

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
			<p>3. Other income to report an Alaska Permanent Fund dividend (Line 21 may not be less than 0)</p> <p>4. Educator expenses (Line 23)</p> <p>5. IRA deduction (Line 32)</p> <p>6. Student loan interest deduction (Line 33)</p> <p>If you filed a Schedule 1 and reported Additional Income or Adjustments to Income on any other lines of Schedule 1 other than one or more of these six exceptions, you must answer “Yes”.</p> <p>Similar updates are being made to the parent’s and student’s Schedule 1 questions and related help topics in the electronic FAFSA form. The proposed changes are documented in the Student Electronic Summary of Enhancements document.</p>
2.	3.	<p>Questions 35 and 82, Did (or will) you file a Schedule 1 with your 2018 tax return? would eliminate a lot of students who would have been eligible for the simplified formulas in 2019-2020 based on 1040A eligibility. This question effectively eliminates all Alaskan student from simplified formula eligibility, because the Alaska Permanent Fund dividend is reported on Schedule 1. Also eliminated would be anyone who received unemployment compensation, teachers who purchase school supplies from their own funds for their classrooms, borrowers who claim the student loan interest deduction, and people who make contributions to personal deductible IRAs.</p> <p>The simplified formulas, especially the Automatic Zero EFC variant, are designed to lighten the application burden on students who are most likely to fail to complete the application and who are most likely to fail to complete their educations due to administrative burdens. This question, though simple to understand and</p>	<p>3. Refer to response for comment number 1.2.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

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		<p>answer, would add complexity to many vulnerable student's applications and especially for formerly Auto Zero EFC eligible students, their verification requirements.</p> <p>Please consider one of these two alternative approaches. While I understand that the goal was to ask one, and only one question, asking two questions would get much closer to the old 1040A question while being relatively easy to understand.</p> <p>Did (or will) you file a Schedule 1 with your 2018 tax return? If you have filed or will file a Schedule 1, did you report any income on lines 10 through 21 other than unemployment compensation or Alaska Permanent Fund dividends?</p> <p>If the Department is committed to having one and only one question, then I suggest this question: Did (or will) you file a Schedule 1 with your 2018 tax return to report any income other than unemployment compensation or Alaska Permanent Fund dividends?</p>	
3.	4.	<p>There are two new questions #35 and #82. #35 for the student asks Did (or will) you file a Schedule 1 with your 2018 tax return? See Notes page 9. #82 for the parents asks Did (or will) your parents file a Schedule 1 with their 2018 tax return? See Notes page 9. I assume that these are to determine eligibility for the special Simplified Formula and/or Automatic Zero EFC. In previous years, one might qualify for the Simplified Formula or Automatic Zero EFC if they were eligible to file a 1040EZ or 1040A tax return (and also met other requirements), and generally did not qualify if they had to file a 1040. Schedule 1 includes many of the items that required form 1040 and would usually make a person ineligible for the two special formulas. Therefore, if one answers yes to question 35 or 82 I assume that they will generally not be eligible for the special formulas. However, the problem is that the new 2018 Schedule 1 also includes several items that previously could be reported on the 1040A that now might eliminate the special formulas eligibility for applicants who before the tax form revisions would have qualified. Specifically: Schedule 1, line 13, Capital gains only from distributions (no Schedule D required) could previously have been reported on a 1040A, line 10. Schedule 1, line 19, Unemployment compensation could previously be reported on a 1040A, line 13. Schedule 1, line 23, Educator expense could previously be reported on a 1040A, line 16. Schedule 1, line 32, IRA deduction, could previously be reported on a 1040A, line 17. Schedule 1, line 33, Student loan interest deduction could previously be reported on a 1040A, line 18. Therefore, since all the above now go on Schedule 1, anyone who received capital gains distributions, unemployment compensation, a teacher who paid for some classroom supplies, and anyone who made a deductible IRA contribution or paid student loan interest could automatically be denied the special formula when they did, or would have, qualified in the past. I would guess that could be a very significant percentage of low income applicants who previously would qualify, and that it is not desired to now exclude them. I suppose these items could be filtered for when transferring information from the IRS via the Data Retrieval Tool (DRT), but that could not be done for those unable to use the DRT or who file a paper</p>	4. Refer to response for comment number 1.2.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

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		FAFSA. A possible solution might be to expand questions #32 and #82 to specifically ask if there are entries that could not have been on the old 1040A. They might be worded as Did (or will) [you/your parents] file a Schedule 1 with your 2018 tax return that has any entries on lines 10-12, line 13 (only if with Schedule D required), or lines 14-18, 21, or 24-31a. Doing this, or something similar, would then consistently maintain the special formulas eligibility for 2020-21 vs. prior years.	
4.	5.	The question of "Do you have dependents other than wife or child" needs to be removed. Students/Parents can request the addition of adding dependents other than via the professional judgment route with appropriate documentation. The reason for this change would be to ensure that American tax payer money is truly going to students of need rather than being disbursed to students who did not truly understand the question or purposely misled the ED in order to obtain need based grant/loan funding.	5. No Change. This question is required by Section 480(d)(1)(G) of the HEA and is used to determine whether an applicant qualifies as a dependent or independent student. This element is needed to determine whether parental data must be supplied and, therefore, which sections of the form the applicant needs to complete.
5.	6.	The 2020-2021 FAFSA asks two new questions (#35 for student and #82 for parent) pertaining to the filing of Schedule 1 with the 2018 Form 1040. I assume that these questions will be used in part to determine eligibility for the simplified EFC formulas; however, this could eliminate populations of students who would have otherwise qualified with the 1040A. Applicants who file a Schedule 1 may be doing so for the following reasons, which were previously reported on the 1040A. Alaska Permanent Fund dividend Unemployment compensation Educator expenses (teachers who purchase classroom supplies from personal funds) IRA deduction Student loan interest paid Adding an additional question, or a clarifying statement to the current questions, could address this issue, effectively maintaining the simplification for which the formula is designed. Thank you for your consideration on this important matter.	6. Refer to response for comment number 1.2.
6. 6	7.	Suggestion: Making "Question Numbers" to the FAFSA more visible After a student submits their FAFSA, if there are any conflicting issues with their data, they receive a helpful comment on how to repair this (both from the FAFSA and FAAs). For some of these items, this feedback references a question number for direct viewing and repair. This feature is shown on the SAR and the ISIR, but not on the application that students have to navigate. Financial Aid Administrators also reference this when speaking to families. Can #'s be added to each question so students/families have an easier time navigating? The only "self service" method families have when locating the question number is to hover over each question and a "Help" box appears on the right that shows what # question they're looking at. Otherwise, they go line by line or make a "best guess" and search around. Searching for "Question 84" is faster than reading each question. This small adjustment save students some mental energy on what their issue is.	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> .
7.	8.	This is a comment not on the form itself, but the processing of it. When processing the FAFSA, an EFC should be calculated for those with a valid SSN and citizenship status of "neither citizen nor eligible non-citizen", rather than producing an invalid SAR. A simple comment code is all that we need to tell us the student did not pass the citizenship status test and is not eligible for federal aid until resolved. The reason to complete the FAFSA is to get an EFC and many schools use the results to award state, local and scholarship aid. An invalid ISIR with no EFC for these students causes time-consuming manual workarounds that may or may not be possible in all financial aid software systems.	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> .
1. 8.	9.	I am a tax professional and also moderated a FB page with 30,000 members that discussed topics including	9. Thank you for your comments.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	10.	<p>how to apply for financial aid. Members openly admitted intentionally putting incorrect information on the FAFSA and hiding money under the mattress - fraud! Please do NOT allow the acceptance of only paper tax documents for verification (tax returns, W-2s, etc), instead require the verification of the data with the IRS. These documents are too easily forged! Colleges that do not verify data and award federal financial aid in error should be liable to refund the error to the federal government.</p> <p>Also I support allowing the IRT to also pull a non-filer tax verification on the student if s/he says they did not file a tax return.</p>	10. Thank you for your comment.
9.	11.	I would like to suggest that you change the order of the options for Parent Marital Status, and move up "Unmarried and Living Together" and moved down "Never Married" and "Single." I'm finding that it is more common that parents of a child live together but are not married. However, when they see "never married" as an option first, they usually pick that and then proceed to only list one parent and one parent's information. If they were to see "unmarried and living together" as an option first, I believe more people would select that option if it applies to them and then correctly report BOTH parents.	11. 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> .
10.	12.	Question #30 regarding the degree or certificate a student is pursuing: Please provide additional description after "Graduate or Professional degree". Every year we have a large number of graduating high school seniors erroneously select Graduate or Professional degree causing them to become independent on the FAFSA when they should be dependent.	12. This change has been made as requested.
11.	13.	I would like question 58 to ask for the marital status of their supporting parent(s) or define this more clearly on the FAFSA when it is completed (not a weblink). This would help students to initially report the correct information. We seem to have many students who answer this question incorrectly since they believe it is in reference to the marital status between their biological or adoptive parents, not the current marital status of their supporting parent (who may be remarried).	13. No Change. The Department of Education believes the instructions and help text provide adequate guidance.
12.	14.	For line item 21-gender. This question should not be able to be left blank. It should prompt a message when continuing to the next page, that information is missing on line item 21. Please answer the question prior to proceeding. This would eliminate several comments codes associated with leaving this blank.	<p>14. No Change. An edit displays when this question is left blank, and reminds the applicant of the importance in answering this question. The purpose of the gender question is to identify those applicants who may be required to register with the Selective Service System. The Selective Service question only displays on the electronic FAFSA to those applicants who identify themselves as male and are under the age of 26. The question does not display when the gender question is left blank.</p> <p>Section 462(f) of the Military Selective Service Act requires a student to register with the Selective Service System to be eligible for federal student aid. While a Selective Service</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
			System match is required for all male students to determine federal student aid eligibility, an answer to this question is not required.
13.	15.	Please reword question #59 about parents' marital status to clarify that it is your custodial parent/parent you live with and not your natural or adoptive parents' status.	15. Refer to response for comment number 11.13.
14.	16.	I would recommend clarifying the question regarding grade level to be more specific that it isn't based on your year as in time in school but rather your actual grade level.	16. No change. The Department of Education believes the current question is clear. Schools have the responsibility to verify a student's grade level prior to paying a Federal Pell Grant.
15.	17.	Questions 35 and 82, Did (or will) you file a Schedule 1 with your 2018 tax return? would eliminate a lot of students who would have been eligible for the simplified formulas in 2019-2020 based on 1040A eligibility. Some impact populations include: any family that has received unemployment compensation, teachers who purchase school supplies from their own funds for their classrooms, borrows who claim the student loan interest deduction, and people who make contributions to personal deductible IRAs. In addition, Alaskan students will be excluded from simplified formula eligibility because the Alaska Permanent Fund dividend is reported on Schedule 1. The simplified formulas are designed to lighten the application burden for students, and this change will negatively impact vulnerable students who have previously qualified or would otherwise qualify.	17. Refer to response for comment number 1.2.
16.	18.	Can a line be added for students/parents to list any additional type of untaxed income on their FAFSA that is now NOT required to be put on their FAFSA? When the income is zero and no income listed elsewhere on the FAFSA, then we have to question the student or parents about income in their household...how do they support the family? This untaxed income that is normally not added to the FAFSA can be in a line item that does NOT affect the EFC# but will eliminate a hurdle for the students/parents of having to complete additional forms or submitting proof of source/amount of monies in the household.	18. No change. The primary purpose of the FAFSA form is to collect information from applicants and parents of dependent applicants to calculate an Expected Family Contribution. Applicants and their parents can add this information into field numbers 44h and 44i (applicants) and 92h (parents).
17.	19.	Because the Schedule 1 and 1040A/EZ eligibility list are not an apples to apples comparison, asking about inclusion of the Schedule 1 creates a situation where families in the following situations would be excluded from the Simplified Needs Test when they otherwise would have qualified and had qualified for the SNT in past years: those who take the student loan interest deduction, families who received unemployment compensation, teachers using their own funds to meet the needs of their classrooms and thus claiming the educator expenses deduction, and those who made deductible IRA contributions. My concern is that we're increasing the FAFSA application process burden for the most vulnerable populations.	19. Refer to response for comment number 1.2.
18.	20.	Suggestion 1 - Question 21 Are you male or female? Please consider rewording to: What was your gender assignment at birth? Many students are answering this question as how they currently identify themselves.	20. No Change. The notes for Questions 21 & 22 on the FAFSA form currently state: "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."

