

2023-2024 Federal Student Aid Application Comments Tracking Summary

#	ID	Comments	Formal Response
1	1.a	Re: FAFSA Questions 41b and 89b. The business IRA deduction appears on Schedule 1, line 16 in tax year 2021. The personal IRA deduction appears on Schedule 1, line 20 in tax year 2021. Questions 41b and 89b reference the wrong lines for this part of the question, and the question should read "From IRS Form 1040, Schedule 1— total of lines 16 + 20".	1.a: At the time the 60-day public comment period opened, the department was in consultation with the Internal Revenue Service to define the appropriate tax line references updates for the 2023-24 FAFSA form. Updates to the tax line references numbers will be provided in the 30-day public comment period. Thank you for your comment.
	1.b	Re: FAFSA Questions 41h and 89h. The Health Savings Account Deduction appears on Schedule 1, line 13 in tax year 2021. Questions 41h and 89h reference the wrong line for this part of the question.	1.b: Refer to response for comment number 1.a .
	1.c	Re: The instructions for Questions 32 and 79, that appear on page 9 of the FAFSA Draft: Several of the tax lines cited in the draft are incorrect.	1.c: Refer to response for comment number 1.a .
	1.d	In 2021, the following items appear on the following lines of Schedule 1: Educator Expenses Deduction: line 11 (not 10).	1.d: Refer to response for comment number 1.a .
	1.e	IRA Deduction: line 20 (not line 19)	1.e: Refer to response for comment number 1.a
	1.f	Student Loan Interest Deduction: line 21 (not line 20).	1.f: Refer to response for comment number 1.a
	1.g	Also, the Alaska Fund Dividend appears specifically on Schedule 1, line 9f.	1.g: Refer to response for comment number 1.a
	1.h	It is no longer necessary to mention that line 8 (which is now line 9) cannot be negative as this tax item can be cited specifically as Schedule 1, line 9f.	1.h: This change will be made as requested.
2		Page 9: Re: Schedule 1 Instructions: 2. Alaska Permanent Fund dividend (line 8 - may not be a negative value). This should be line 8f 3. Educator Expense (line 10). Should be line 11 4. IRA deduction (line 19). Should be line 20 5. Student loan interest deduction (line 20). Should be line 21	2: Refer to response for comment number 1.a
3	3.a	The IRS has changed many of its forms that had numbers and letters in them to include a hyphen between the number and letter. This includes Form 1040-NR, which is cited in the instructions for questions 35, 36, 83, and 84, in questions 30 and 77, and in the notes on page 9 for questions 30 and 77 as Form 1040NR (which is not longer what the form is called).	3.a: This change will be made as requested.

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	3.b	Also, most times when "1040" is mentioned, it states "Form 1040". This is not the case in questions 30 and 77 (where the same issue exists for Form 1040NR). I think it would be clearer if the word "Form" was added before these instances of "1040" or "1040NR".	3.b: This change will be made as requested.
4	4.a	Regarding the instructions for questions 41h and 89h (the "other untaxed income" questions). First, the instructions for the question list "untaxed foreign income" as something that must be reported. This is misleading and leads to incorrect answers, because only foreign UNEARNED untaxed income is supposed to be reported here (this has been made explicit in the Application and Verification Guide). Foreign EARNED income is supposed to be reported in the income earned from work questions. By adding "unearned" to this question here, fewer FAFSAs will be incorrect.	4.a: This change will be made as requested.

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	4.b	Also, the 2021 Schedule 1 now lists "Archer MSA deduction" on line 23. This deduction is very similar to the Health Savings Account deduction on line thirteen that is cited as another kind of income to be reported in Questions 41h and 89h. Since it is now available to aid officers who review tax returns and is available on Schedule 1, shouldn't it be listed as one of the kinds of income that needs to be reported in this question? Thank you for your consideration.	4.b: The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
5	5.a	Questions 35 and 36 are asking for similar information as questions 83 and 84, but the sentence "If any individual earnings item is negative, do not include that item in your calculation" only appears in the instructions for questions 35 and 36. It has been removed from the instructions for questions 83 and 84. Since the questions are asking for similar information (the first two from the student and spouse and the second from the dependent student's parents), the text should be included (or eliminated) from both questions.	5.a: This change will be made as requested.
	5.b	Also, the text, if you include it, is not quite correct. The intention of the text is that if the total from Schedule 1, line 3 is negative, to not include that total. If the total from Schedule 1 line 6 is negative, do not include that total.	5.b: This change to the instructional text will be updated.
	5.c	Similarly for Schedule K-1 (Form 1065) box 14 code A. If you replace the this sentence with "If Schedule 1 lines 3 or 6 or the sum of the Schedules K-1 (Form 1065) Box 14 Code A are negative, do not include that item in your calculation", the instruction will better match the intent of the question.	5.c: No Change. The Department of Education believes the instructions and help text provide adequate guidance.
	5.d	Finally, kudos in the new instruction. It is much clearer than last year's text.	5.d: Thank you for your comment.
6		Could you add the option of faxing in the FAFSA Signature Page along with mailing it?	6. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).
7		I would like to see a return to right justification of all reported data on the ISIR - the past 2 years have some data right justified and some not.	7.: The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.

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8		Question 49 is confusing for students who were placed in foster care for only a couple days. When asked, the FSAIC said that students need to have been in foster care for "at least weeks" not "2 or 3 days" to answer yes to this question. If there is a specific time a student needs to have been in foster care before they should answer yes, that should be made clear in this question.	8: No change. The Department of Education believes the instructions and help text provide adequate guidance.
9		On the 2023-2024 FAFSA it would be most helpful if on question 98b,98d,98f,98h they student is not allowed to go past this until the question about the housing plan is complete. Or if possible go ahead and process the information and send a rejected ISIR to the schools. That way we would know the FAFSA was completed but has errors. We would be more proactive then reactive. This would help the students FAFSA to be processed quicker.	9: No Change. Applications submitted via PDF with the housing plans questions left unanswered are processed and an ISIR is sent to the schools listed. Applications submitted electronically are not allowed to proceed past this question without providing a response to the housing plan question.
10		I would like to see question regarding the housing plan 98b, 98d, 98f,98h updated to not allow the student to pass this question without selecting the housing plan. The student doesn't answer the question and the FAFSA doesn't process and the school isn't notified. Can you either make it a required field that they can't leave the screen without answering or maybe send a rejected ISIR to the school listed so we can assist the student to answer that question. This would make the school proactive instead of reactive.	10: No Change. Applications submitted via PDF with the housing plans questions left unanswered are processed and an ISIR is sent to the schools listed. Applications submitted electronically are not allowed to proceed past this question without providing a response to the housing plan question.
11	11.a	<p><u>Professional Judgment</u>: 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> <p>This is especially important in the aftermath of the COVID-19 pandemic, when</p>	11.a: 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.

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		family members may have lost their jobs, including in the middle of the base year and after the base year for FAFSA income and tax information.	
	11.b	Also, in the paragraph about professional judgment, insert “and pay cuts” after “loss of employment”, as this is the second most common special circumstance for which an adjustment is often made. The U.S. Department of Education should be able to confirm this by comparing the data elements in the initial transaction with the data elements after PJ, thereby identifying the data elements that changed. Some families experience pay cuts for reasons other than job loss, such as furloughs and elimination of bonuses. We have note that this has happened more frequently during the pandemic.	11.b: This change will be made as requested.
	11.c	A common question from students and parents is how long it will take to process the FAFSA. Our usual response is that it can take 3 days to 3 weeks for the SAR or SAR Acknowledgement to arrive, depending on whether the FAFSA is filed online or on paper, whether it is signed with an FSA ID and whether an email address was provided on the FAFSA. Currently, the FAFSA instructions provides some information like this, but it doesn’t show the impact of signing the FAFSA with an FSA ID on processing times, just the impact of providing an email address. It would be helpful to add a “Processing Time” table to the FAFSA with more detailed information in the Mail Your FAFSA Form section.	11.c: No change. The Department of Education believes the instructions and help text provide adequate guidance.
	11.d	The reference to “unusual circumstances” under “Fill Out the FAFSA Form” on page 1 and “How much student financial aid will I receive?” on page 2 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.	11.d: 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.
	11.e	Under “Use Your Tax Return”, it would be helpful to provide information about how long it takes after the federal income tax return is filed for the IRS Data Retrieval Tool to become available (e.g., 2-3 weeks if the federal income tax return was filed electronically, 11 weeks if the federal income tax return was filed on paper).	11.e: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.f	Under “Use Your Tax Return”, add “(IRS DRT)” after “IRS Data Retrieval Tool”.	11.f: No change. The Department of Education considers this suggestion a stylistic preference.

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	11.g	We recommend elevating the paragraph about help filling out the FAFSA into its own section entitled, "Free Help Filling out the FAFSA". There has been an increase in paid FAFSA completion services. By elevating this section, it will draw added attention to the fact that the FAFSA is a free form and nobody needs to pay anybody to complete the FAFSA on their behalf. This was part of the intent of the STOP Act (P.L. 116-251).	11.g: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.h	Insert "without cents" before "like this" in the bullet point about how to report dollar amounts. The added emphasis may help reduce errors. There is enough room for this change.	11.h: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.i	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 font size as the predominant text on a page. Many states have plain language statutes that require fine print to be even larger.	11.i: No change. This suggestion is present in the 2023-24 FAFSA form.
	11.j	Insert "Federal Income" before "Tax Return" in the heading, replacing "Use Your Tax Return" with "Use Your Federal Income Tax Return", 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. The terminology needs to be made consistent throughout the FAFSA.	11.j: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.k	Contrary to the trademark line on the bottom of the page, the Federal Student Aid logo is not a registered trademark. We checked the USPTO trademark database. FAFSA is a registered trademark, as is "Proud Sponsor of the American Mind". Either omit the reference to the Federal Student Aid logo or drop the word "registered" to ensure that the sentence is accurate.	11.k: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	11.l	In the "Let's Get Started!" section at the bottom of the first column, it tells the applicant to go to page 3, skipping over page 2. The "What is the FAFSA form?" section on page 2 is not even mentioned. Perhaps a mention of page 2 should be added.	11.l: No change. The Department of Education considers this suggestion a stylistic preference.
	11.m	In the footnotes on the right side, replace "^ As soon as possible after October 1, 2022." with "^ As soon as possible on or after October 1, 2022." to be consistent with the usage throughout the FAFSA.	11.m: This change will be made as requested.
	11.n	The last two sentences under "How much student financial aid will I receive?" overlap with the discussion of professional judgment on page 1. If this	11.n: No Change. This issue either falls outside the scope of the FAFSA form or is too nuanced to be properly addressed in this context.

