to respond. As a result, the following changes have been made: Question 21 has been changed back to “Are you male or female?”; Question 22 has been changed back to “<b>If female, skip question 23.</b> Most male students must register with the Selective Service System to receive federal aid. If you are male, age 18-25 and not registered, fill in the circle and we will register you. <b>See Notes page 9.</b>”; text in the “Notes for questions 21 and 22 (page 3)” section on page 9 has been changed to “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 (see <a href="http://www.sss.gov/Registration-Info/Who-Registration">www.sss.gov/Registration-Info/Who-Registration</a>). The Selective Service System and the registration requirement for males preserve America’s ability to provide resources in an emergency to the U.S. Armed Forces. For more information about the Selective</p>

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	<p>1974 (5 U.S.C. § 552(a)) but will likely cause unnecessary fear, confusion for transgender FAFSA applicants and, for some, make them reluctant to complete the FAFSA at all.</p> <p>We strongly urge the Department to work with the Selective Service System (SSS) and, as needed, the Social Security Administration (SSA) to clarify the requirements for Selective Service registration and the language of questions 21 and 22 in a manner that is consistent with the practice of other agencies and the realities of Americans' lives. To the extent that the Department is unable to work with SSS to meet this goal, we urge the Department to reword these questions in a gender-neutral manner or simply keep them as is.</p>		<p>Service System, visit <a href="https://sss.gov">sss.gov</a>. Forms are available at your local U.S. Post Office.</p>