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	<p>21.</p> <p>22.</p>	<p>Suggestion 2 - Question 58: As of today, what is the marital status of your parents? I have seen many mistakes on the parents marital status. Many believe the question reads as: What is the marital status of your biologic/adoptive parents? Rewording this question and reordering the surrounding questions will help personalize the parent questions for better user experience and will increase correct data. Please see the new format below. Are your biological/adoptive parents married? Yes or No If yes, the FAFSA will tell the student to report information on both parents. If no, the FAFSA will direct the student to: Enter the name of the parent you lived with most during the last 12 months. The FAFSA will then ask the student: Is this parent married? Yes or No If no, the FAFSA will ask the student to report information on just this parent. If yes, the FAFSA will direct the student to enter the name of the stepparent and report information on both the parent and stepparent. If this is not possible for 20-21, please consider listing divorced and separated as two different options, not the same option.</p> <p>Suggestion 3 - When a student or parent report they will not file a tax return in question 32 or 79, skip to question 38 or 86, and the reported wages are over the income requirement to file U.S. taxes, the FAFSA will reject. Please consider having the FAFSA ask: Was this foreign income? Yes or No when the wages exceed the U.S. tax filing requirements. If yes, the FAFSA would not reject. Schools would request more accurate documentation for files selected for verification if this was indicated on the FAFSA. If no, the FAFSA would reject. Many families and FAAs are not aware that foreign income that is not taxed should be reported as untaxed income on FAFSA question 44h or 92h instead of wages.</p>	<p>21. 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>22. A reference to foreign income has been added to questions 44h and 92h on the paper FAFSA form, as well as to the help text for the electronic products.</p>
19.	23.	<p>Professional Judgment: The current process for reviewing applicants with special circumstances is a passive one, where college financial aid administrators respond to appeals for more financial aid. However, many low-income and first generation college students do not know to ask for a professional judgment review. Although the FAFSA does encourage applicants to consult with the colleges, this does not seem to be enough.</p> <p>Instead, please consider adding a question about whether the applicant is affected by special circumstances. This will help college financial aid administrators proactively identify applicants who might benefit from a professional judgment review. A possible question might be “Has the applicant or the applicant’s family been affected by special circumstances that affect their ability to pay for college, such as a significant change in income, benefits, expenses, assets or cash flow, or anything that differentiates the family from the typical family?”</p>	23. 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.
	24.	The reference to the tax filing deadline and estimated tax information is not entirely correct. Taxpayers can obtain an automatic six-month extension of the time to file a U.S. federal income tax return by filing IRS Form 4868. Given that the tax filing deadline for 2018 was April 15, 2019, these taxpayers will have until October 15,	24. No Change. The Department of Education considers these suggestions a stylistic preference.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>2019 to file their federal income tax returns. Although the FAFSA has an October 1, 2019 start date, most of these taxpayers will have filed their federal income tax returns by the time they file the FAFSA. As a result, these taxpayers should use actual tax filing information instead of estimated tax filing information. Accordingly, it would be best to replace the text “have missed the 2018 tax filing deadline of April 2019, and still need to file a 2018 income tax return with the Internal Revenue Service (IRS)” with “have not yet filed a 2018 federal income tax return with the Internal Revenue Service (IRS).”</p> <p>If you retain the current language, at least specify the actual correct tax filing deadline as “April 15, 2019” instead of “April 2019”.</p>	
	25.	<p>Under “Apply by the Deadlines” on page 1, the FAFSA refers to “high school guidance counselor” while under “Where can I receive more information on student financial aid?” on page 2 it refers to “high school counselor.” The FAFSA should use consistent terminology to refer to the school counselor.</p>	25. This change has been made as requested.
	26.	<p>The reference to “unusual circumstances” under “Filling Out the FAFSA Form” is inconsistent with the statutory language. The statutory language at 20 USC 1087tt refers to “special circumstances” and does not refer to “unusual circumstances.” The language “unusual circumstances” is used only in connection with a dependency override at 20 USC 1087vv(d)(1)(I). So, instead of using the term “unusual circumstances” it would be best to use the term “special circumstances” to be consistent with the language in the Higher Education Act of 1965.</p>	26. No change. While making this change is consistent with the statutory language, it doesn't improve the understanding or readability of the information for students and parents.
	27.	<p>The headings currently use the present participle (-ing). For example Applying by the Deadlines, Using Your Tax Return, Filling Out the FAFSA Form and Mailing Your FAFSA Form. The imperative form would be more effective, thus Apply by the Deadlines, Use Your Tax Return, Fill Out the FAFSA Form and Mail Your FAFSA Form.</p>	27. These changes have been made as requested.
	28.	<p>If the reference to “days” in the sentence “your SAR will be sent by e-mail within three to five days” is business days, the word “business” should be inserted before the word “days.”</p> <p>Also, it would be best to insert “to you (the student)” after “e-mail” because parents sometimes incorrectly believe that they will be the ones to receive the SAR.</p>	<p>28. No change. The reference is to calendar days and not business days.</p> <p>29. No change. Parents, in addition to the student, receive a SAR email if a valid email address is listed in FAFSA question number 68.</p>
	29.		
	30.	<p>The trademark notice at the bottom of the page, “The Federal Student Aid logo and FAFSA are registered trademarks of Federal Student Aid, U.S. Department of Education.” Is in 5-point type and is too small to be readable. The Federal Trade Commission requires legal notices to be in at least 6-point type and in the same</p>	30. This change has been made as requested.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		font size as the predominant text on a page. Many states have plain language statutes that require fine print to be even larger.	
	31.	Insert "Federal" before "Tax Return" in the heading to avoid confusion between federal and state income tax returns. Likewise, toward the end of the first paragraph, insert "federal income" before "tax return" in both places where it appears.	31. No change. The Department of Education believes the current instructions provide adequate guidance.
	32. 33.	1. Instead of using "FAFSA form" (which appears 34 times throughout the document), why not use just "FAFSA" to save space. After all, the "A" in FAFSA stands for "Application," so, including the word "Form" is a bit redundant. 2. Also, on the bottom, in the "Let's Get Started!" section, it refers to "application form" instead of just "FAFSA."	32. No change. In order to maintain their distinctiveness, trademarks should always be used as proper adjectives. Accordingly, the Department of Education uses the term FAFSA® form as part of our efforts to protect our brand and trademark. 33. This change has been made.
	34.	Recommend replacing "school or state aid" with "college or state aid" to avoid ambiguity concerning K-12 vs. postsecondary aid, under "Why all the questions?"	34. No change. The Department of Education considers this suggestion a stylistic preference.
	35.	Again, under "How much student financial aid will I receive?", replace "unusual circumstances" with "special circumstances" to be consistent with the statutory language.	35. Refer to response for comment number 19.26.
	36.	Given that there are 67 words about special circumstances on page 1 and 42 on page 2, perhaps the FAFSA could devote 109 or more words to special circumstances in a section that highlights special circumstances in the heading.	36. No change. The Department of Education believes the current instructions provide adequate guidance.
	37.	In the Privacy Act information, it lists the page numbers that are needed to apply for federal student aid: 1-9, 14-16, 18, 21-23, 26, 28-29, 32-37, 38-58, 60- 67, 69, 72-100, 102, and 103. Why are questions 32-37 and 38-58 listed as two separate ranges, instead of a single range 32-58?	37. These changes have been made as requested.
	38.	Questions #18 and #69 are not required to apply for federal student aid, and so should be omitted from the list. (They are, however, required to apply for state aid.) Question #30 is required to apply for federal student aid, since receipt of a first baccalaureate degree affects eligibility for the Federal Pell Grant. It may be	38. Regarding question #18 (Student's State of Legal Residence), Sections 475(g)(3), 476(b)(2), and 477(b)(2) of the HEA require this information to determine an allowance for state and local taxes for the computation of the dependent and independent