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		information were merged into the similar information on page 1, it would allow enough room for a brief discussion of verification, which is noticeably lacking on the FAFSA.	
	11.o	Under “How much student financial aid will I receive?” insert “annual” before “cost of attendance”.	11.o: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.p	Under “When will I receive the student financial aid?” perhaps mention that excess funds (credit balances) must be refunded to the student within two weeks.	11.p: No Change. This issue either falls outside the scope of the FAFSA form or is too nuanced to be properly addressed in this context.
	11.q	Under “How can I have more colleges receive my FAFSA form information?” it should mention that applicants have to wait until they receive the SAR or SAR Acknowledgement before replacing the colleges on the FAFSA, or the college will not receive the FAFSA information.	11.q: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.r	Under “Where can I receive more information on student financial aid?” perhaps mention state College Goal Sunday and Cash for College Programs. See NCAN’s website, formyourfuture.org , for more information.	11.r: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.s	Under “Why all the questions?” replace “school or state aid” with “college or state aid” to avoid ambiguity concerning K-12 vs. postsecondary institutions. Throughout the FAFSA, the use of the terms “school” and “college” should be made consistent to avoid this potential source of confusion. There are numerous examples where the word “school” is used to refer to a college that can potentially be a source of confusion for applicants.	11.s: No change. The Department of Education considers this suggestion a stylistic preference.
	11.t	In the “Effects of Not Providing Information” section, it includes this sentence: “If you are applying solely for federal aid, you must answer all of the following questions that apply to you and are requested: 1-9, 14-16, 18, 23, 25, 26, 29-55, 57-64, 69-97, 99, and 100.” There are a few opportunities for hyphens, such as replacing “25, 26” with “25-26” and “99, and 100” with “and 99-100”.	11.t: No change. The Department of Education considers this suggestion a stylistic preference.
	11.u	In the FAFSA Privacy Act Statement, under Routine Uses, add a mention of the IRS in the second bullet.	11.u: No change. Any additional information may be found at the website listed in the second bullet point.
	11.v	In the text before question 1, perhaps omit the period after “Jr” since periods should not be provided in the name fields. Perhaps also add instructions on how to handle hyphenated names, which are becoming more common.	11.v: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.w	In questions 1 and 2, there is a different amount of space before the word “name”. This may be due to the difference between holding the shift key when hitting the Enter key and not. The former is a newline while the latter is a new paragraph. There is a different amount of interline leading for a newline vs. a	11.w: No change. The Department of Education considers this suggestion a stylistic preference.

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		new paragraph.	
	11.x	In question 14, U.S. permanent residents (green card holders) often get confused as to how to answer this question. Although this is addressed in the Notes, perhaps there's a way to signal this in the eligible noncitizen choice, maybe by inserting "(green card)" after "noncitizen"?	11.x: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.y	In question 16, the answer choices are currently arranged top-bottom, left-right. Perhaps run a focus group to compare this with left-right, top-bottom, so that the order would be I am single I am married/remarried I am separated I have divorced or widowed This is similar to the order of the answers to question 55.	11.y: No change. The Department of Education considers this suggestion a stylistic preference.
	11.z	In questions 17 and 56, insert "most recently" before "married, remarried, separated, divorced or widowed".	11.z: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.aa	In questions 21 and 22, the terms "Parent 1" and "Parent 2" are not defined like they are for questions 83 and 84. Perhaps the questions should be made more consistent with each other.	11.aa: No Change. The responses to these questions have been carefully selected in consultation with the states since use of the responses varies by state.
	11.ab	In questions 21 and 22, add a note that they should choose "College or beyond" if they have at least a Bachelor's degree and "High school" if they have some college but not a degree, a certificate or an Associate's degree. Otherwise, if the parent attended college but did not obtain a Bachelor's degree, they might incorrectly answer "College or beyond", which will prevent them from getting financial aid for first-generation college students in some states.	11.ab: No Change. The responses to these questions have been carefully selected in consultation with the states since use of the responses varies by state.
	11.ac	Questions 21 and 22 can be merged to yield "Highest school completed by Parent 1 and Parent 2." That will be sufficient to determine whether the student is a first-generation college student.	11.ac: No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).
	11.ad	While the removal of the question about Selective Service registration is consistent with the FAFSA Simplification as specified in the Consolidated Appropriations Act, 2021, the removal of the "Are you male or female?" question is not. Section 483(a)(1)(B)(ii)(VII) of the Higher Education Act of 1965, as amended by the Consolidated Appropriations Act, 2021, requires the	11.ad: No change. As announced in a June 11, 2021, Electronic Announcement , the Department of Education will conduct a phased implementation of the FAFSA Simplification Act. Please refer to that announcement.

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		FAFSA to continue collecting information about the sex of the applicant. Omitting this question may cause problems for the 2023-24 National Postsecondary Student Aid Study (NPSAS:24), which relies on FAFSA data concerning gender.	
	11.ae	In question 27, students sometimes get confused between their immediate degree objective and their ultimate degree objective. Please consider ways of tweaking the working of the question to reduce or eliminate this source of confusion.	11.ae: No change. The Department of Education considers this suggestion a stylistic preference.
	11.af	In question 38 (and question 86 on page 7), one of the most common errors is reporting money in a qualified retirement plan account (e.g., 401(k), 403(b), IRA, SEP, SIMPLE or Keogh account) as an investment. There's enough room in the question to add " Don't include qualified retirement plan accounts (401(k), 403(b), IRA, Roth IRA, etc.)"	11.af: No change. The Department of Education believes the current instructions provide adequate guidance.
	11.ag	In question 41(h) (and question 89(h) on page 7), some applicants may be confused about how to report the various IRS advanced payments, such as the Advance Child Tax Credit and stimulus payments, which are advance payments of tax credits and, therefore, tax-free. Such advance payments should not be reported as income on the FAFSA. Another potential problem relates to the tax-free unemployment benefits, which some taxpayers may have paid taxes on or not, depending on when they filed their federal income tax returns.	11.ag: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	11.ah	Schedule 1 is required if the taxpayer paid a penalty on the early withdrawal of savings. We recommend adding an exception for this, as it often affects low-income applicants and does not provide a good mechanism for wealthy families to manipulate their income.	11.ah: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	11.ai	In question 40, items c and f could potentially be combined if necessary to make room for additional colleges to be listed on the FAFSA.	11ai: No Change. Earnings from a cooperative education program and need based employment are different, and the Department of Education believes they should be asked separately to avoid confusion.
	11.aj	In questions 40(b) and 41(c), and likewise for questions 88(b) and 89(c) on page 7, italicize or bold the words "paid" and "received" to emphasize the difference. Applicants sometimes get these confused.	11aj: This change will be made as requested.
	11.ak	In question 41(e), there have been numerous reports of the exclusion of rollovers not being implemented correctly in connection with the IRS Data Retrieval Tool. Some applicants who use the IRS Data Retrieval Tool have not been asked whether any portion of the IRA distribution is from a rollover.	11.ak: Thank you for your comment. The process for answering FAFSA question #41(e) was designed as a result of usability testing. The IRS Data Retrieval Tool is functioning as designed.

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		When they raise the issue with the colleges, some college financial aid administrators refuse to make an adjustment to correct the problem even when provided with documentation. This problem is causing some families to not use the IRS Data Retrieval Tool when they had a rollover in the prior-prior year.	Regarding FAAs refusing to make adjustments – this comment has been referred to the appropriate business unit.
	11.al	In question 42, replace “Were you born before January 1, 2000?” with “Were you born in 1999 or an earlier year?” Applicants often get confused about date comparisons, so focusing on just the year will reduce the likelihood of an error.	11.al: No change. The Department of Education considers this suggestion a stylistic preference.
	11.am	In question 44, perhaps add “MS” and “MSW” after “MA”, “LLB” after “JD”, and “DO” and “DVM” after “MD”? There’s room to add a few more examples of graduate degrees.	11.am: No change. The Department of Education considers this suggestion a stylistic preference.
	11.an	Questions 52 to 54 could be reorganized to be less verbose, if the space were needed to increase the number of colleges listed on the FAFSA. The new wording would be as follows: <i>At any time on or after July 1, 2022, were you determined to be an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless by any of the following (See Notes page 10)</i> 52. Your high school or school district homeless liaison 53. The director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development 54. The director of a runaway or homeless youth basic center or transitional living program	11.an: No change. The Department of Education considers this suggestion a stylistic preference.
	11.ao	In the paragraph before question 55, insert “cousins” after “uncles”.	11ao: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.ap	In question 56, the three lines after “Month and year” are not aligned with the “M” in “Month” but rather appear to be slightly indented. This may be due to the difference between a newline, a new paragraph and wrapping at the end of a line.	11.ap: No Change. The Department of Education considers this suggestion a stylistic preference.
	11.aq	In the text that precedes question 57, or in the notes, consider adding some discussion of Social Security Numbers that were issued to DACA recipients. To qualify for DACA, the individual must have been under age 31 as of June 15, 2012. Since it is now 2022, it is possible for a DACA recipient to have reached age 40 as of the date the FAFSA is filed. This means there may be some college-	11aq: No Change. The parent should enter their SSN information as instructed on the FAFSA form.