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>redundant with question 28, but that doesn't make it any less necessary. Technically, questions 60-63 and 64-67 are not required to apply for federal student aid, since a student's eligibility for federal aid does not legally depend on the identity or citizenship status of the student's parents.</p>	<p>student's available taxable income.</p> <p>Regarding Question #69 (Parents' State of Legal Residence), Sections 475(c)(1) and 475(c)(2) of the HEA require this information to determine state and other tax allowances for the computation of parental available income.</p> <p>Finally, question numbers 60 through 67 are required by Sections 483(a)(7) and 484(q) of the HEA. These are used by the Department to estimate erroneous Pell Grant payments as required by the Improper Payments Act, by matching against an IRS database each year.</p> <p>Also, valid SSNs are a criterion to use the IRS Data Retrieval Tool.</p>
	39.	<p>In the "Paperwork Reduction Act of 1995" section, why not replace "completed form" with "completed FAFSA" and "your application" with "your FAFSA."</p>	<p>39. No Change. The Department of Education considers these suggestions a stylistic preference.</p>
	40.	<p>In question 7, "Zip Code" is a trademark of the U.S. Postal Service and should be labeled as Zip Code™. See https://about.usps.com/strategic-planning/cs09/CSPO_09_001.htm.</p>	<p>40. No Change. The Department of Education's use of the term ZIP code is for informational purposes. In this example, providing notice of rights in unregistered trademarks is optional and does not require such trademark due to its usage for a federal application.</p>
	41.	<p>Is the month really necessary in questions 17, 20, 59, and 71? (71 may be necessary for state grant purposes.)</p>	<p>41. No change. Section 483(a)(1) of the HEA requires inclusion of data items selected in consultation with the states to assist the states in awarding state student financial assistance (Question numbers 17; 20; and 71).</p> <p>The month in question number 59 is used by the Department of Education to estimate erroneous Pell Grant payments as required by the Improper Payments Act, by matching against an IRS database each year.</p> <p>Additionally, marital status date is a criterion in determining student and parent eligibility to use the IRS Data Retrieval Tool.</p>
	42.	<p>Several states (including California, New York, Oregon and Washington D.C.) now allow non-binary genders on birth certificates. Although newborn children with non-binary gender might not file the FAFSA for another 15 years or so, some of the states allow individuals to amend their birth certificates to a non-binary gender. To forestall complications arising from this development, the U.S. Department of Education may wish to emphasize that the gender specified on the FAFSA should be the gender <u>originally</u> listed on the applicant's birth certificate, even if it has subsequently changed.</p>	<p>42. Refer to response for comment number 18.20.</p>
	43.	<p>The intention of questions 24 and 25 is to determine whether the student is a first generation college student. Since each state has a different definition of first generation college student, the FAFSA adopts the broadest definition (neither parent has a Bachelor's degree or more advanced degree), which lets the states and colleges</p>	<p>43. No Change. The responses to these questions have been carefully selected in consultation with the states since use of the responses varies by state.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>contact all students who are potentially eligible for financial aid for first-generation college students. However, the wording of the question is confusing for students, who might choose “College or beyond” for an Associate’s degree or certificate. Either the answer needs to change to “Bachelor’s or beyond,” a Note should be added, or the answer choices expanded to include Certificate and Associate’s Degree as options. If the response is that there is insufficient room to add more responses, consider that all definitions could be addressed by replacing the pair of questions with “Highest school completed by either Parent 1 or Parent 2,” which would free up enough room for additional answer choices.</p>	
44.		<p>Question 28 is necessary to determine eligibility for the Federal Pell Grant, since students who already have a baccalaureate degree are no longer eligible for the Federal Pell Grant. But, there’s overlap with question 30. Perhaps, the two questions could be combined in some manner through a clever wording change?</p>	<p>44. No change. Question #30 is required by Section 483(a)(1) of the HEA, which requires inclusion of data items selected in consultation with the states to assist the states in awarding state student financial assistance.</p>
45.		<p>In question #30, high school graduates often incorrectly choose “Graduate or professional degree” because they mistakenly think that a high school graduate is a graduate degree. Inserting the word “school” to yield “Graduate School or Professional School Degree” might reduce the error rate.</p>	<p>45. Refer to response for comment number 10.12.</p>
46.		<p>With regard to questions 35 and 82, the statutory language at 20 USC 1087ss(b)(3) specifies that the Simplified Needs Test applies only if IRS Form 1040 was not required in lieu of IRS Forms 1040A or 1040EZ. Strictly speaking, that would be the equivalent of the taxpayer not being required to file any of schedules 1, 2, 3, 4, 5. However, if one returns to the original intent of Congress, it was to exclude the possibility of the taxpayer artificially reducing adjusted gross income (AGI) below the \$50,000 and \$26,000 thresholds for the simplified needs test and auto-zero EFC, respectively. So, it would appear that Schedule 1 is sufficient for this purpose. However, Schedule 1 includes questions that are not necessary for this purpose and which did appear on the previous IRS Form 1040A or IRS Form 1040EZ, such as “Unemployment compensation,” “Educator expenses,” “IRA deduction,” and “Student loan interest deduction.” Surely it isn’t the intent of the U.S. Department of Education to penalize teachers who buy school supplies and textbooks for their students, people who lost their job, self employed individuals and student loan borrowers. Also, since Alaska Permanent Fund dividends are reported on Schedule 1, this would penalize all residents of Alaska, a violation of the equal protection clause of the U.S. Constitution.</p>	<p>46. Refer to response for comment number 1.2.</p>
47.		<p>In question 41 (and, later, question 89), applicants often get confused about whether retirement plan accounts are investments. Including retirement plan accounts in the answer to these questions is one of the most common FAFSA errors, with a significant impact on aid eligibility. Although the notes on page 9 do clarify this, it would be helpful to insert “and retirement plans” after “the home you live in.”</p> <p>It would also be helpful to mention that the retirement plan contributions on their federal income tax return are a form of untaxed income, since most families are unaware of this.</p>	<p>47. 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>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
48.		In the notes on page 9, it would be helpful to have a longer list of examples of qualified retirement plans, including 403(b) plans, Roth IRAs, Roth 401(k) plans, SEP and SIMPLE. Applicants often get confused about what is and is not a retirement plan.	48. Refer to response for comment number 19.47.
49.		Date arithmetic is challenging for many people. It might lead to an improvement in accuracy if question 45 were reworded as “Were you born in 1996 or before?”. Even “Were you born before 1997?” would be an improvement. The inclusion of the month and day (January 1) is a distraction that adds to the confusion.	49. No Change. The Department of Education believes the questions and instructions provide adequate guidance.
50.		The wording of the legal guardianship question, question 54, is not entirely accurate. A stepparent is considered a parent for federal student aid purposes only for as long as the stepparent is married to the parent. If the student is in a legal guardianship to the stepparent and the custodial parent dies, the legal guardianship should be sufficient for the student to be considered independent. This problem can be addressed by deleting “or stepparent” from the question. Note that the word “parent” is inclusive of “stepparent” for as long as the stepparent is married to the custodial parent, so the addition of “or stepparent” is not needed from a technical point of view. Of course, you may have added “or stepparent” in a colloquial sense, but then it conflicts with the technical sense.	50. No Change. The Department of Education believes the questions and instructions provide adequate guidance.
51.		In question #58, several of the possible answers overlap. In particular, “Never married” and “Divorced or separated” can overlap with “Unmarried and both legal parents living together.” If two options apply, the parents should choose the more specific answer, “Unmarried and both legal parents living together.” Accordingly, this answer should be listed first. Otherwise, parents who were never married might choose “Never married” even if they live together.	51. Refer to response for comment number 9.11.
52.		Question 68 refers to the parents’ e-mail address as a single email address, when parents may each have their own email address. If a significant number of parents try to enter two email addresses in the answer to	52. No Change. The Department of Education believes the instructions and help text provide adequate guidance.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		question 68, then change the wording to refer to “the email address for parent 1 or parent 2.”	
53.		In FAFSA on the Web, if the applicant answers question 58 as “never married” but indicates in the answer to question 81 “Married – filed joint return,” it should trigger an edit check, as the two statuses are inconsistent.	<p>53. No Change. On fafsa.gov, when these questions are answered “Never Married” and “Married – Filed Joint Return”, the following message displays: “You said that your <parent> is never married but you also said that your <parent’s> tax return filing status is married-filed joint return. If one of your responses is incorrect, change it now. If the information you entered is correct, make sure that the income information you provide on the following pages reflects only your <parent’s> 20xx income.”</p> <p>Similar messaging displays in myFAFSA when these questions are answered the same way.</p>
54.		The instructions in questions 73 and 94 are incomplete, as the college must be a Title IV institution per 20 USC 1087nn(b)(3), 20 USC 1087oo(b)(3), 20 USC 1087pp(a)(2) and 20 USC 1087qq(a)(3). For example, if the student’s sibling is enrolled at a foreign institution that is not eligible for U.S. federal student aid, the sibling cannot be counted in the number in college. This problem can be addressed by inserting “eligible” before “program” and “at a college or university that is eligible for U.S. federal student aid” after “college degree or certificate”.	54. 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.
55.		IRS Data Retrieval Tool . Married parents who file separate returns are currently unable to use the IRS Data Retrieval Tool. They represent approximately 5% of married parents. Likewise for parents who are divorced, separated or unmarried but live together. Since the FAFSA currently requests the name, Social Security Number and date of birth of both parents (questions 60-67), it is technically feasible to have each parent authorize the transfer of that parent’s federal income tax return data. It merely requires changes to the CPS to record and combine the separate income and tax data for each parent.	55. No change. The Department of Education and Internal Revenue Service will continue to explore ways to improve the IRS Data Retrieval Tool (IRS DRT).
56.		In questions 63 and 67, the year of birth is pre-filled with a 19. It is possible for a parent to have been born in the 21 st century, which would require the year of birth to begin with a 20. For example, if the student’s custodial parent remarried and the new spouse is very young, it is possible for the custodial parent’s spouse to have been born since January 1, 2000.	56. The update has been made to remove “19” from the paper FAFSA form.
57.		The sentences, “However, the order in which you list schools may affect your eligibility for state aid. Check with	57. No change. The Department of Education believes the current instructions provide