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		<p>age children who are U.S. citizens and whose parents have DACA-issued Social Security Numbers. The instructions need to clarify that the parents should not supply DACA-issued Social Security Numbers but instead use 000-00-0000. Either that, or flag the Social Security Numbers as DACA-issued. This matters with regard to eligibility for the Federal Parent PLUS loan.</p>	
11.ar		<p>In the text that precedes question 57, replace “for May 31, enter 05 31” with “for May 1, enter 05 01” so that it illustrates the inclusion of a leading zero for the day.</p>	<p>11ar: No Change. The Department of Education believes the current instructions provide adequate guidance.</p>
11.as		<p>In question 65, in both the heading and the text, replace “parents” with “parent’s” as there is just one email address. Referring to it in the plural may confuse some applicants into providing two email addresses in the form instead of just one.</p>	<p>11as: No Change to the FAFSA PDF. 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 Free Application for Federal Student Aid (FAFSA®).</p> <p>This change will be made to the electronic versions of the FAFSA form.</p>
11.at		<p>Regarding the paragraph that precedes questions 71 to 74 (and questions 92 to 95 on page 8), some applicants misinterpret this question to mean that they do not qualify for financial aid if they do not receive any of these means-tested federal benefit programs. They do not understand that these questions present an alternative method of qualifying for federal aid. It might be a good idea to tweak the question wording to make this clear.</p>	<p>11at: No Change. The Department of Education considers this suggestion a stylistic preference.</p>
11.au		<p>Regarding question 73, some school districts provided free school lunches to all students during the pandemic, without regard to financial need. Others provided the families with a variation on SNAP. It might be worthwhile to address this in the Notes.</p>	<p>11au: No Change. The Department of Education believes the current instructions provide adequate guidance.</p>
11.av		<p>Questions 76-79 assume that there is a single tax return. But, married parents can file two returns in some situations, such as married filing separately. Also, if the parents are unmarried and live together, there might be two tax returns. So, rather than write “return” in the singular, write “return(s)”.</p>	<p>11av: No Change. The Department of Education considers this suggestion a stylistic preference.</p>
11.aw		<p>It is not uncommon for people who are not married (e.g., single, never married, or divorced) to incorrectly file a federal income tax return as married filing jointly because it yields a lower tax liability. An edit check should be added to detect this situation.</p>	<p>11aw: No change. Edit checks already exist for this scenario, with an accompanying message for online applications and a SAR comment for paper applications, guiding the user to make the appropriate correction.</p>

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	11.ax	Question 80 asks whether either of the applicant's parents are a dislocated worker. However, if the student's parents are divorced, only one parent is responsible for completing the FAFSA and it would be incorrect for the student to answer this question about the non-custodial parent. Perhaps this should be addressed in the Notes on page 10.	11ax: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.ay	The paragraph before questions 83 and 84 does not include the sentence "If any individual earning item is negative, do not include that item in your calculation." that appears before questions 35 and 36.	11.ay: This text will be updated.
	11.az	For question 86, see the comments on question 38 on page 4.	11.az: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aaa	For question 88(b) and 89(c), see the comments on questions 40(b) and 41(c) on page 5.	11aaa: This change will be made as requested.
	11.aab	For question 89(h), see the comments on question 41(h) on page 4.	11.aab: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	11.aac	Regarding the paragraph that precedes questions 92 to 95, see the comments on questions 71 to 74 on page 6	11aac: No Change. The Department of Education considers this suggestion a stylistic preference.
	11.aad	Question 97 (dislocated worker) should be relocated adjacent to question 32 similar to the way in which question 80 is adjacent to question 79. This will free up more space to list additional colleges on the paper FAFSA	11aad: No Change. The Department of Education considers this suggestion a stylistic preference.
	11.aae	Question 98 provides space for only four colleges. According to the 2019 American Freshman survey by UCLA's Higher Education Research Institute (HERI), only 40.5% of college freshmen applied for admission to four or fewer colleges. Increasing the number of schools in this question will accommodate more applicants. Five schools would cover 51.5%, six schools would cover 61%, and seven schools would cover 68.3%.	11aae: 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 Free Application for Federal Student Aid (FAFSA®).
	11.aaf	It is odd that even though the number of questions has decreased from 106 to 103, there's still only enough room for four colleges to be listed on the form. Please consider using the freed-up space to add space for at least another college to the paper FAFSA.	11aaf: 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 Free Application for Federal Student Aid (FAFSA®).
	11.aag	With regard to the signing statement, although the penalties are up to \$20,000 and up to 5 years in prison per 20 USC 1097, the penalties and duration of incarceration can be greater under mail and wire fraud statutes. Also, there	11aag: No Change. The Department of Education believes the suggested change would affect the legal substance of the certification statement.

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		can be several penalties if there are multiple counts (e.g., FAFSAs for multiple children). Alternately, insert “for up to 5 years” after “sent to prison” to be consistent with the current “up to \$20,000” language.	
	11.aah	U.S. students whose parents live outside the U.S. often ask if there’s an option for their parents to fax the signature page instead of mailing it. International postal mails can be even slower than U.S. postal mails. During the pandemic, some countries temporarily stopped postal mail service to the U.S. or charged much higher postage and shipping fees.	11.aah: 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 Free Application for Federal Student Aid (FAFSA®).
	11.aai	The Notes for Question 8 should address Social Security Numbers issued to undocumented parents under DACA, as this is now a possibility.	11.aai: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aaj	The Notes for Questions 14 and 15 should address people who were evacuated from Afghanistan.	11.aaj: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aak	The Notes for Questions 14 and 15 should mention M1 and M2 visas in the second paragraph, after F1 and F2 visas since they are also student visas. Also, the visas should be hyphenated as M-1, M-2, J-1, J-2, F-1 and F-2 to follow the practice of the U.S. Department of State.	11.aak: This change will be made as requested.
	11.aal	In the Notes for questions 32 and 79, the line numbers for IRS Form 1040 Schedule 1 need to be updated, as they changed in 2021. The line number for educator expenses is line 11, for IRA deductions is line 20 and for student loan interest deduction is line 21. Other line numbers for Schedule 1 throughout the FAFSA may also need to be updated. Also, the items listed on Schedule 1 have changed and should be reviewed to identify other exceptions to the requirement to file Schedule 1. The 2021 Schedule 1 can be found at https://www.irs.gov/pub/irs-pdf/f1040s1.pdf .	11.aal: Refer to response for comment number 1.a .
	11.aam	The Notes for questions 38 and 39, 41i, 86 and 87 use the language “minus debts related to those same investments...” and “Investment debt means only those debts that are related to the investments” But, the language at 20 USC 1087vv(g) states, “minus the outstanding liabilities or indebtedness against the assets”. That’s a stricter legal requirement that the debts be secured by the assets. This matters when a family uses a home equity loan on the principal place of residence to buy a vacation home. The word “related” might be interpreted as reducing the net worth of the vacation home, while the statutory language does not allow such an interpretation. The use of the word “related” is inconsistent with the statutory language and the guidance	11.aam: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.

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		published by the U.S. Department of Education in the Application and Verification Guide.	
	11.aan	In the Notes for questions 38 and 39, 41i, 86 and 87, under “Investments do not include”, insert the word “qualified” before “retirement plans”. This will clarify that non-qualified retirement plans, such as 409A and 457 plans, must be reported as investments on the FAFSA. If it can fit, it would be helpful to add Roth IRAs and 403(b), SEP, and SIMPLE plans to the list of retirement plans. To make room for this, some wordsmithing of the “Investments include” paragraph can save a line by eliminating the widowed line. Just replace “do not include” with “not”, “that has” with “with”, “UGMA and UTMA” with “UGMA/UTMA” and, if necessary, “trust funds” with “trusts” and “certificates of deposit” with “CDs”.	11.aan: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aao	In the Notes for questions 38 and 39, 41i, 86 and 87, under “Investments do not include”, either omit annuities from the list, or clarify that annuities only are excluded to the extent that they are part of a qualified retirement plan. Perhaps also insert the word “qualified” before “annuities”. The definition of assets at 20 USC 1087vv(f) includes “tax shelters”. Annuities are a type of tax shelter and, therefore, should be reported as an asset, especially if non-qualified.	11.aao: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aap	In the Notes for questions 38 and 39, 41i, 86 and 87, under “Business value does not include”, the word “directly” is not defined. There are many different definitions in the tax code of what it means for someone to be related to you, such as in the definition of a qualified education loan or a 529 college savings plan. The Higher Education Act of 1965 also has various definitions, such as in 20 USC 1087vv(l) and (k). So, it is unclear if “directly related” includes grandparents and great grandparents, who are more than one generation removed. What about 5 th cousins twice removed? Great aunts and uncles? What about a mother-in-law? What about adopted children? Foster children?	11.aap: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aaq	Under Notes for question 46, please consider putting the word “dishonorable” in quotes and/or capitalize it. This is a common source of confusion because one of the discharge statuses that nevertheless qualifies as a veteran for federal student aid purposes is an “other than honorable discharge”. Tokenizing the word “dishonorable” will clarify that it is a specific discharge status and not descriptive.	11.aaq: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aar	In the Notes for question 46, please consider adding "A copy of your DD-214	11.aar: No Change. The Department of Education believes the current

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		may be required by the college financial aid administrator." at the end.	instructions provide adequate guidance.
	11.aas	In the Notes for question 49, perhaps clarify whether foster care includes kinship foster care.	11.aas: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aat	Foster children and advocates have reported that the Federal Student Aid Information Center (FSAIC) has told them that there is a durational requirement of at least a few weeks. This is inconsistent with previous practice, which required the student to have been in foster care for at least a day. It's also inconsistent with the Higher Education Act of 1965, which does not specify a durational requirement. Perhaps the Notes for question 49 should be modified to add "for at least a day" so the foster children have something to point to when they get incorrect information about the requirements for independent student status due to a foster care placement.	11.aat: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	11.aau	In the Notes for question 49, clarify that the applicant should answer "Yes" even if they were subsequently adopted after reaching age 13.	11.aau: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aav	It would be nice to add a mention of the Chafee Grant, perhaps with a link to a page on the U.S. Department of Education website about Chafee Grants that links to the various state websites. There is not currently any such webpage about the Chafee Grant on the U.S. Department of Education's website. This is a major omission.	11.aav.: The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
	11.aaw	In the Notes for questions 50 and 51, perhaps add a paragraph about sham legal guardianships, where the student continues to live with and/or receive financial support from their parents.	11.aaw: No Change. The Department of Education believes the current instructions provide adequate guidance.
	11.aax	The Notes for Step Four, questions 55-89, first bullet uses the term "legal parent" before it is defined in the second bullet. We suggest moving the implicit definition of legal parent from the second bullet and insert it as a new bullet ahead of the current first bullet, such as, "A legal parent is a biological, adoptive, or as determined by the state [for example, if the parent is listed on the birth certificate])."	11aax: No Change. The Department of Education considers this suggestion a stylistic preference.
	11.aay	In Notes for Step Four, questions 55-89, second bullet, delete "or biological" from "legal or biological parent" as "legal parents" is defined earlier in the same paragraph as including biological parents.	11aay.: No Change. The Department of Education considers this suggestion a stylistic preference.
	11.aaz	In Notes for Step Four, questions 55-89, fourth bullet, it does not address the situation when the student lives equally with both parents and both parents have always provided an equal amount of financial support. The Application	11.aaz: No Change. The Department of Education believes the current instructions provide adequate guidance.