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		your state grant agency for more information.” are not very helpful for students, as the information is not easily accessible from state grant agencies. It might be better to simply give the advice to list an in-state public college first on the FAFSA in order to qualify for state grants.	adequate guidance in light of the different requirements for each state.
58.		Question 103 provides space for only 4 colleges. According to the 2016 edition of The American Freshman published by UCLA HERI, only 40.5% of freshmen in 2016 applied to four or fewer colleges. 92.5% applied to 10 or fewer colleges. Why not add another page to the FAFSA to allow students submitting the paper FAFSA to list up to 10 colleges, just as they can do on the online FAFSA?	<p>58. No Change. Department of Education research for the most recent year available (2017-18) shows that 77% of applicants list just one school on their <i>Free Application for Federal Student Aid</i> (FAFSA).</p> <p>8% list two colleges; 4% list three colleges; 3% list four colleges; 2% list five colleges; 1% list six colleges; 1% list seven colleges; 1% list eight colleges; 1% list nine colleges; and 2% list 10 colleges</p>
59.		Consistent with the criminal penalties in 20 USC 1097, the signing statement in Step Seven should be modified to add “for up to 5 years” after “sent to prison.” Mentioning the potential prison term may help reduce fraud rates.	59. Thank you for your comment.
60.		In the definition of “Net worth” in the notes for questions 41, etc. and in the definition of “Investment value,” the FAFSA currently uses language like “minus debts related to those same investments, businesses, and/or investment farms” and “investment debt means only those debts that are related to the investments.” The word “related” is a vague term that does not correspond to the statutory language at 20 USC 1087vv(g), namely “minus the outstanding liabilities or indebtedness against the assets.” In other words, Congress intended to subtract only those debts that were secured by the asset. Consider, for example, a family that uses a home equity loan on the principal place of residence to buy investment real estate. Since the home equity loan is not secured by the investment real estate, it does not reduce the net worth of the investment real estate. But, the vague wording in these notes, however, might cause some families to subtract it from the market value of the investment real estate because it is “related” to the investment real estate, even though it is not secured by it. Thus, the wording is contrary to the intent of Congress and common financial practices. (Note that in the discussion of business debt, the FAFSA does use the word “collateral.” The use of different terminology – “related” in one place and “collateral” in another – might also contribute to applicant	60. No change. The Department of Education believes the current instructions provide adequate guidance.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		confusion.)	
	61.	The definition of “investments” is missing “tax shelters,” which is mentioned in the statute at 20 USC 1087vv(f) (1).	61. No change. The Department of Education believes the current instructions provide adequate guidance.
	62.	The wording of the notes for question 52 with regard to orphans is vague and confusing. Consider two children, Alice and Bob, both orphans. Alice was adopted at age 12 and Bob at age 14. Alice is not considered an orphan, while Bob is. The wording of “You had no living parent, even if you are now adopted” will be confusing for Alice, since she will wonder whether parent means her biological parents or her adoptive parents. The statutory language is clearer. Perhaps reword it as “You were an orphan, even if you were subsequently adopted.”	62. Thank you for your comment.
	63.	In the notes for step four, second bullet. If a student's parents are divorced, each parent has remarried, and all four parents live together, which parents are responsible for completing the FAFSA? Jeff Baker, Director, Policy Liaison and Implementation, Federal Student Aid, never actually ever answered this question. I believe the custodial parent should be based on whichever parent provides more financial support and the non-custodial parent should be ignored even though they live together.	63. No change. Per the 2018–19 Application and Verification Handbook (AVG-31): “If biological or adoptive parents who are divorced still live together, their status is unmarried and living together and both would report their information on the FAFSA; see page 28. If one or both of them have married someone else and all live in the same household (and presumably the student lived with both parents an equal amount of time), the parent and stepparent, if applicable, who provided more support in the previous year would include their information on the FAFSA.” Schools may use PJ to account for the other parent’s financial contribution that is not already properly counted as child support on line 44c or money received on line 44j of the 2020–2021 FAFSA.
	64.	After “Federal Student Aid Eligibility (review checked boxes)” in the second paragraph it mentions grants but does not mention scholarships as a form of financial aid. Likewise, in the first checked box.	64. No Change. The Department of Education believes the questions and instructions provide adequate guidance.
	65.	In the second check box, it would be best to insert “college” before “financial aid office” so that the student doesn’t confuse the college financial aid office with their secondary school’s financial aid office.	65. No Change. The Department of Education believes the questions and instructions provide adequate guidance.
	66.	In just the SAR version, instead of stating “other sources of aid,” it refers to “grants, loans, work-study, scholarships and other sources of aid.” It would be best to list these types of aid in preference order, namely “grants, scholarships, work-study, loans and other sources of aid.”	66. This change has been made as requested.
	67.	On page 4 of the SAR it refers to Federal Perkins Loans with a 2020-2021 Award Year Loan Amount that is non-zero. The Federal Perkins Loan program expired in 2017, so there should be no amount listed as a current	67. No Change. The Department of Education believes the information provided in this section of the <i>Student Aid Report (SAR)</i> is adequate. The purpose of the draft SAR is to

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		award year loan amount.	display text that applicants will see, as well as sample data that may be included in the NSLDS section.
20.	68.	So many students apply to more than 10 schools and it can become very confusing for them to have to go back to the FAFSA to add more colleges. It would be very helpful to offer an unlimited number of colleges choices.	68. Refer to response for comment number 19.58.
21.	69.	Please consider adding the application year in the footer on each page of the paper/pdf version of the FAFSA. Our school services incarcerated students who can only submit the paper version.	69. This change has been made as requested. The cycle year has been added in the header of the FAFSA form, on the left side.
22.	70.	Questions 35 and 82, Did (or will) you file a Schedule 1 with your 2018 tax return? would eliminate a lot of students who would have been eligible for the simplified formulas in 2019-2020 based on 1040A eligibility. Some impact populations include: any family that has received unemployment compensation, teachers who purchase school supplies from their own funds for their classrooms, borrows who claim the student loan interest deduction, and people who make contributions to personal deductible IRAs. In addition, Alaskan students will be excluded from simplified formula eligibility because the Alaska Permanent Fund dividend is reported on Schedule 1. The simplified formulas are designed to lighten the application burden for students, and this change will negatively impact vulnerable students who have previously qualified or would otherwise qualify.	70. Refer to response for comment number 1.2.
23.	71.	Our comment is related to FAFSA Question #29, which asks, "What will your college grade level be when you begin the 2020-2021 school year?" The "Continuing graduate/professional or beyond" option is confusing for students and many of them choose it because they are high school graduates. They do not realize that they may be inadvertently stating that they have a Bachelor's Degree. It leads to many corrections on the part of the financial aid office and/or student, longer processing time, and additional applications selected for Verification. Perhaps this option could be reworded to say something such as, Pursuing a Masters, Doctorate, or Professional Degree, or, Pursuing education beyond a Bachelors Degree.	71. Refer to response for comment number 10.12.
24.	72.	Parents need to know that if they have been students with FSA IDs, they need to use the same IDs to sign their children's FAFSAs. That does not seem clear on the 2019-20 FAFSA.	72. A change has been made to the help text on fafsa.gov in response to this comment.
25.	73.	Please add the question asking if a student is eligible for the Children of Fallen Heroes Scholarship, otherwise it is close to impossible to identify these students on our campus. Thank you!	73. 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.
26.	74.	Instead of asking the student one question about parents' marital status, ask additional questions based on the student's initial answer. I will focus more on the web, not myFAFSA, but the concept is applicable for online and mobile instances.	74. 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

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>I also suggest that “Divorced” and “Separated” be separate answers. It helps with the logic questioning and allows FAA to more easily clear up questions regarding tax filing status issues.</p> <p>Current Web FAFSA version</p> <p>Students are asked “As of today, why is the marital status of your parents?” Students typically know if their birth or adoptive parents are married, so they do not think to click on the hyperlink of “parents” nor to click on the “?”.</p> <p>Suggested Change</p> <p>Question to be broken down into multiple questions based on how student answers the initial parent marital status question.</p> <p>Start with: What is the marital status of your parents (biological or adoptive)?</p> <p>Then use the answer to ask additional questions to lead the student to the answer and guidance they need.</p> <ul style="list-style-type: none"> ☒ If student answers “Married” or “Not Married but living together” <ul style="list-style-type: none"> o FAFSA will then tell student that both parents will need to be included on the FAFSA. ☒ If student answers “Widowed” <ul style="list-style-type: none"> o FAFSA will ask “Is your living parent remarried?” ☒ If student answers “Yes” <ul style="list-style-type: none"> ☒ FAFSA tells the student that the parent section including parent and stepparent’s information ☒ If the student answers “No” <ul style="list-style-type: none"> ☒ FAFSA tells the student to complete the FAFSA with living parent’s information ☒ If student answers “Divorced” <ul style="list-style-type: none"> o FAFSA will ask “Is the parent you lived with more over the last 12 months now remarried?” ☒ If student answers “Yes” <ul style="list-style-type: none"> ☒ FAFSA tells the student that the parent section including parent and stepparent’s information 	<p>the <i>Free Application for Federal Student Aid (FAFSA)</i> form.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>☒ If the student answers “No”</p> <p>☒ FAFSA tells the student to complete the FAFSA the one parent’s information</p> <p>☒ If student answers “Separated”</p> <p>o FAFSA will ask “Are your parents (or stepparent) still living together?”</p> <p>☒ If student answers “Yes”</p> <p>☒ FAFSA tells the student that the parent section including parents (or parent/stepparents) information</p> <p>☒ If the student answers “No”</p> <p>☒ FAFSA tells the student to complete the FAFSA with the parent who he/she lived with the most in the last 12 months on the FAFSA</p> <p>☒ If student answers “Never married, not living together”</p> <p>o FAFSA tells the student to complete the FAFSA with the parent who he/she lived with the most in the last 12 months on the FAFSA</p> <p>Please note: The language I’m using in the question is not suggested language. Take more note of how I suggest drilling down or the use of logic.</p>	
27.	75.	<p>The changes on the form asking if 1040A or 1040EZ was filed to if a Schedule 1 is filed does not reflect that the old 1040A form allowed to deduct IRA (Individual Retirement Account) contributions, Alaskan Permanent Fund, and Unemployment compensation. This should impact a lot of US citizens, and I doubt that was intended. Please rephrase the question to allow for at least these exceptions.</p>	75. Refer to response for comment number 1.2.
28.	76.	<p>Please add a question to determine if a student qualifies for the Children of Fallen Heroes designation, to assist states and schools in identifying this population.</p>	76. Refer to response for comment number 25.73.
	77.	<p>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>	77. 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> form.
	78.	<p>Questions 43c and f for student and questions 91 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</p>	78. 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