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		and Verification Guide indicates that, in such a scenario, the parent responsible for completing the FAFSA is the parent with the greater income. This Note should indicate something to that effect, such as by adding “Otherwise, answer questions about the parent with the greater income.” after the close parenthesis.	
11.aaaa		Regarding the Notes for questions 80 and 97 (dislocated worker), the online FAFSA’s skip logic omits the question about dislocated worker status for the student and parent if parent income is greater than \$50,000 or if parent income is less than \$50,000 and Schedule 1 is not required. The dislocated worker status question should be asked regardless, as it provides the college financial aid administrator with an indication that the applicant might benefit from a professional judgment review.	11.aaaa: No Change. The Department of Education limits the collection of information to data necessary to determine eligibility and to simplify the application process. As documented in the 2023-24 Data Elements and Justification , the dislocated worker question is only asked to determine if an applicant qualifies for the simplified needs test or automatic zero EFC formula.
11.aaab		In the second checkbox bullet on the first page, replace “confirms the data” with “confirms the accuracy of the data” and insert “legal” before “authority”.	11.aaab: No Change. The Department of Education believes the current instructions provide adequate guidance.
11.aaac		Also, in the second checkbox, replace “school” with “college” as some students may get confused and think that their secondary school is responsible for verification.	11aaac: No Change. The Department of Education considers this suggestion a stylistic preference.
11.aaad		The wording in the paragraph that begins “The EFC is not the amount of money that your family must provide” seems to assume that a student’s full demonstrated financial need will be met by the college through a combination of federal, state and institutional aid. But, three quarters of students in Bachelor’s degree programs have unmet need, based on an analysis of data from the 2015-16 National Postsecondary Student Aid Study (NPSAS:16), and the average unmet need exceeds \$10,000. So, the majority of families will pay more than the EFC to cover college costs.	11.aaad: Thank you for your comment.
11.aaae		In the paragraph that begins “Your financial aid package”, replace “school’s financial aid office” with “college’s financial aid office”. Private secondary schools also have financial aid offices, so this language may be confusing to students who attended a private secondary school.	11aaae: No Change. The Department of Education considers this suggestion a stylistic preference.
11.aaaf		Insert a comma in dollar amounts greater than \$999, replacing “\$6495” with “\$6,495”.	11.aaaf: 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 Free Application for Federal Student Aid (FAFSA®).

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	11.aaag	Please consider adding a To Do list to the first page of the SAR. The last line of the first page, "You should keep this SAR for your records" can be part of the To Do list. Another item can be responding to the college financial aid office's requests for documentation in a timely manner if the applicant's FAFSA is selected for verification. Another can be to contact the college's financial aid office if the applicant's ability to pay is affected by special circumstances. There could also be a mention of financial aid award letters, which may need a response, and the Master Promissory Note (MPN) if the applicant will be borrowing federal student loans. Finally, there can be an item about correcting any errors on the SAR and adding more schools, if necessary. Also, if the applicant specified "Will File" with regard to their federal income tax returns, the To Do list should include a reminder to update the FAFSA after their federal income tax returns have been filed. Some of this appears on page 3 of the SAR, but it is incomplete and should be made more prominent by moving it to the first page of the SAR.	11.aaag: 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 Free Application for Federal Student Aid (FAFSA®).
	11.aaah	On page 4, why is there a "Combined Loans" line?	11.aaah: The data used in the example SAR are for mockup purposes only and are not intended to be accurate.
	11.aaai	On page 4, under "Federal Perkins Loans", there should not be a 2023-2024 Award Year Loan Amount, as the Federal Perkins Loan program ended on September 30, 2017, with the last loans made during the 2017-18 award year.	11.aaai: The data used in the example SAR are for mockup purposes only and are not intended to be accurate.
	11.aaaj	Some of the field values are cryptic, such as "1 st BA". Please consider spelling out this information, so it is easier for applicants to understand.	11.aaaj: No Change. The Department of Education considers this suggestion a stylistic preference.
	11.aaak	On page 6, AGI is listed as \$1,355,000 and taxes paid as \$1,113,012. Not only is this unrealistic for most students, but it is inconsistent with the zero EFC. It is also inconsistent with the student and spouse's income earned from work of \$1,250,000 and \$1,100,000, respectively. There are similar problems on the sample SAR Acknowledgement.	11.aaak: No Change. See comment 11.aaai .
	11.aaal	On page 7, question 40(a) Education Credits lists \$12,000. The education tax credits are extremely unlikely to be that high. That would require at least five children in college at the same time. Maybe set it to \$2,500, the amount of the maximum American Opportunity Tax Credit for one child in college.	11.aaal: No Change. See comment 11.aaai .
	11.aaam	On pages 8 and 9, some information is provided for the student's parents, even though the student is married and homeless, and, therefore, independent. It would be better to provide a more realistic SAR for a dependent student. If there are concerns about the potential for confusion with a real SAR, just	11.aaam: No Change. See comment 11.aaai .

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		watermark it as a SAMPLE. A similar issue applies to the SAR Acknowledgement.	
1 2		I'd like to see the tabs for the award years swapped when there are two FAFSAs available for the student to do. The current award year should be the left/first tab. As it stands, the default FAFSA that presents itself for a student to fill out is for the future award year. Most of my students do the wrong award year (don't read all of the words) and have to be called to do the correct one. This causes a delay in their education at the best case of a couple of weeks. Even worse, my school's third-party servicer claims that they cannot get us the future award year's ISIRs until the end of the calendar year. Thus, as many as three months could elapse before we know that a student has shown an interest in our programs. We are a clock hour school that enrolls weekly. This delay hurts both students and the school. If the change can't be done by this October, hopefully as soon as possible. Thank you for the consideration.	12.: No Change. The Department of Education believes this format aligns with current industry design standards and best practices.
1 3	13.a	Comments and Suggestions for FAFSA Incarcerated Applicant Form Question #16: What is your marital status as of today? Provide an option for incarcerated students that explains their marital status more clearly and can be reflected in the financial section of the application. This should also release their spouse's obligation to provide financial documentation on the FAFSA, which is a significant barrier to completion of the application for incarcerated students. For example, "I am married but have been separated from my spouse due to incarceration."	13.a: No change. Marital status is dependent on legal status and is determined by State law. If the State in which the applicant is a resident provides that incarceration is automatically legal separation, then a FAFSA applicant may indicate that they are separated.
	13.b	Questions #45-#57 Step Three (Student): This section allows for students to skip the parent information section if they answer "yes" to any one of the listed questions. They qualify as independent students and can move forward with the application process. However, students who are under the age of 24 are considered dependent students if they do not answer yes to any of the questions listed in 45-57. They would require parent's financial information on the FAFSA. For the Incarcerated Applicant Form, another qualifying question that could improve the application process is allowing a pathway for these students to become independent based on their incarcerated status. More than 50% of their care and living expenses are provided by other means and not by parent income. We suggest removing this barrier to completing the application process by creating a way for a dependency override for incarcerated students under the age of 24 to exist within the Incarcerated	13.b: No change. Dependency status is defined by statute. Section 480(d) of the HEA provides the definition of an independent student.

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		Student application process.	
	13.c	Removal of Question #21, #22, #23 is strongly supported. We are in strong favor of the Simplification Act and its goal of decreasing the number of questions on the FAFSA Application as well as on the Incarcerated Student FAFSA Application.	13.c: Refer to response for comment number 11.ad .
1 4	14.a	2023 – 2024 FAFSA Changes Custodial Parent FAFSA Definition The current FAFSA definition of custodial parent has been provided to families for many years and in most cases, it has been able to assist people move forward. Since the cost of housing is so expensive, to go along with running a household each day, the parent that the student lives with is the custodial parent. This is regardless of which parent has the higher income. This current approach seems to be effective in successfully completing the FAFSA.	14.a: Thank you for your comment.
	14.b	Lower Income Parent on FAFSA Temptation The concern of families trying to select the parent with the lower income, in an attempt and assumption that Pell Grant funds will be the end result, is legitimate but balanced by other double checks in the broader financial aid and college system, to include state grant residency reviews. State Grant programs check for state residency and so do college registration and records offices, to determine in state or out of state tuition charges. If one parent lives in Chicago, Illinois, where the child attended high school, and the other parent lives in Detroit, Michigan, these other checks build in a safeguard from potential fraud in FAFSA completion.	14.b: Thank you for your comment.
	14.c	Claimed on Parent Taxes A divorce agreement might require parents to rotate claiming the student from year to year. One parent might work a job and the other one could be on disability benefits. Many lower income families are under the false assumption they cannot claim their child on their taxes once they are 18 and an adult. This results in both parents not claiming a college student on their taxes. If the custodial parent does not have work income and they live with the student, in an auntie's home for an example that works full time, the aunt might claim the student on her taxes. For these reasons lower income, middle income, and higher income families, to go along with financial aid administrators, will not be able to effectively rely upon this approach to finalize a financial aid file.	14.c: Thank you for your comment.
	14.d	Homeless and Unaccompanied Youth Students The plan to rollover the prior year's FAFSA dependency status to the next FAFSA is a great idea and will assist students and financial aid administrators complete financial aid awards in a	14.d: Thank you for your comment.