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		Federal Work Study, need-based employment portions of fellowships and assistantships, and work under a cooperative education program offered by a college.”	the <i>Free Application for Federal Student Aid (FAFSA)</i> form.
	79.	A number of State Grant Agencies use the Applicant Interface (API) to connect their state grant application to the FAFSA. For 2019-20 many applicants have been unable to utilize the API to connect with their state grant application due to the current build of the FAFSA only allowing the API link if the user has not blocked pop-ups on their device. Many applicants are unsure how to allow pop-ups for a site on devices such as smart phones. It would therefore be beneficial to applicants if the build of the FAFSA allowed the API link without requiring a pop-up for access to the state site.	79. 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> form.
	80.	In closing, PHEAA would like to thank the U.S. Department of Education (ED) for continuing to keep the order of school choices that a student provides on the FAFSA when delivering FAFSA information to State Grant agencies. PHEAA, as the administrator of the nation’s third largest need-based state grant program, recognizes that this is the optimal application process for low-income students who benefit the most from Pennsylvania State Grant dollars. We request ED to maintain the current method of transmitting school choice information to state grant agencies in future years as well.	80. Thank you for your comments.
29.	81.	There are major disconnects and it is highly confusing regarding submission status for students without documented parents that need signature pages. Even I, a professional in the industry, was tricked by it. Students are prompted to print, sign and mail a signature page and then exit the form. Nowhere does it mention that the FAFSA is not actually submitted and that they must go back and submit without signatures. This caused many issues for my most vulnerable students who thought (as did I) that they had completed everything and we were just waiting for FSA to process the signatures, but in fact, the system cleaned many of their applications out completely after 60 days. Something about this process needs to change. Add some steps in the circumstances of needing to mail in signatures (i.e. a "would you like to submit your FAFSA now without signatures while they are in the mail and being processed? This helps you ensure you meet any state, school or federal deadlines" with a submit button after selecting to print the signature page).	81. No change. Once the parent or student prints and signs the signature page and then clicks on the “Close” button he or she is returned to the “Signature Status” page where the instructions at the top of the page state: “Your application is ready to submit. Click Submit My FAFSA Now and mail in your signature page as soon as possible.” After seven days, if the completed, saved FAFSA form has not been submitted, the applicant will receive an email (if an applicant’s email address was provided) reminding them that they should return to fafsa.gov and submit their FAFSA form.
	82.	Please add a better or more descriptive option for citizen students with undocumented parents who DO file taxes. It is confusing when they are required to select Foreign Tax Return - when they do file a 1040 etc. with their ITIN.	82. No change. Undocumented parents are not required to select “Foreign tax return.” They should select the type of tax return that corresponds with the type of tax return that was filed. When an undocumented parent provides all zeroes for the Social Security number field and indicates that he or she filed a tax return that is not a foreign tax return, an edit triggers prior to submission of the FAFSA form. If the parent did file a U.S. tax return, they will need to confirm the edit and proceed with submitting the FAFSA form.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
30.	83. 84. 85. 86.	<p>1. The male/female question should be mandatory, if it is not already.</p> <p>2. Please do not allow families to bypass asset questions when they qualify for simplified needs. Often during the verification process, corrections are made that now make these questions required and the corrections will not be processed without it being entered. It is an additional burden to gather this information after the fact.</p> <p>3. Please add a reference throughout the application as to who is parent 1 and who is parent two. I have worked with families that as they progress through the online application, they don't remember which parent they listed first. Even if it just showed the last four digits of the SSN on future screen with the parent 1/parent 2 reference.</p> <p>4. We have frequently seen the parent tax information being input again as the students tax information due to the fact that it skips around and asks the students information at the end. I know that the wording is such because it is the student's FAFSA, but because often the parent is filling out sections on the student's behalf, they seem to get confused about adding "your" tax information. Perhaps the student income section could more specifically and more often reference adding the "student" tax information.</p>	<p>83. Refer to response for comment number 12.14.</p> <p>84. No change. The ability for applicants to skip assets is a result of the FAFSA simplification effort, in order to decrease the number of questions that need to be answered. When the assets are not required in the EFC calculation, the student or parent is given the option to skip them.</p> <p>85. No Change. The Department of Education believes the instructions and help text provide adequate guidance.</p> <p>86. No Change. The Department of Education believes the instructions and help text provide adequate guidance.</p>
31.	87.	<p>The proposed changes indicate that any student or parent completing a Schedule 1 will be ineligible for the Simplified Needs Test and the Auto-Zero EFC. This means that Alaskans will be ineligible for the SNT and Auto-Zero formulas, which will lengthen the FAFSA application by adding in asset questions for the student and parent. Recommendation to fix the limitation of the SNT and Auto-Zero: 1. Change the wording of the proposed question to "Did you file a Schedule 1 for purposes other than the Alaska Permanent Fund Dividend or unemployment compensation?" 2. Change the determination for SNT and Auto-Zero formulas to be determined by the completion of any additional forms other than Schedule 1 (Schedule 2, 3, 4, 5, 6 and letters). Any individual with business losses or gains will need to submit supplemental schedules in addition to Schedule 1 (Schedule C or D), so these students would get the additional questions, while those that are only filing a Schedule 1 because of unemployment or the Alaska PFD would remain eligible for the simplified form.</p>	<p>87. Refer to response for comment number 1.2.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
32.	88. 89. 90.	<p>1. Change the high school name selection to be from a drop box rather than an option to type, unless their high school is unavailable. This error can make data very messy for those trying to deal with student-level data. This will improve FAFSA completion data provided to states.</p> <p>2. Increase use and access of the IRS DRT by allowing parents with ITINs to use the IRS DRT to transfer tax data into the FAFSA. In addition, provide address flexibility in the DRT.</p> <p>3. Re-introduce the question about if a student is a high school senior. This question will allow for data to be more easily tracked for high schools, college access personnel, and first-year services. Tracking student-level information based on birthdates is inaccurate and students end up being omitted from student-level data or included when they should not be for our high school partners.</p>	<p>88. Thank you for your comment. The process for answering FAFSA question #27 was designed as a result of usability testing. The Department of Education will review the current design to determine if improvements can be made.</p> <p>89. This comment has been referred to the appropriate agency.</p> <p>90. No change. The intent of the FAFSA form is to determine student eligibility for federal grants; work-study and loans.</p>
33.	91. 92. 93.	<p>We suggest the following changes to facilitate FAFSA submission:</p> <p>1) Make it easier to use the IRS DRT by loosening the criteria for the text to match exactly as it appears on the tax return. As it is now, students have to type in the text exactly as it appears on the tax return. It is cumbersome in that students sometimes have to make multiple attempts to match the text. And quite a few are unable to use the DRT simply because the text doesn't match.</p> <p>2. Also, the error message that appears does not provide helpful instruction as to how to remedy the issue. Loosening the requirement to have the text match exactly will save students time by having information directly transferred into the FAFSA and can save them from lengthy verification processes later. The DRT is intended to be a helpful tool but it's currently set up in a way that makes it hard to use.</p> <p>3) The change in the tax forms may create an issue as it relates to information transferring from DRT onto the FAFSA form. It is absolutely essential that this transfer of information is seamless to ensure students are able to maximize the use of a tool that is supposed to simplify the FAFSA process. Otherwise, they may end up</p>	<p>91. This comment has been referred to the appropriate agency.</p> <p>92. This comment has been referred to the appropriate agency.</p> <p>93. Thank you for your comment. The IRS DRT will continue to retrieve the required information from the new IRS tax forms into both fafsa.gov and myFAFSA..</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		spending time typing in financial information themselves and later being required to complete the verification process, which can be a barrier to enrollment. We know that the verification process can be a lengthy and complex process that requires low-income families to submit an inordinate amount of paperwork that is difficult to obtain. Our students and their families rely on financial aid to pursue college and we should work diligently to make an already complicated process as simple as possible.	
34.	94.	1. It is really important that the data retrieval tool works even with the new tax forms. Over half of the students in the High School I work in needed the data retrieval tool because their parents lost the tax forms, it took weeks to get the forms to the students then to school so the student could answer that portion of the FAFSA, or they were selected for verification.	94. Refer to the response for comment number 33.93.
	95.	2. Please make entering the high school name simpler. All the students I helped would just type the name of our high school without verifying that they typed it correctly (until I told them to go back and back sure they search and select a high school). Since the name of my high school is more complicated, none of them would type it correctly as it is typed in the FAFSA. Forcing students to search by not even giving them the option to type the name sounds good. Or having options come up as they type would be helpful as well.	95. Refer to the response for comment number 32.88.
	96.	3. PLEASE make entering the address on the DTR easier! A number of my students do automatically enter spaces at the end - which makes it not match. And a number of my students have moved, so for them to remember which address they lived at 2 years ago, and type it in exactly as it was on the taxes is a long and discouraging process. It already has often taken the student a long time to get to this step, and to make it take longer is frustrating and discouraging for the student.	96. This comment has been referred to the appropriate agency.
	97.	4. Could you make it easier to parents to make FSA ID's if they don't have an email? Maybe 10-20% of parents at the school I work at don't have email addresses or change their phone number. Could the FSA ID just be tied to the social security number, at least for parents? So if they forget their account information, they can type in their social, and then reset their password and/or username.	97. This comment has been referred to the appropriate business unit.
	98.	5. Could the FAFSA be offered in more languages? I have a number of students that's first language is Somali or Arabic but so far the FAFSA is just offered in English and Spanish. Thanks.	98. This comment has been referred to the appropriate business unit.
35.	99.	1. I suggest that FAFSA eliminates the reminder that students can file for state grants. I think this appears somewhere on the first page after students log in. It's confusing and misleading because students actually don't have to fill out a separate application for Cal Grants. Even though I explain to parents and students that FAFSA is the "one stop shop" application for financial aid, because of these reminder on FAFSA, they always ask	99. No change. Fafsa.gov displays a reminder at the top of the "Student Residency" page that states: "You are eligible to transfer your FAFSA information into <State's> state student aid application. Use the Start your state application link on the FAFSA confirmation page to transfer your information. Note: This feature is only displayed once