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		timely manner. Making a student independent versus seeing them as homeless is a long-term financial aid office practice. This will be a large shift in thinking and a refresher professional judgement session tailored to this change, would be helpful. From my state financial aid agency work, we are already dealing with homeless student documentation on a regular basis.	
	14.e	Provisional Independent Status This has the potential to place students, financial aid administrators, high school counselors and college access advocates in an all-out disagreement about who makes the final decision and the overall process. It could also lead to very negative newspaper articles about the financial aid process being too complicated. This proposal can lead to mass confusion as well and not met the goal of making the financial aid process easier for students and families.	14.e: Thank you for your comment.
1 5	15.a	As an organization that advises thousands of students from low-income households every year to support them in filling out the FAFSA, we offer these suggestions based on the questions we frequently get from the students we advise. Thank you for the opportunity to share feedback.	15.a: Thank you for your comment.
	15.b	FAFSA Log In Page The FAFSA login buttons should be reduced down to one. There is no significant difference between a student saying they want to start or log in. They lead to the same place. But students who don't know which button to click get confused.	15.b: No Change. The Department of Education considers this suggestion a stylistic preference.
	15.c	FAFSA Questions --We applaud removing the selective service question. We suggest that Dept. of Ed provide resources through other means to ensure students know Selective Service is still a legal requirement for males between the ages of 18-24. For years, students have relied on using the FAFSA to register.	15.c: 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 Free Application for Federal Student Aid (FAFSA®).
	15.d	--Can we remove the driver's license number and state? This question isn't required and is skipped by the majority of students.	15.d: 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 Free Application for Federal Student Aid (FAFSA®).
	15.e	--Questions about the highest level of education should include clarification for students who have parents who completed their education in other countries.	15.e: No Change. The responses to these questions have been carefully selected in consultation with the states since use of the

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		We consistently get questions about how to answer that question if parents completed college elsewhere.	responses varies by state.
	15.f	--Increase the capacity for the college list on the FAFSA. While this impacts a small percentage of students that fill out the FAFSA each year, it is a burden for these students and there doesn't seem to be a reason to limit the number of colleges.	15.f: 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 Free Application for Federal Student Aid (FAFSA®).
	15.g	--Tax filing status question responses do not align with the options provided by the IRS - should be "Married filing jointly" and "Married filing separately"	15.g: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	15.h	--Please allow for electronic signatures for the signature page.	15.h: 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 Free Application for Federal Student Aid (FAFSA®).
	15.i	SAR Many students we work with qualify for the simplified needs test and take the simpler path through the FAFSA. Once they receive the SAR they find that questions that they were eligible to skip are marked with an "h", assuming their answer is "0", and direct the student to go back in and edit if the "0" is wrong. Many times it is wrong and creates additional work for students who were eligible to skip those questions.	15.i: 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 Free Application for Federal Student Aid (FAFSA®).
1 6		The draft 2023-24 FAFSA does not include the gender question. We track how many males and females file the FAFSA on a yearly basis and without this question on the FAFSA we will no longer have access to that data. Please keep this question.	16: Refer to response for comment number 11.ad .
1 7	17.a	FSA has indicated that as of the 2023-24 FAFSA year the homeless youth questions will become renewable questions on the FAFSA so applicants need not respond each year. However, the question is still worded homeless on or after July 1, 2022. If this question is going to be automatically answered, the timeline for determining homelessness needs to be reevaluated (have you been homeless any time after turning 13, for example, would align with the other dependency status determinations. Homelessness reflects a period of	17.a: The Department of Education has made this change to improve usability by carrying answers forward from the prior year, the same way other dependency questions are pre-populated. Similarly to other pre-populated dependency questions, it is up to the applicant to change the answers if they are no longer correct.

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		time, not necessarily a permanent condition.	
	17.b	Additionally, it would be less confusing if there was one question regarding homelessness, instead of 3. The space on page 10 of the paper FAFSA could be used to explain the 3 ways to be considered homeless based on the current questions.	17.b: 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 Free Application for Federal Student Aid (FAFSA®).
1 8		Anything that can be done to better explain that the question: "58. As of today, what is the marital status of your parents?" Perhaps "parents listed on the FAFSA" or "FAFSA parent" ...We continue to have so many students who answer this question as if it is asking about their biological parents. Then when the tax filing status doesn't match, we need to do additional follow up. It's more burdensome than verification at this point.	18: No Change. The Department of Education believes the current instructions provide adequate guidance.
1 9	19	On April 1, 2022, the Department of Education issued a general announcement (GENERAL-22-02). This announcement tells aid officers that "alimony payments/spousal support" should be reported as untaxed income in the "other untaxed income" FAFSA questions, which in the draft 2023-2024 FAFSA are Q41h and Q89h. I would recommend adding this to the FAFSA so that the language in the FAFSA is consistent with the language in the Application and Verification Guide and the intent of the announcement.	19: Thank you for your comment. The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
2 0	20.a	1. Homeless youth questions 52-54. It is positive news that the Department is proceeding to implement the changes of the FAFSA Simplification Act for students experiencing homelessness or at risk of homelessness, including allowing answers to 52-54 to be renewal eligible. However, the Department should clarify that the student's answers to these questions for a preceding award year will automatically be renewed unless (A) the student informs the institution that circumstances have changed or (B) the institution has specific conflicting information about the student's independence and has informed the student of this information. It should also address students who are transferring to another institution and mention that a financial aid administrator can use a determination from another institution in accordance with the FAFSA Simplification Act.	20.a: Refer to response for comment number 11.ad .
	20.b	The associated "help text" on FOTW for these questions is also an important source of information for applicants and should be reviewed, adjusted, and	20.b: No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with

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		simplified. For example, the text should be different for students submitting a renewal FAFSA vs. a first-time filer, with renewal FAFSAs indicating the new policies described above regarding earlier determinations or that determinations from another institution in a prior award year can be used.	pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the Free Application for Federal Student Aid (FAFSA®).
	20.c	2. Students unable to provide parental information. The FAFSA Simplification Act significantly expands the options for students unable to provide parental information, and the Department should implement them immediately. The Department should update any of the text appearing on page 10 of the paper PDF, under “Notes for students unable to provide parental information on pages 6 and 7” and associated help text on FOTW, for example, that such circumstances are no longer “very limited” and a student does not need to follow up with a financial aid administrator to complete the FAFSA. In particular, the Department should pay special attention to the circumstances in which the student is (A) not able to contact their parent, regardless of whether they know where the parent lives, (B) is estranged from their parent, or (C) has been abandoned by their parent – all of which are expanded options for applicants.	20.c: Refer to response for comment number 11.ad .
	20.d	If a student skips any of the parental information, FOTW should provide contextualized information to the student about their ability to proceed without the parental information, and avoid sending confusing error messages that would suggest a student does need to complete these sections. To fulfill Congressional intent, the Department should allow all students who find themselves in such situations broad latitude to complete the FAFSA and should always strive to provide students the benefit of the doubt. For example, a student’s request for a determination should be honored unless – like the homeless youth protocols – the (A) student informs the institution that circumstances have changed or (B) the institution has specific conflicting information about the student’s independence and has informed the student of this information.	20.d: No Change. The Department of Education believes the current instructions provide adequate guidance.
	20.e	3. Questions 45 & 46: military and veteran status. In accordance with the FAFSA Simplification Act, all applicants should be asked whether they are on active duty or are a veteran of the armed forces – regardless of whether the applicant has already been identified as independent. This information is critical to developing demographic outcome information in student aid programs and protecting veterans and service members.	20.e: Refer to response for comment number 11.ad .

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	20.f	4. Date parents were married, widowed, separated, or divorced. This information is not required by federal law, adds confusion for students, and should be eliminated. Consistent with the legislative intent of the FAFSA Simplification Act, the Department should remove unnecessary questions.	20.f: Refer to response for comment number 11.ad .
2 1		The term "Estimated Family Contribution" is confusing for many parents and students. It perpetuates the idea this is how much the student or family will pay for college. The term should be changed so it is clear and unambiguous.	21: Refer to response for comment number 11.ad .
2 2		I do not support the change to EFC. Our family's EFC is laughably high to begin with. I have never spoken to a family that said "the EFC provided by the government is what I expected we could spend each year". It is almost a guarantee that 95% of students and/or their family's will have to take out loans for college even with the current EFC model. Our family earned less than \$100k, still owe on our home, have very little in savings, and yet our EFC is over \$19,000. If you want your 40-60 year olds to have any hope of saving for retirement, telling them 20% of their income can be spent PER CHILD on college is insanity. At the very least, the EFC number should be divisible by the number of children in college at the time. Next year when my 2nd child begins college, there is zero chance that we can pay 40% of our income on college. Luckily, we only have two children. Families of four will just need to move into a cardboard box I guess.	22: Thank you for your comment.
2 3	23.a	Keep and expand the question that asks applicants to indicate their gender. The proposed elimination of a gender question would make it more difficult to disaggregate data and track FAFSA completion trends by gender. We encourage the DOE to keep the question, with the addition of inclusive gender options.	23.a: Refer to response for comment number 11.ad .
	23.b	Eliminate separate form for students who are incarcerated. There is a separate version of the FAFSA for incarcerated students that requires identical information to the standard FAFSA. This contributes to the stigma associated with justice-impacted students. We encourage the DOE to use one form.	23.b: Refer to response for comment number 11.ad .
2 4		As a parent who has filled out the FAFSA and someone who works at a college in Higher Ed, I have found the FAFSA very frustrating and look forward to the updates. Just last month when completing the FAFSA again (for the 7th year) you have the option of SAVING portions that you've completed. However, it does not ever ask you to create a new SAVE key. Despite entering all the info and saving it, you cannot retrieve it unless you have a SAVE key from previous	24: Thank you for your comment. A save key is created at start of each transaction and is specific to that transaction only - it is not meant to be used once the application or correction it is connected to is submitted. Users can retrieve a forgotten save key by following the instructions provided on the save key page on the web site.

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		years. If you can't find that, you are starting all over again when loggin in. There has to be a better way.	
2 5		The separate form for students who are incarcerated should be eliminated. No additional information is requested from these students and completing the standard FAFSA would be sufficient. This additional form is superfluous paperwork and contributes to the stigma that justice-impacted students face. I encourage you to use just one form for all students regardless of their justice-impacted status.	25: Refer to response for comment number 11.ad .
2 6	26.a	Per previous iterations of the FAFSA application, the question where applicants were asked to report their gender provided incredibly helpful data to financial aid practitioners. Rather than removing the question entirely, expand it to include more gender-inclusive options. This helps students feel heard, reinforces their identity, and it also helps practitioners better understand where gaps in applications are. Help us help our students!	26.a: Refer to response for comment number 11.ad .
	26.b	Can the DOE also provide some clarity on the utility of a separate form for incarcerated students? These forms contain the same information only to be kept separate or at minimum duplicate work if the wrong form is attempted. This practice contributes to the stigma incarcerated students face.	26.b: Refer to response for comment number 11.ad .
2 7		My concern is with the fact that the number of family members in college will no longer be part of the calculations. As a family that will have 3 children in college for at least 4 consecutive years, I don't understand how that doesn't affect the equation. It should affect the equation and what federal financial aid (grants, loans) and institutional aid (they use the EFC to calculate it) students are eligible for.	27: Thank you for your comment.
2 8		Please consider delaying FAFSA change as parents of current teens have not had enough time to prepare for it. We have twins graduating HS 2023 and the FAFSA change will have a negative impact on our ability to fund college. This impending change will pose additional challenges for those currently enrolled in college. This significant financial change in financial responsibility may result in a sea-change of students transferring to more affordable college disrupting the learning process. If enacted should be effective for kids being born right now so that parents have adequate time to save.	28: Refer to response for comment number 11.ad .
2 9		Taking away the stipulation that having multiple children in college allows families' EFC to be divided by the number of children in college with hurt our family. We have three children and they will be in college at the same time.	29: Thank you for your comment.