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	100.	<p>if there is a second application to be filled out! Reminder like this would be more useful: " FAFSA application will also be used to determine your state grant award" or something like that.</p> <p>2. For some reason, parents and students are usually confused (especially first generation college students) when filling out "income", and "income tax " amount. They put the same amount for both questions. Maybe the second question would ask "amount of tax paid" instead of "income tax paid". I know the latter term is correct and precise, but for a lot of second language students who are also mostly first generation college, they couldn't tell the difference, and just see "income".</p>	<p>on the confirmation page after submitting your FAFSA.”</p> <p>This message is only displayed on the residency page for students whose state of legal residence participates in the transfer program. 100. No change. When a parent or a student enters the same amount for both adjusted gross income and taxes paid an edit message is displayed instructing them to correct one of the amounts.</p>
36.	101. 102. 103.	<p>101. IRS DRT - We have assisted with FAFSA completion for many years and the IRS data retrieval tool has been a great advantage and improvement for students to simplify data entry (with accuracy) and often allows them to bypass a complicated verification process. With the new tax return, we hope that all of the data will still transfer from the IRS. For many students with whom we work, matching their identity for IRS data retrieval is often difficult. Their address on the tax return or name on the tax return has changed from the prior-prior year. If we are lucky enough to be holding a copy of the tax return, retrieving IRS data is often simple. However without the copy, it can be difficult to pull the data: the tax filer didnt type the name correctly, or put the address as a Court instead of Drive, or the family moved and cant remember what address they used.</p> <p>102. High School name selection: Students should only be given the option to type the high school name in the FAFSA if they cannot find their school on the list, and then they should be required to hit "confirm". This will greatly improve the high school FAFSA completion data match provided from Federal Student Aid to the states. Our counselors in Mississippi use the student level data to inform them on who has and has not completed the FAFSA and/or our state grant application. The high school name creates the biggest issue for getting the data to attach to the correct high school. Our staff provide FAFSA training across the state and we are finding that even those who consider themselves to be experts have missed this step. Confirming the name is a step that is very easy to miss with the current application.</p> <p>103. FSA ID While FSA ID creation may be easy, there are many students and parents who cannot get into their FSA ID after creation. I consider my team experts at untangling FSA IDs and we can share a host of information about issues with the FSA ID and some better solutions to improve the FSA ID system. For example, we work with low-income, first generation students and find that your choices for questions are often not applicable. In addition, the new requirement for having a verified email is a barrier for students and parents who do not have an email or might share a family email. If you are looking for comments on the FSA ID process, I would be happy to share examples for improvement.</p>	<p>101. Thank you for your comments. Your comments about the IRS DRT have been referred to the appropriate agency.</p> <p>102. Refer to response for comment number 32.88.</p> <p>103. This comment has been referred to the appropriate business unit.</p>
37.	104.	<p>I think it is a good idea to add some sort of color or formatting changes for the section for parent information since I feel that it was clear before when they were on one section versus another but not with the new</p>	<p>104. No Change. The Department of Education has made and continues to make substantial changes to the look and feel of fafsa.gov to streamline the user experience.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		changes this year.	These design improvements are based on usability studies and web design industry standards to maximize the digital customer experience.
38.	105.	1. IRS Data Retrieval Tool (DRT): It is very important that the IRS DRT process be updated to reflect changes to the federal tax returns. The availability of the IRS DRT has resulted in making the FAFSA both easier to complete and making sure the information that families are providing is accurate. Additionally, the hope is that by transferring data directly from the IRS, fewer students will be selected for verification. We lose far too many students as a result of verification melt between 20 25% here in Maine. One challenge with the IRS DRT, though, is that a student must EXACTLY match the address on the DRT to the tax return. Simple mistakes can easily prevent students from using the DRT. Capitalization, adding a space at the end of the address, and common abbreviations (e.g. ST for street) should be included matches if the social security numbers also match. This will improve DRT usage rate and make FAFSA verification easier as well.	105. Refer to the response for comment number 33.93.
	106.	2. Simplified Needs Test (SNT): Given that there are no longer tax forms 1040A and 1040EZ, our understanding is that the new trigger question is to ask if a student or parent filed a Tax Schedule 1. If yes, the individual will not be eligible for the SNT. This will be confusing for families and unnecessarily eliminate families who really do meet the SNT objective. It is important that additional language be added or that a follow up question be added asking if the Schedule 1 was only filed due to unemployment compensation. If yes, the individual would still be eligible for SNT.	106. Refer to response for comment number 1.2.
	107.	3. High School Name Selection: Students should be asked to select a school from the drop box and only given the option to type the name in if they cannot find their school. Additionally, students should be required to hit "confirm" to ensure the box is not left empty. This will greatly improve the high school FAFSA completion data provided from Federal Student Aid to the states.	107. Refer to response for comment number 32.88.
	108.	4. Add a free form box where students can provide additional information or indicate that their situation no longer reflects the financial information on the FAFSA. Students should be instructed to contact the financial aid office, but this would give the financial aid office a heads up and allow them to be proactive.	108. 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.
39.	109.	Thank you for this opportunity to comment regarding the draft 2020-21 draft FAFSA. The Alaska Commission on Postsecondary Educations (ACPEs) understanding of the proposed changes is that subsequent to the elimination of the 1040EZ and 1040A, the new IRS Schedule 1, used to report additional income, would trigger the disqualification of a FAFSA filer from the simplified needs test (SNT) or Auto-zero EFC. It appears that if a FAFSA filer answers yes to questions 35 (for the student) and 82 (for the parent), the filer would no longer be eligible to complete the FAFSA SNT or qualify for the Auto-zero. This may create a significant challenge for certain Alaska FAFSA filers. It would place all Alaskans who receive an annual Alaska Permanent Fund Dividend (PFD) payment in a category that would require them to forego access to the SNT or Auto-zero, regardless of	109. Refer to response for comment number 1.2.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>income or assets. The Alaska PFD is an annual payment to Alaska residents, designed to allow all Alaskans to share in a portion of the states minerals revenue. IRS rules require the PFD to be reported on a Schedule 1. Requiring that low-income Alaska PFD recipients forego the opportunity to complete the FAFSA SNT or Auto-zero solely because they have received an Alaska PFD would mean that Alaskas most vulnerable students would have to complete more FAFSA questions, many of which simply would not apply. ACPE does not have a way to measure the impact of this proposed requirement to Alaska FAFSA filers. However, ACPE staff who work directly to assist low-income students with FAFSA filing have concern that it may become more challenging for these students to complete the FAFSA, possibly resulting in some drop-off and/or increased verification. This is not to say that only low-income Alaskans may be impacted; there are other Alaska (and national) populations that may also be impacted. However, the population of low-income Alaskans who receive PFDs is one population that ACPE regularly serves with FAFSA completion assistance. Potential solutions include changing questions 35 and 82 to ask if the Schedule 1 was filed for purposes other than to report an Alaska PFD, or eliminating Schedule 1 as the determining factor in SNT or Auto-zero eligibility, or providing that only those items reported on Schedule 1 that were not previously reportable on a 1049A are considered. Thank you for your consideration of this unintended FAFSA complexity for Alaskas low-income students.</p>	
40.	110. 111. 112. 113.	<p>Glitches There are two primary glitches with the FAFSA and they account for about 50% of the calls I get from parents about FAFSA. The first is if you press enter instead of clicking next on several pages of the FAFSA, it crashes and makes you log back in. One of the places this happens is after entering the security code immediately after starting the FAFSA. The other glitch involves the school selection page. After the student types in their school information, if they select "next" instead of "search," the FAFSA crashes and they have to log back in.</p> <p>IRS DRT I have never been able to get the DRT to work for students who have PO boxes or apartment numbers in their addresses. Even when we had the tax return and put it in exactly as it appeared on their tax return, we were unable to get the DRT to work.</p> <p>FSAID Security FSAIDs are EXTREMELY difficult to recover and I have spent hours on hold with tech support for them. I understand they protect a lot of personal information, but if the student (or more typically, parent) forgets to verify their email address, it can take hours to recover an FSAID. I also had a parent and a student who hadn't verified an email or phone number and couldn't answer their security questions. They had to wait over a week to reset their FSAIDs and neither finished the FAFSA.</p> <p>Error Messages I have had a few students whose FAFSA didn't go through due to errors with social security numbers or tax information. The FAFSA error messages are not specific enough and I have to spend way more time than should be necessary trying to figure out what went wrong.</p>	<p>110. No change. If a potential issue is discovered, the Department of Education requests that it be reported to the appropriate help desk so the issue can be logged, researched and resolved. If an applicant, parent or school financial aid administrator discovers a potential issue with the FAFSA, they should contact the Federal Student Aid Information Center (FSAIC) at 1-800-433-3243.</p> <p>111. This comment has been referred to the appropriate agency.</p> <p>112. This comment has been referred to the appropriate business unit.</p> <p>113. Refer to response for comment number 40.110.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
41.	114. 115. 116. 117. 118. 119. 120. 121.	<p>As always, the process of obtaining/retrieving the FSA ID is of concern. When a student is locked out, they have to wait for an email from FAFSA requesting that they send a copy of their photo ID for verification. They cannot submit the photo ID without the email request. That email does not always come. The student then has to call FAFSA again to start the process all over again.</p> <p>The series of questions that asks for the number of people in the household is often times confusing to students it is not written very clearly. It seems as though students often end up with an incorrect number of individuals in the household. There should probably be just one question as opposed to the series.</p> <p>1. Retrieving passwords; The lockout time is too long (30 mins) Students have to wait 30 mins to log in their account after they reset their password.</p> <p>2. When students/ parents cannot access email that they used for the FSA ID, the first step is to call FAFSA which takes a while to speak with a representative (depending on the time of year & day). After speaking with the representative they make the students/parents do varies steps before they will allow the individual to get the email to verified their identity.</p> <p>3. Verifying identity takes 7-10 business days when parents/students do not have access to their email, username or forgot password. (too long) when it only takes 3 days to process your FASFA.</p> <p>4. The IRS data retrieve tools will not allow parents who file married but separate to link back to the FAFSA application.</p> <p>5. Sometimes the IRS does not link parents/students information even with all the correct filling status, address, and birthday.</p> <p>6. When parents who has a language barrier contact the FAFSA to retrieve their log in information its difficult for them because the representatives do not allow either an advisor or the student to translate for the parent. (Should have accommodations for people who speaks other languages/ dialect).</p>	<p>114. This comment has been referred to the appropriate business unit.</p> <p>115. Thank you for your comment. This series of questions was added to the electronic applications as a result of usability testing. It was determined that using a series of questions to narrow down the response would provide the most accurate response. The Department of Education will look at the wording of these questions to determine if improvements can be made.</p> <p>116. This comment has been referred to the appropriate business unit.</p> <p>117. This comment has been referred to the appropriate business unit.</p> <p>118. This comment has been referred to the appropriate business unit.</p> <p>119. If the student and/or parent are married they are required to include their spouse's tax information. The tax return information transferred from the IRS Data Retrieval Tool is masked; therefore, the student and/or parent is unable to add their spouse's tax return information. The Department of Education provides instructions and help text to aid married but separate filers in reporting their financial information.</p> <p>120. This comment has been referred to the appropriate agency.</p> <p>121. This comment has been referred to the appropriate business unit.</p>
42.	122.	Submission Date: Please add a pop up box that initiates after the student has chosen which their academic year. Ex. Your FAFSA must be submitted by June 30, 2019 in order to be considered for financial aid. Hopefully	122. No Change. The Department of Education believes the instructions and help text provide adequate guidance.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		this will encourage students not to wait too late to complete their FAFSA.	
43.	123.	Good afternoon! I have a few comments regarding the 2020-2021 and changes that I think would improve it. I find that when I work with students/families filing the FAFSA, the most frustrating part is using the DRT. I have a number of families who are typing in the address, but because it isn't exactly like it is on their tax return it doesn't work. I think there needs to be more flexibility in this part of the application and using the DRT.	123. This comment has been referred to the appropriate agency.
44.	124.	1.Instructions page - Clean up - make Next button more prominent.	124. No Change. The Department of Education believes the instructions and help text provide adequate guidance.
	125.	2.Program FAFSA to pull in students middle initial with the rest of demographics from FSA ID registration.	125. 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> form.
	126.	3.When student or parent last name is too long to fit in the space provided it messes up IRS data retrieval if its not caught that the name doesnt match the tax return. (make last name space longer)	126. 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> form.
	127.	4.If student accidentally hits the enter key anywhere on the FAFSA it kicks them out of the application.	127. Refer to response for comment number 40.110.
	128.	5.Create a second box/line to enter/confirm parent email address so if flows on the page.	128. No change. Currently, parents who provide an email address on fafsa.gov or myFAFSA are prompted to confirm the email address they provided.
	129.	6.Create better / visual instructions on parent demographic page says (DO NOT) use ITINs.	129. A change has been made to the notes on page 9 of the paper FAFSA, as well as to the online help text in response to this comment.
	130.	7.When choosing who student lives withenhance auto fill to gender neutral - parent 1 or 2 vs father or mother.	130. 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> form.
	131.	8. Can brief instructions be created on parent income page to address separating taxing in the case of divorce or death.	131. No Change. The Department of Education believes the instructions and help text provide adequate guidance.
			132. Thank you for your comment. The design of the household size page was the result