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		That is a HUGE financial burden on us. By dividing the EFC amount the children, we are able to get more aid, which our family separately needs. Thank you.	
30		I strongly urge you to keep and expand the question that asks applicants to indicate their gender. The proposed elimination of a gender question would make it more difficult to disaggregate data and track FAFSA completion trends by gender. I encourage the DOE to keep the question, with the addition of inclusive gender options. I also support eliminating the separate form for students who are incarcerated. There is a separate version of the FAFSA for incarcerated students that requires identical information to the standard FAFSA. This contributes to the stigma associated with justice-impacted students. I encourage the DOE to use one form.	30: Refer to response for comment number 11.ad .
31	31.a	I would like to comment on the 2023 -2024 FAFSA application form. As I go through my own personal growth, learning and understanding of the various groups and communities within this country, I see a need to recognize a community and provide them with an options to self-identify based on preferred names or pronouns. Gender identity needs are only going to increase with time. As FAFSA has progressed through father/mother to "parent," so too should FAFSA become a place where students can self-identify by their preferred name or pronoun.	31.a: Refer to response for comment number 11.ad .
	31.b	<p>Obviously for the SS match to take place, students must list their legal name and birth marker (unless legally this has been changed). For students where their legal name and birth marker do not equate with who they identify with, FAFSA could provide an area within the FAFSA to report this information if they so choose. Perhaps where they must list their birth marker, an additional question could be asked if they wish to provide their pronouns with skip logic. Y, it opens a box, or N, it bypasses. Another option is asking students to provide "preferred name" or pronouns where students list email information. This not only gives students an opportunity to provide information about who they feel they are, but it gives school administrators like myself additional background information that may not be available to us through other campus system means.</p> <p>I bring up this suggestion because of the increased litigation that we are seeing with regards to misidentification, students feeling powerless, and staff unaware or unable to keep up with the cultural changes that are happening</p>	31.b: Refer to response for comment number 11.ad .

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		<p>around them. I myself am going through a Title IX complaint regarding misuse of pronouns that were not made available to me. The student in my situation had their birth marker listed, and all "legally required" names and identities were all that were made available to me. It would have been nice to look on a FAFSA application (ISIR) and see a preferred name or pronoun before even having a (phone) appointment with the student in my situation. As part of this learning experience, I am reaching out to our lawmakers to consider this increasing trend of students who do not identify with their birth marker. Did you know that three out of every ten adults in the US personally knows someone who is transgender. This group will only increase its visibility over time, so there is no sense ignoring this topic, and giving administrators an extra tool does no harm.</p>	
	31.c	<p>The foundation of financial aid is to provide a lift to those families and students who would otherwise not be able to attend college without financial assistance. With that said, approximately 29% of trans adults live in poverty, as well 39% of Black trans adults, 48% of Latinx trans adults and 35% of Alaska Native, Asian, Native Americans and Native Hawaiian or Pacific Islander trans adults. These adults were once our youth, and it's time we recognize their hardship and provide them with the dignity of "identity" at the time they file their FAFSA application, making this process one that "invites them in" to their educational experience, and reduces the risks of complaints regarding gender identity. I have depression, fear, anxiety, and felt gut punched after 32 years of assisting students, only to have a gender identity harassment complaint that may have been avoided had the student had an opportunity to provide this information on the FAFSA application, and it was made available to me to review prior to speaking with them.</p> <p>Financial Aid Administrators are going to have increased contact with students in the LGBTQIA2S+ communities, and it is a topic we need to address and provide a remedy for these students to provide preferred identity options.</p>	31.c: Refer to response for comment number 11.ad .
3 2		<p>FAFSA Questions 41f and 89f ask the applicant to report, among other things, housing allowances. Questions 41h and 89h instruct the applicant NOT to report the foreign income exclusion. The 2021 tax return includes a new line for "Housing deduction from Form 2555" on Schedule 1, line 24j, which is part of the foreign earned income exclusion for housing and other costs related to</p>	32: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.

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		<p>the taxpayer's living overseas. A different housing deduction (called the housing exclusion) is included with the general foreign earned income exclusion on Schedule 1, line 8d, and is not broken out from the general foreign earned income exclusion.</p> <p>Since the line 24j housing deduction is part of the foreign earned income exclusion, I assume it should not be reported as untaxed housing income in FAFSA questions 41f and 89f. If this is correct, please add Schedule 1, line 24j as an item not to be included in these questions. This will clarify for applicants and aid officers that this item is not untaxed income, and it would be equitable in that people who report their housing exclusion on line 8d will not report that item as untaxed housing.</p>	
3 3		<p>The request for information on Education Credits is misleading or inaccurate. (lines 88a, 40a) It seems to indicate that education credits will be excluded from income in the FAFSA calculation. It says to include the information from 1040 Schedule 3 line 3. That line item only includes nonrefundable education credits. It does not include refundable American Opportunity Credit. Either the wording is misleading or the refundable Education Credit should also be transferred from the IRS.</p>	<p>33: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>
3 4		<p>FAFSA and Higher ED is priced so high that it is a deterrent to making Michigan GREAT! It is consistent with a system that makes access to financial security and success limited to those who already have financial security and an obstacle for everyone who can not afford it. Also, forms requiring race, gender, and ethnic disclosure is separatist in nature and does not treat all people equally. These should be eliminated or an option in all three categories should be "prefer not to say".</p>	<p>34: Thank you for your comment. The FAFSA Form is free to complete and submit. Also, refer to response for comment number 11.ad.</p>
3 5		<p>According to recent reports, students (on average) spend between \$26,000-\$30,000 just for loans (including renewing Financial aid paperwork each term) after graduation, she usually ends up with almost \$50,000 in debt. Other expenses include: money for food + rent at the dorm + bus fare each way to-from class; if dorms are on campus. That includes money she needs to spend on new clothes (as well.)</p> <p>Or, money for gas if she's able to drive to-from class. Plus, separate fees that apply each month if Wi-Fi is available on Campus... like if she needs to use her</p>	<p>35: Thank you for your comment. The FAFSA form is free to complete and submit and can be used to apply for a variety of financial aid options.</p>

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		<p>laptop at the dorm after class for reviewing notes. To avoid going into debt and keep her budget from going into the red zone, most girls choose to opt-out when the term ends.</p> <p>If she started in the Fall term, she might opt-out before the Spring semester begins.</p>	
3 6		<p>In reviewing the draft 23-24 documents, I'm not seeing the changes that were supposed to be on the 23-24 FAFSA. The number of questions hasn't been reduced and the Student Aid Report still says Expected Family Contribution. Isn't that now supposed to be called Student Aid Index? The draft documents look very similar to the current FAFSA. Also, can you PLEASE have an electronic Student Aid Report demo available? 99.9% of students we work with submit the FAFSA electronically. A paper Student Aid Report looks completely different than an electronic SAR. We need a sample electronic SAR to show students what it should look like.</p>	36: Refer to response for comment number 11.ad .
3 7	37.a	<p>On behalf of the National College Attainment Network, I would like to provide the following comments that may increase the usability and efficiency of the Free Application for Federal Student Aid (FAFSA) for the 2023-2024 academic year.</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> <ol style="list-style-type: none"> 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). 	37.a: No change. The level of security requirements when verifying a user's ID before retrieving data via the IRS DRT is mandated by the IRS. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
	37.b	<ol style="list-style-type: none"> 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 	37.b: No Change. Currently, a user who indicates they have a high school diploma is taken to the Add a High School page where they are

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		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 districts.	required to search for their high school by providing the state in which their high school is located (city and high school name are optional). Once the search results display, the user is directed to select their high school from the results and is then taken to the Confirm Your High School page. From this page, they select Continue to confirm and add their school to their FAFSA form. A user is only able to add their school manually if they are unable to find their high school in the search results.
37.c		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.	37.c: 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 Free Application for Federal Student Aid (FAFSA®).
37.d		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.	37.d: 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 Free Application for Federal Student Aid (FAFSA®).
37.e		<p>Selective Service Recommendations</p> <p>NCAN supports the recent separation of Selective Service registration from federal student aid eligibility. However, many states maintain a Selective Service registration requirement for state aid programs as well as state resident students qualifying for in-state tuition. Without a full understanding of how states will gather this information in the future and to reduce the burden on students, NCAN recommends:</p> <p>1. As an optional question at the end of the form, maintaining a question that allows students to confirm they are registered, have their name forwarded to Selective Service for registration immediately or upon turning age 18. The response to this question would then be provided to the state agencies to facilitate efficient processing of state aid or tuition.</p>	37.e: No Change. The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
37.f		Incarcerated Student Paper FAFSA Form	37.f: The Department of Education is researching all available options

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		<p>NCAN assumes that having a draft FAFSA titled “Incarcerated Applicant Form” indicates that there will be two versions of a paper FAFSA. After reviewing this form and the standard paper FAFSA, the only difference appears to be the PO Box number and zip code in the mailing address. To reduce confusion for students who may need to file the paper form, NCAN recommends:</p> <ol style="list-style-type: none"> 1. There be only one version of a paper FAFSA for the 2023-2024 applicant year. 2. In the “Mail Your FAFSA Form” section of instructions, add a sentence to note the different PO box mailing addresses. This may read - Please note that there is a different mailing address for incarcerated students who are submitting this form. Those students should mail the original of pages 3-8 to P.O. Box 7657, London, KY 40742-7647 	<p>and has referred this suggestion to the appropriate business unit to review recommendations.</p>
38	38.a	<p>Dear Colleagues:</p> <p>Pursuant to notice the U.S. Dept of Education published posted February 24, 2022 regarding 2023-2024 FAFSA collection activities, open for comment until April 25, 2022, the Ohio Department of Higher Education respectfully submits the following requests:</p> <ol style="list-style-type: none"> 1.Request Removal of Vocational Schools from FAFSA Selection Choices for Students <p>Ohio high school seniors (and other FAFSA applicants) currently may select their vocational school rather than the high school of record in the school district where they reside. Practically speaking, this means a student intending to graduate from Hilliard Davidson HS could incorrectly report Tolles Career Technical Center as their high school on the FAFSA. This results in a FAFSA completion undercount for Hilliard Davidson HS, making FAFSA building counts inaccurate. We rely on the accuracy of this data to motivate schools to increase FAFSA completion rates. Inaccurate data jeopardizes these gains.</p>	<p>38.a: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>

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		<p>The State of Ohio considers all vocational students to be students assigned to their residential district high school, not a career technical (CTE) school often shared by multiple LEAs. The State of Ohio has no ability to disaggregate a student who selects Tolles rather than Hilliard Davidson.</p> <p>Collectively, this data error can reduce the accuracy of district-level FAFSA completion rates by as much as 2-4% in Ohio and reduce public trust in FAFSA tracking data.</p> <p>Proposed solution: The State of Ohio requests that the selection menu for Ohio students solely offer high schools of record, and not allow Ohio CTE schools to be selected. The positive impact could be an improvement estimated at 2-4% in accuracy for headcount for FAFSA dashboards. This will become important as we seek to engage schools, parents and students. The State of Ohio is willing to help FSA identify the correct list of Ohio high schools each year.</p>	
38.b		<p>2.Request that FSA Keep the Selective Service Question on the FAFSA</p> <p>FSA no longer requires FAFSA applicants to attest to having met the federal selective service requirement for all males 18+ in the United States as a prerequisite for federal Pell grants. We understand FSA may remove this question from the FAFSA, even though many IHEs (including in Ohio) are required by statute to verify selective service enrollment before a student may qualify for in-state tuition and state financial aid.</p> <p>In the absence of this question on the FAFSA, IHEs must independently verify selective service registration. FSA could instead continue to ask the question simply to maintain the information for states and alleviate additional burdens on IHEs. This would have no effect on the policy change for Pell grant eligibility.</p> <p>Proposed solution: The State of Ohio requests that FSA continue to include SS as an optional question on the FAFSA.</p>	38.b: Refer to response for comment number 11.ad .
38.c		<p>3.Request auto-complete and/or drop-down list selection rather than applicant typing HS</p> <p>FAFSA applicants in Ohio currently have the option to type or search the name</p>	38.c: Refer to response for comment number 37.b .

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		<p>of their high school. Practically speaking, this means a student who attends Gahanna Lincoln High School may type “Gahanna High School”, “Lincoln High School”, “GLHS” or any number of other iterations, including misspellings, when identifying their school building. This can result in data errors and a FAFSA undercount for impacted schools. We need reliable FAFSA data.</p> <p>Proposed solution: The State of Ohio recommends that FSA consider implementing a user interface that encourages families/students to use a search feature (auto-complete or drop-down menu) when selecting and identifying the high school instead of typing the name of the school in the system. The State of Ohio would be willing to help FSA verify an official list of high schools including public, community, STEM and nonpublic to keep this list current.</p> <p>FSA may wish to consider removing the ability to type the name altogether as this increases the likelihood of mislabeling the high school. This improvement could increase the accuracy of FAFSA counting dashboards.</p> <p>The State of Ohio appreciates the efforts undertaken by U.S. DOE and FSA to consider improvements to the FAFSA system.</p> <p>To the extent possible, the State of Ohio encourages FSA to utilize modern technologies to minimize the family and student burden of completing information that could be automatically populated following a signature authorization. We are making progress with FAFSA simplification but we can do more.</p> <p>Automating student eligibility determinations for federal student aid could be among the most supportive actions the federal government could make for at-risk students across the United States.</p>	
3 9	39.a	<p>I am writing on behalf of the National Association of State Student Grant and Aid Programs (NASSGAP). Collectively, our members award over \$13 billion in grant and scholarship aid to students pursuing postsecondary education. Most of this aid is awarded via a process which begins with FAFSA completion, and many of our members are actively involved with local high schools to</p>	<p>39.a: 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 Free Application for Federal Student Aid</p>

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		<p>encourage and assist in FAFSA completion events.</p> <p>NASSGAP solicited feedback from its members on the draft 23-24 FAFSA. Member states have different viewpoints and even some conflicting positions. The goal of our comment is to provide Federal Student Aid with the various perspectives of our member states.</p> <ul style="list-style-type: none"> • We think the question that asks about Federal Work Study should be removed. Students don't even really understand the question or the implications of how they answer it. When I worked in a financial aid office, we ignored the question because of that, and other colleagues have mentioned that they do the same. They are always looking to reduce the number of questions and we think this is a good one to eliminate. 	(FAFSA®).
39.b		<p>We know that asking for a question to be added is problematic. However, we think there would be great benefit to adding a question that asks for students high school graduation year. When filtering data, we must make assumptions regarding who is a high school senior (using date of birth and grade level as proxies). However, we know the result is still not accurate. NCAN and others have to do the same. Adding high school graduation date would allow us to be able to accurately determine the FAFSA filing levels for each graduating class on an ongoing basis and assist when gathering various types of data.</p>	39.b: 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 Free Application for Federal Student Aid (FAFSA®).
39.c		<p>Remove the Driver's License question</p>	39.c: 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 Free Application for Federal Student Aid (FAFSA®).
39.d		<p>We do not want to see the gender question removed or unavailable. We absolutely use this data to help us focus our outreach efforts (like most states, our young men file at a much lower rate than our young women). Our preference would be for the gender question to continue to be asked, for the options to be expanded and for that data to be shared.</p>	39.d: Refer to response for comment number 11.ad .
39.e		<p>Looking at the draft FAFSA form for 23-24, I see the gender question is removed due to removal of selective service requirements. The new FAFSA simplification form (in 2-3 years) requires the race/ethnicity question be</p>	39.e: Refer to response for comment number 11.ad .

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		added. Both are really important pieces of data in an ISIR record to have for reporting/equity purposes.	
	39.f	We do not need gender/race/ethnicity to award aid. However, we would land strongly in the camp that gender/race/ethnicity data is desirable “for research to promote college attendance, persistence, and completion and for purposes of wraparound services and equity efforts.”	39.f: Refer to response for comment number 11.ad .
	39.g	It appears that “sex” of the applicant is information which is required to be provide per the FAFSA simplification language in the Consolidated Appropriations Act of 2020. https://rules.house.gov/sites/democrats.rules.house.gov/files/BILLS-116HR133SA-RCP-116-68.pdf	39.g: Refer to response for comment number 11.ad .
40	40.a	The undersigned organizations submit these public comments on the 2023-2024 Free Application for Federal Student Aid (FAFSA) with a specific focus on youth experiencing homelessness and youth with experience in foster care.	40.a: Thank you for your comment.
	40.b	Our organizations have extensive expertise in the FAFSA, as well as direct experience assisting young people to fill out the FAFSA and responding to questions from K12 educators, service providers, child welfare agencies, and financial aid administrators. We have witnessed the trauma and stress caused by burdensome FAFSA requirements, and the negative impact on college access and retention for these vulnerable but resilient and talented young people. The pandemic and associated economic crises have exacerbated youth homelessness and the barriers that homeless and foster youth face in obtaining documentation and in receiving the in-person assistance they need to complete the FAFSA. Yet higher education remains their strongest path to a more secure future.	40.b: Thank you for your comment.
	40.c	If implemented robustly, the FAFSA Simplification Act (enacted as part of the Consolidated Appropriations Act, 2021) will remove many of the barriers faced by youth experiencing homelessness and youth with experience in foster care. While most of the implementation of the FAFSA Simplification Act has been pushed back to the 2024-2025 award year, Congress expressly gave permission to the U.S. Department of Education (ED) in the Consolidated Appropriations Act, 2022 to implement provisions for homeless and foster youth as soon as the 2023-2024 award year.	40.c: Refer to response for comment number 11.ad .
	40.d	We urge ED to take every possible step to implement these provisions as soon as possible, including incorporating them on the 2023-2024 FAFSA. In	40.d: Refer to response for comment number 11.ad .

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		<p>particular, we urge that the following FAFSA Simplification changes be reflected on the 2023-2024 FAFSA.</p> <p>Presumption of independent student status in subsequent years.</p> <p>Currently, youth must document that they are an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting, each year that they apply for financial aid. This requirement delays aid, and is often retraumatizing for students who must re-explain and re-document their situation. Students with experience in foster care must similarly provide documentation each year despite the fact that their status by definition does not change.</p>	
40.e		<p>Under the FAFSA Simplification Act, any student who is determined to be an unaccompanied homeless youth, or a former foster youth, for a preceding award year is presumed to be independent for each subsequent year at the same institution, unless the student informs the institution that circumstances have changed, or the institution has specific conflicting information about the student's independence, and has informed the student of this information.</p>	40.e: Refer to response for comment number 11.ad .
40.f		<p>The homelessness questions as drafted ask if a youth received a determination of their status "on or after July 1, 2022." We believe that a "prior prior" award year would be an appropriate interpretation of "preceding" award year for purposes of receiving a renewal in accordance with the FAFSA Simplification Act. We therefore urge ED to change the date to "on or after July 1, 2021."</p>	40.f: Refer to response for comment number 11.ad .
40.g		<p>The FAFSA Docket indicates that answers to questions 52-54 for youth experiencing homelessness or at risk of homelessness are "renewal eligible," but it is unclear if this means "will be renewed" or "can be renewed." Further, it is unclear how this information will be conveyed to students. We urge that the Notes section of the FAFSA provide clear information on previous year determinations.</p>	40.g: No change. Any applicant completing a FAFSA renewal, beginning with the 23-24 cycle, will have the answers to questions 52-54 carried over from the previous cycle. Renewal FAFSA forms can only be completed online.
40.h		<p>In addition, the Consolidated Appropriations Act, 2022 allows for the presumption of independent status to be carried over from year to year for both foster youth and homeless students. We urge that in addition to questions 52-54 being renewal eligible, question 49 (At any time since you turned age 13, were both your parents deceased, were you in foster care or were you a dependent or ward of the court?) be treated similarly.</p>	40.h: No Change. The answer to question 49 is already carried forward from the previous cycle when completing a FAFSA renewal application.