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	<p>132.</p> <p>133.</p> <p>134.</p> <p>135.</p>	<p>9. Calculating household size page - is confusing for students/parents.</p> <p>10. Enhance the option to print signature page(Reduce 7 clicks to 1 click).</p> <p>11. Confirmation page omit option to expand/collapse page students/parents miss the Pell eligibility and close the page.</p> <p>12. Fix multiple sibling option on confirmation page(do you have siblings who need to compete with same parent information) rarely works; and doesnt successfully pull in IRS data retrieval without error message at the end of the second FAFSA.</p>	<p>of usability testing. It was determined that this design resulted in the most accurate responses being provided. The Department of Education will continue to assess the household size page to determine if additional improvements can be made.</p> <p>133. 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> form.</p> <p>134. Thank you for your comment. The design of the confirmation page was the result of usability testing. It was determined that this design resulted in the best opportunity for students and parents to review the data presented on the confirmation page.</p> <p>Once the student reaches the confirmation page a version of this page is emailed to the student if the student has provided a valid email address. This email contains information on the student's Pell Grant eligibility.</p> <p>The Department of Education will continue to assess the confirmation page to determine if additional improvements can be made.</p> <p>135. Refer to response for comment number 40.110.</p>
45.	<p>136.</p> <p>137.</p> <p>138.</p>	<p>1. AFFIRM THAT DATA RETRIEVAL TOOL FIELDS WILL TRANSFER: Tax information from the new individual tax forms will transfer seamlessly to the FAFSA. If the tax fields do not transfer, this will cause students and families delays in completing their financial aid forms and could cause data transcription errors.</p> <p>2. FILTER QUESTION FOR SIMPLIFIED NEEDS TEST: Include additional language or a follow-up question to the new trigger question for the Simplified Needs Test (SNT). The SNT will ask if a student or parent filed a Tax Schedule 1. If yes, they will not be eligible for the SNT. However, students/families who filed a Schedule 1 ONLY due to unemployment compensation or the Alaska Permanent Fund should remain eligible for SNT. Additional language or a follow-up question will help the neediest families complete their FAFSA without providing complicated financial information.</p> <p>3. CHANGE HIGH SCHOOL NAME SELECTION: One of the biggest challenges we face in working with students is how they enter the name of their high school. If students had to choose from a drop-down list, be given the</p>	<p>136. Refer to the response for comment number 33.93.</p> <p>137. Refer to response for comment number 1.2.</p> <p>138. Refer to the response for comment number 32.88.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	139.	<p>option to type the name in if they cannot find their school, and had to hit a confirm button if the box is left empty, it would significantly speed up the process and expedite data reporting.</p> <p>4. ADDRESS FLEXIBILITY IN THE DATA RETRIEVAL TOOL: Currently, a student must EXACTLY match the address on the DRT to the tax return. Simple mistakes can easily prevent students from using the DRT. Capitalization, adding a space at the end of the address, and common abbreviations (e.g., ST for street) should be included matches if the social security numbers also match. This will improve DRT usage rate and make FAFSA verification easier.</p>	139. This comment has been referred to the appropriate agency.
46.	140.	<p>Recommendation Allow for variances between courts and states to accommodate other terminology that is interchangeable for Legal Guardianship Statutory Citation Dependency status defined: HEA Sec. 480 (d) Current law allows a student to be independent (i.e., not provide parental information on the FAFSA) if the student is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individuals State of legal residence. The term legal guardianship has been narrowly defined to include this term only and excludes legal custody, care, custody, and control, and other terminology used in various jurisdictions. Different states and courts use different terms to mean that a child has been removed from his/her parents home and placed in the care of a third party. For example, legal guardianship is most commonly used in probate court, and legal custody or care, custody, and control are more commonly used in family court. All of the terms, when used in this context, mean that a child is no longer in the care of his/her parents by court order. We understand why the term legal guardianship was chosen over legal custody as legal custody is also used in divorce proceedings to indicate with which parent minor children will primarily live. However, the same term is used by many states and courts when a child is removed from his/her parents home and placed in the care of a third party. We feel that the intent of the law was to allow for children who have been removed from their parents by order of the court to be independent for federal aid purposes. The narrow use of the term legal guardianship places an unnecessary burden on students whose state or court did not use this term when removing them from their parents care. These students are forced to pursue a dependency override, which typically requires additional paperwork beyond the submission of a court order and must be done annually. This additional paperwork is an unnecessary burden on a disadvantaged child who likely has experienced significant trauma. Please consider clarifying the instructions for independent status to define legal guardianship as the removal of a child from his/her parents and placement in the care of a third party by a court of competent jurisdiction in the individuals State of legal residence.</p>	140. No change. The Department of Education does not have the authority to formally interpret the language “legal guardianship” as “legal custody” or other wording. Institutions must contact their legal counsel for an interpretation of the State law where the student lives regarding custody and legal guardianship and if the student is eligible, the institution could choose to do a dependency override. Your comment has been referred to the appropriate business unit for further discussion.
47.	141.	I was a high school counselor who helped students file FAFSA and helped to track completion rated for my school. Students should be asked to select a school from the drop box and only given the option to type the name in if they cannot find their school. Additionally, students should be required to hit "confirm" to ensure	141. Refer to the response for comment number 32.88.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		the box is not left empty. This will greatly improve the high school FAFSA completion data provided from Federal Student Aid to the states. So many students are a "partial match" due to different addresses or information that the school specific data is completely inaccurate.	
48.	142.	As a former school counselor, I find mandate of this bill completely violates choice and privacy. What is the true agenda? I know you wish to give aid to all and ensure they are submitted on time, but can't there be a scholarship or grant offered to anyone who submits by January 1 of the grad year instead? Why mandate private information like this? Not everyone will use it. Not everyone qualifies. This must be left to the private choice of parents/the student and permit school districts to promote the best they can. When I was school counselor I had 80% completion thanks to my efforts. It was a small school, so that meant 8 didn't complete (military, workforce, etc). We built in incentives and prizes. Please do not push this bill through.	142. Thank you for your comment. The completion of the FAFSA is voluntary. However, the Department of Education encourages all eligible applicants to file the FAFSA form to understand their eligibility for federal aid. ED works diligently on the form to ensure that the minimum data is required to calculate any eligibility for federal aid to attend eligible post-secondary institutions. The time frame requirements are tied to funding and other regulatory requirements.
49.	143.	The Achieving a Better Life Experience (ABLE) Act of 2014 allows states to create tax-advantaged savings programs for eligible people with disabilities (designated beneficiaries). Funds from these 529A ABLE accounts can help designated beneficiaries pay for qualified disability expenses. Distributions are tax-free if used for qualified disability expenses. Section 103 of the Act specifies the treatment of ABLE accounts under certain federal programs, specifically that amounts under \$100,000 are to be disregarded for means-tested federal programs. Amounts over \$100,000 are considered a resource of the designated beneficiary. Questions 41 and 89 on the FAFSA ask applicants to report the net worth of their investments. The notes provide applicants with details on what to include and not to include in reporting their investments. For example, the notes explain how 529 college savings plans are to be reported as assets, as well as how distributions from those accounts are to be reported. However, no information is provided concerning 529A accounts. Presumably amounts in such accounts and distributions from such accounts should not be reported. But applicants are likely to be confused about how to treat these investments and distributions without additional information, especially given how 529 college savings plans are reported. Adding additional information to the notes pertaining to 529A ABLE accounts would go a long way toward helping a vulnerable student population access funds they are entitled to and intended to help them achieve their postsecondary aspirations. Thank you for your consideration of these comments.	143.The following changes have been made as requested: Questions 41 and 90 notes (on the paper FAFSA form) and help text (on fafsa.gov and myFAFSA) have been updated to read " Investments do not include the home you live in, the value of life insurance, ABLE accounts, retirement plans (401[k] plans, pension funds, annuities, non-education IRAs, Keogh plans, etc.) or cash, savings, and checking accounts already reported in question 40 and 88."
50.	144.	Schedule 1 With the implementation of new federal tax forms for the 2018 tax year, the Department of Education (ED) was required to determine a proxy for "eligible to file a 1040A or EZ," as stated in the Higher Education Act (HEA), to determine eligibility for the Simplified Needs Test (SNT) or Automatic Zero Expected Family Contribution (auto zero EFC). In the draft 2020-21 FAFSA, ED has included a question "Did (or will) you file a Schedule 1 with your 2018 tax	144. Refer to response for comment number 1.2.

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>return?" (Question 35 for independent students and Question 82 for parents of dependent students). Answering "Yes" to this question eliminates the applicant from eligibility for SNT or Automatic Zero EFC, unless the applicant qualifies through the means-tested benefit or dislocated worker criteria.</p> <p>We appreciate ED's approach of keeping the FAFSA as simple as possible and minimizing the addition of new questions. We share the same goal. However, there are several situations where applicants would have qualified to file a 1040A or EZ prior to 2018 and therefore could have qualified for SNT or auto zero EFC, but are now required to file a Schedule 1 and therefore are automatically disqualified from eligibility for SNT and auto zero EFC. We believe these applicants should be held harmless from changes to the federal tax forms and should not be disqualified from eligibility for SNT and auto zero EFC.</p> <p>These applicants include independent students and parents who filed a Schedule 1 to claim or report one or more of the following: • Capital gain distributions • Unemployment compensation • Educator expenses • IRA deduction • Student loan interest deduction • Alaska Permanent Fund dividends</p> <p>Although we have no way of knowing the volume of FAFSA applicants who claimed or reported one of these items on their tax forms, in 2016, there were 8,416,612 1040A and 1040EZ forms that included one of these items, disaggregated as follows: • Capital gain distributions - 821,148 • Unemployment compensation and Alaska Permanent Fund dividends- 2,250,907 • Educator expenses - 765,173 • IRA deduction - 416,693 • Student loan interest deduction - 4,812,162</p> <p>To hold these FAFSA applicants harmless, we suggest adding a follow-up question to the FAFSA for those applicants who indicate that they did file a Schedule 1:</p> <p>"Did you file a Schedule 1 only to report or claim one or more of the following: • Capital gain distributions • Unemployment compensation • Educator expenses • IRA deduction • Student loan interest deduction • Alaska Permanent Fund dividends?"</p> <p>Applicants who respond "Yes" would then be considered for SNT or auto zero EFC. This approach is similar to the current FAFSA treatment of those tax filers who file a 1040 form only to claim the American Opportunity Tax Credit or Lifetime Learning Tax Credit.</p> <p>While this would be an additional FAFSA question, built-in skip logic means that our proposed new question would only be presented to a subset of FAFSA applicants - those whose eligibility for SNT or auto zero EFC has not already been determined by responses to earlier FAFSA questions, and who indicated that they did file a Schedule 1.</p>	

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>Our proposed new question imposes minimal additional burden on aid applicants and allows affected FAFSA filers to be held harmless from unrelated tax changes while keeping with the spirit of the Higher Education Act until reauthorization provides an opportunity to conduct a thorough review of Federal Methodology.</p>	
51.	145. 146. 147 148. 149. 150.	<p>1) That an additional skip logic question be added after the Simplified Needs Test filter question asking if a family filed a Schedule 1 tax form. For those families who answer “yes,” they should additionally be asked if they needed to file a Schedule 1 only due to options that can be selected from a list. The list should include items from the Schedule 1 that were previously on the 1040A such as the Alaska Permanent Fund or unemployment income. This will avert the tax form changes from preventing students’ eligibility for auto-zero EFC or Simplified Needs Test.</p> <p>2) That the language used to reference tax filing status should match what tax forms use exactly. The FAFSA uses "Married - Filed Joint Return" and "Married - Filed Separate Return," rather than the tax form which uses "Married Filing Jointly" and "Married Filing Separately."</p> <p>Additionally, NCAN commends Federal Student Aid's effort to conform the IRS Data Retrieval Tool so that the FAFSA questions continue to align with the tax forms. These updates are paramount to the success of the DRT, both easing the FAFSA filing and verification processes.</p> <p>After the primary goal of matching the DRT to the new tax forms is complete, NCAN also urges FSA to work with the Internal Revenue Service to make the DRT mobile-optimized, which will further the potential of the Mobile FAFSA and MyStudentAid App.</p> <p>FAFSA Usability Recommendations</p> <p>The user experience while filing the FAFSA also can create inadvertent barriers. To improve this experience and to increase the likelihood that students complete the FAFSA filing process, NCAN recommends:</p> <p>1) The creation of some level of flexibility in the address field on the tax return when attempting to bring information over from the DRT. If the correct FSA ID's have been entered, some allowances should be made for matching addresses regardless of spacing or abbreviation variations. For example, if the address on the tax form ends in “Street_,” a space must be added to the end of the DRT address match field (even though it is likely not visible on the tax return).</p> <p>2) All FAFSA filers should be required to hit confirm on selecting the name of their high school. The high school name drop box should be the first alternative and filers should only be able to type in a name when the filer cannot find the high school name in the drop box. This will greatly improve the FAFSA completion data in the federal tool as well as increase the accuracy of the information that state agencies provide to their school</p>	<p>145. Refer to response for comment number 1.2.</p> <p>146. 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> form.</p> <p>147. Thank you for your comment.</p> <p>148. Thank you for your comment. The Department of Education continues to work collaboratively with the Internal Revenue Service (IRS) to develop and implement enhancements to the IRS Data Retrieval Tool (DRT).</p> <p>149. This comment has been referred to the appropriate agency.</p> <p>150. Refer to the response for comment number 32.88.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	151.	<p>districts.</p> <p>a. Additionally, a filter question should ask students what is their high school graduation year. This would make for more accurate data in the FAFSA High School Completion Tool and allow for students who did not recently graduate to skip the high school selection question.</p> <p>3) A method to electronically submit a FAFSA signature page versus mailing it. This would expedite the process for any student or parent that have FSA ID issues (of which there are still many) or for undocumented parents. One solution would be to add a fax number or an email address to which the signature page can be sent. A confirmation should be provided that the signature page has been received.</p>	<p>151. Refer to response for comment number 28.77.</p>
	152.	<p>Recommend Changes to Improve the FSA ID Usability</p>	<p>152. 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> form.</p>
	153.	<p>Again, NCAN commends Federal Student Aid’s recent enhancements to the FSA ID creation/maintenance. This is a critical first step to filing the FAFSA. However, the recent change that requires the student and parent to have an email address or mobile phone number verified prior to the completion of setting up the FSA ID is presenting a hardship to various segments of students. The challenges in this area result from unintended consequences of school district policy. In particular, school districts have policies that prevent students from having cell phones during the school day and/or prevent the use of public internet site access in schools. Some examples include:</p> <p>1) Rural high schools with little to no cell phone service and an internet security policy that blocks outside websites.</p> <p>2) School buildings/districts that have policies that disallow students to have cell phones in schools and internet security policies that block outside websites.</p> <p>3) School buildings/districts that have policies why deny access to public internet sites (such as AOL, Gmail, Facebook, etc.).</p> <p>Students and parents frequently attempt to establish an FSA ID in these buildings because that is where guidance from a school counselor or college advisor is available. They will be denied access to the verification codes needed to finish the process if the school buildings follow these policies.</p> <p>Ideally, students would have access to either their cell phone or a personal email, but it is possible that they may not. NCAN recommends that alternative options be explored to cover students who have neither a cell phone nor access to personal email, or at the very least guidance to high schools to provide exceptions for FAFSA filing.</p>	<p>153. This comment has been referred to the appropriate business unit.</p> <p>154. This comment has been referred to the appropriate business unit.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	154.	For additional information on these proposals, please contact: Kim Cook Executive Director National College Access Network 1001 Connecticut Avenue NW Suite 300 Washington, DC 20036 cook@collegeaccess.org 202-347-4848x205	
52.	155.	We appreciate the opportunity to provide the following comments regarding questions 36 and 39. On those two points, we recommend adding in quotations: Include spouses income if you are married but filed a separate return.	155. No Change. The Department of Education believes the instructions and help text provide adequate guidance.
53.	156. 157. 158. 159. 160.	<p>0. The DRT is very confusing for students. Many don't know to click on it. The DRT should be automatically part of the FAFSA and studnets should be able to opt out of it rather than have to opt in.</p> <p>1. Verification-- verification process targets low-income students, doesn't typically verify anything, and is the cause of many students not receiving financial aid awards, not knowing their financial options, and even not attending college</p> <p>2 . The FAFSA needs a better explanation of how the FSA ID & FAFSA work together. Students usually refer to it as the FAFSA ID and don't understand the importance of recording and keeping their FSA ID information.</p> <p>3.The FAFSA can also tie in to state financial aid & residence systems in order to lessen the number of steps required. For example, North Carolina created a central Residency Determination Service that is simply another hurdle for underserved students to overcome.</p> <p>4.Students, parents, even counselors have no idea what the EFC is or why it is important. The dept of ed needs to better explain the central role of the EFC in the financial aid process, and improve the design & visibility of pre-FAFSA forecasting tools. In addition to graduation rates, FAFSA should also highlight % of need that colleges meet.</p>	<p>156. Thank you for your comment. Currently on fafsa.gov, both the "Link to IRS" and "Next" buttons automatically feed students and parents into the IRS DRT process. Users must actively opt-out of the process by selecting the "No Thanks" link.</p> <p>157. This comment has been referred to the appropriate business unit.</p> <p>158. No change. Fafsa.gov and the myStudentAid mobile app have adequate help topics explaining what the FSA ID is and how to use it.</p> <p>159. Thank you for your comment.</p> <p>160. No Change. The Department of Education believes that adequate information on the Expected Family Contribution is available in the help text. (https://studentaid.ed.gov/sa/help/efc).</p>
54.	161.	Getting students and parents to use the IRS DRT process increases the accuracy of the process and reduces the	161. No Change. The electronic FAFSA and the IRS DRT currently have adequate help text

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
	<p>162.</p> <p>163.</p>	<p>need for verification and the resulting verification melt. While several proposals, such as the FAFSA Act, in Congress could greatly expedite this process, perhaps the FAFSA instructions could suggest providing address and other information exactly as it appears on the tax return to ensure a match.</p> <p>Also, the new Schedule 1 in this past years tax return has adversely impacted the ability of families to qualify for the Simplified Needs Test (SNT). I know that states from Maine to Alaska have encountered problems with students and parents being excluded from SNT due to having items required to be reported on Schedule 1 that do not suggest a middle-to-high income family. I would encourage the Department to use skip logic or other approaches to identify Schedule 1 items that should not rule out SNT.</p> <p>On Question 27, the high school name, many students are skipping over or ignoring the drop-down box to type in their HS name. Often, the imprecise choice of a name results in a mismatch for a school that is available in the drop-down box. In some cases, a mismatch resulting in an other code can result in delays or ineligibility for state grant processing. I encourage the Department to evaluate, if not requiring the use of the drop-down box, at least make typing in the name a last resort, not the easiest/quickest approach. For a graduating HS senior, it may even be an option to populate drop-down box with a list of most likely high schools based on the students zip code or other factors. Ultimately, there are strengths and weaknesses to different approaches, and older students may find that their high school no longer exists (as is true for me). Perhaps having some focus groups of students might result in a student-driven solution for getting a better HS match rate? Thank you for considering these suggestions!</p>	<p>to address this.</p> <p>162. Refer to response for comment number 1.2.</p> <p>163. Refer to the response for comment number 32.88.</p>
55.	164.	<p>Vermont has noticed a sharp increase from FY 19 in the number of Vermont first-year students who filed their FY 20 FAFSAs without being assigned a High School Code Number during the process. We have done a little research on what is different on the application and there is a change in the way the navigation buttons are presented to students. What we are finding is that a large number of students are typing in their high school using creative and varied spellings that arent being recognized. Consequently instead of coming through with the appropriate high school code (which we use in our FAFSA Completion Tool for matching purposes (along with every spelling and abbreviation for each school that we can think of) they are coming through with either a 0000 or a 9999. This is creating havoc with the tool that we use to inform schools if their high school students have filled out the FAFSAs. Is the inability to assign these students to a specific high school is impacting the percent of high school students who are reported in national reports as filling out the FAFSA. Earlier NCAN published a report that the filing rate for high school seniors was only 47.2 percent. The question asks you to type in the name of your high school, the city of your high school, and the state of your high school. You then have 3 button options PREVIOUS, NEXT, or SEARCH. If you select SEARCH, the next screen brings up a list of potential schools for you to select. If you select NEXT, it takes you to the next FAFSA question and does not give</p>	<p>164. Refer to the response for comment number 32.88.</p>

2020-21 Federal Student Aid Application 60 Day Public Comments Tracking Summary

#	ID	Comments	Formal Response
		<p>you the option to select a high school. For FY19, the SEARCH button was highlighted and placed to the far right of the screen. For FY20, the SEARCH button was listed first (still highlighted) and the NEXT button is to the far right of the screen: We believe what happens is if they hit SEARCH and then select the high school from the list provided, the High School code is populated on the FAFSA. If they hit NEXT and do not get the screen to select a high school, I believe the High School code is not getting populated on the FAFSA in some larger number of cases than we saw last year. VSAC recommends changing the navigation so that students are encouraged to select their high school from the drop down list rather than typing in the name. Marilyn Cargill Vice President, Financial Aid Services, Marketing and Research 802-542-2201 cargill@vsac.org</p>	
56.	165.	<p>It would be best to use similar method in the past re: those who only filed a certain tax form still being able to qualify for the SNT or Auto zero EFC. The Schedule 1 criteria as is will hurt many who qualified for SNT or Auto Zero EFC in the past. Given two questions in prior years are being eliminated (re: filed 1040 but could have filed 1040A or 1040EZ) Perhaps new question can be developed as follows: Did you only file Schedule 1 to list these items (name the key lines e.g. unemployment benefits, etc.) and have not dollar amounts listed on these lines fo Schedule 1. (That latter would be those that always used to require the 1040 to be filed)</p>	165. Refer to response for comment number 1.2.