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	40.i	<p>2. Additional officials and programs are authorized to verify that an applicant is an unaccompanied homeless youth (and therefore an independent student).</p> <p>Homeless youth receive services from an array of providers and educators, yet many providers were not previously authorized to verify a youth's status as an unaccompanied homeless youth. Under the FAFSA Simplification Act, the following individuals are authorized to verify this status:</p> <ul style="list-style-type: none"> o School district homeless liaisons, or a designee of the liaison; o The director or a designee of a director of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals who are experiencing homelessness. o The director or a designee of a director of a program funded under a TRIO or Gaining Early Awareness and Readiness for an Undergraduate program ("GEAR UP") grant; o A financial aid administrator at the same or another institution who previously made a determination. <p>These changes make it easier for youth to receive a determination of homelessness from the types of individuals they are most likely to be in contact with, rather than the highly restrictive sources available under current law.</p> <p>The current FAFSA docket only describes the old sources of determination and, therefore, could significantly delay the benefit of the FAFSA Simplification Technical Corrections Act, which specifically allows these reforms to go online on time in 2023-24. We therefore urge ED to change the text of questions 52-54 on the paper FAFSA, and the screening questions on FAFSA on the Web, to be updated to reflect the new sources of determination. Even if only the online text can be updated for now, just as was done in 2016 with the change for homeless youth, this is a critical update.</p>	40.i: Refer to response for comment number 11.ad .
	40.j	<p>3. Determination by a Financial Aid Administrator (FAA).</p> <p>It is unclear what renewal would occur if a student got a determination through an FAA in a preceding award year. Since all the questions are now</p>	40.j: Refer to response for comment number 11.ad .

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		<p>renewal eligible, a previous determination by an FAA should be listed and then carried over. However, Screen 2 does not list an FAA option. If a student who previously got an FAA determination selected “None of the above,” it would then take them to Screen 3, which begins with “Your financial aid administrator can decide that you meet...” language. That would be confusing for a student who had already received such an FAA determination, and should not have to follow up with their FAA to receive a renewal, and may lead them to take an incorrect action. We ask that ED add an FAA option to the list of determination sources after question 54, and Screen 2.</p>	
	40.k	<p>4. Renewal for transfer students.</p> <p>Similar to above, the FAFSA Simplification Act and the FAFSA Simplification Technical Corrections Act expand the possibility of a financial aid administrator to use a determination from another institution to a preceding award year— not just the same award year. We urge that the FAFSA reflect this new option for students who are transferring institutions in either the body of the FAFSA, the help text, or both.</p>	40.k: Refer to response for comment number 11.ad .
	40.l	<p>5. Help text.</p> <p>The associated “help text” on FAFSA for the Web for questions 52-54 is also an important source of information for applicants and should be reviewed, adjusted, and simplified. For example, the text should be different for students submitting a renewal FAFSA vs. a first-time filer, with renewal FAFSAs indicating the new policies described above regarding earlier determinations or that determinations from another institution in a prior award year can be used. Since the current docket implies everything is derived from the 2022-23 FAFSA on the Web, we are concerned the help text is not going to be updated to reflect the changes in the FAFSA Simplification Act. Thank you for the opportunity to submit these comments. We look forward to working with you to help ensure that youth with experience of homelessness or foster care benefit from the provisions of the FAFSA Simplification Act.</p>	40.l: Refer to response for comment number 11.ad .
4 1		<p>I am writing on behalf of the Iowa College Student Aid Commission. Using elements from the FAFSA, we administer state financial aid for lowans pursuing postsecondary education. We also work diligently to improve FAFSA completion rates for high school seniors, particularly for students</p>	41: Refer to response for comment number 11.ad .

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		<p>underrepresented in higher education. The goal of my comment is to provide Federal Student Aid with our perspective on removing the gender question and adding the race/ethnicity question. I am in favor of adding the race/ethnicity question while I am concerned about the gender question being removed. In our efforts to close equity gaps in college enrollment, college persistence, and college completion, we consistently use demographic elements from our data sources, including the FAFSA, to monitor our progress on ensuring that Iowa is providing the same opportunities for all students. Removing this question limits our ability to focus our outreach efforts to specific populations, such as males who consistently file at lower rates than females. Our preference would be for the gender question to continue to be asked, for the options to be expanded, and for that data to be shared. With both race/ethnicity and gender captured on the FAFSA, future monitoring could identify gaps among the intersections of race/ethnicity and gender that would not be possible if the gender question was removed. I appreciate the consideration of my comments.</p>	
42		<p>I am applying for the Pell Grant for the Spring semester of 2023 at Lansing Community Michigan.</p>	<p>42: Thank you for your comment.</p>
43	43.a	<p>To whom it may concern, On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit to the U.S. Department of Education (ED) our comments on the 2023-2024 Free Application for Federal Student Aid (FAFSA), docket No.: ED-2022-SCC-0024. NASFAA represents nearly 20,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S.</p>	<p>43.a: Thank you for your comment.</p>
	43.b	<p>Removal of FAFSA question "Are you male or female"</p> <p>We are concerned about the removal of the question "Are you male or female?" Understanding that this information is no longer necessary for determining Selective Service System registration status, it is still essential for evaluating FAFSA completion trends. Further, some institutions use this information to match ISIRs to student records since many no longer collect Social Security numbers on their admissions applications.</p>	<p>43.b: Refer to response for comment number 11.ad.</p>

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	43.c	<p>Given that a FAFSA question on gender will be required for the 2024-25 award cycle, this one year lapse in FAFSA gender data will cause institutions to have to develop new systems to accommodate the missing gender data in 2023-24, only to have to make changes again for 2024-25 when gender data returns. Retaining the question for 2023-24 would result in the least possible disruption.</p>	43.c: Refer to response for comment number 11.ad .
	43.d	<p>Provisional Independent Student Status</p> <p>In separate joint comments with the Vera Institute for Institute for Justice on the Incarcerated Application Form, we recommend on-time implementation of provisional independent student status for incarcerated students. Given that there is no assurance that every incarcerated student will complete the Incarcerated Applicant Form instead of the regular FAFSA we recognize that, operationally speaking, it is likely preferable to implement provisional independent student status on-time for all students.</p>	43.d: Refer to response for comment number 11.ad .
	43.e	<p>In order to exercise this authority, the instructions on page 10 of the FAFSA would need to be updated to account for the possibility of provisional independent student status. The electronic version of FAFSA would also need to be updated to remove language stating the impact of not providing parent information. All versions of FAFSA would also require an additional question for students to indicate their desire to complete the FAFSA without parental information for the purpose of determining their Title IV student aid eligibility based on provisional independent student status.</p>	43.e: Refer to response for comment number 11.ad .
	43.f	<p>Summary of enhancements to electronic versions of the FAFSA/earnings instructions</p> <p>ED states that they have changed the instructions for reporting Income Earned from Work in questions 35, 36, 83 & 84 to be clearer, with the new text reading, "This information may be found on the W-2 forms or by adding up the following items: IRS Form 1040 - line 1 (or IRS Form 1040NR - line 1a) + Schedule 1 - lines 3 + 6 Schedule K-1 (IRS Form 1065) - Box 14 Code A)." There is a missing "+" sign between the "6" and the "Schedule K-1." The "+" sign is included in the summary of enhancements to the paper FAFSA and is presumably an error in the electronic form summary.</p>	43.f: Thank you for your comment. This will be corrected in the 30-day public comment period.
	43.g	These instructions, both in the electronic and paper versions of the FAFSA,	43.g: No Change. The Department of Education believes the

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		<p>could also benefit from adding brackets and replacing dashes with commas so as not to be confused with the subtraction symbol. Also, adding relevant boxes where earnings data can be found on the W-2 would add clarity to current instructions that indicate only that earnings can be found on the W-2 form, but not where on that form. Suggested text (including correction of the missing “+” sign) is:</p> <p>“This information may be found in Box(es) x on the W-2 forms or by adding up the following items: [IRS Form 1040, line 1 (or IRS Form 1040NR, line 1a)] + [Schedule 1, lines 3 + 6] + [Schedule K-1 (IRS Form 1065), Box 14 Code A].”</p>	instructions and help text provide adequate guidance.
	43.h	We appreciate the opportunity to comment on this proposed data collection.	43.h: Thank you for your comment.
	43.i	<p>To whom it may concern,</p> <p>On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, and the Vera Institute for Justice we respectfully submit to the U.S. Department of Education (ED) our comments on the 2023-2024 FAFSA Incarcerated Applicant Form, docket No.: ED-2022-SCC-0024.</p>	43.i: Thank you for your comment.
	43.j	NASFAA represents nearly 20,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S.	43.j: Thank you for your comment.
	43.k	The Vera Institute of Justice (Vera) is a national nonprofit organization that partners with impacted communities and government leaders for change. Vera’s Unlocking Potential Initiative has helped expand access to postsecondary education in prison by piloting solutions; partnering with the federal government, state corrections, and colleges; and successfully advocating for the repeal of a more-than-two-decade ban on Pell Grants for students in prison. Since 2016, Vera has been providing technical assistance to the network of Second Chance Pell sites which now includes 130 colleges across 42 states and Washington DC.	43.k: Thank you for your comment.
	43.l	The restoration of Pell grant eligibility for incarcerated students presents a new opportunity for this population that has been largely excluded from postsecondary education for nearly three decades. But it also presents significant challenges to ensuring that they are able to take advantage of their	43.l: Thank you for your comment.

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		Pell grant eligibility. Many of those challenges relate to the application itself, which was not designed with this population in mind. Simply giving the existing form a new name is inadequate. We suggest the following changes to tailor the Incarcerated Applicant Form to this population and their specific needs.	
	43.m	Revise language throughout the form that refers to non-Pell grant aid, unless ED confirms whether states or institutions will make aid available to this population	43.m: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.n	Application deadlines for states that do not provide funding for incarcerated students are unnecessary	43.n: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.o	Remove language instructing students to check with their high school counselor about other sources of aid and deadlines since it is not relevant to this population	43.o: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.p	Confirm whether black ink can be used at all correctional facilities or permit other colors to be used for this population	43.p: Change. The Department of Education is updating the instructions on Page 1 of the FAFSA form to accommodate the use of dark ink for this impacted population.
	43.q	Remove references throughout that refer to living expenses and room and board since those costs are not part of the cost of attendance for incarcerated students	43.q: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.r	Instructions for question 16 should better explain separated status, noting that it is not necessary for a separation to be official or legal in order to complete the incarcerated application form as separated, and that the circumstances of incarceration alone may justify use of separated status. Applicants who are incarcerated and who have experienced domestic violence may put themselves at risk by trying to obtain spousal information to complete the application; instructions should clearly instruct them on the proper use of separated status	43.r: No change. Marital status is dependent on legal status and is determined by State law. If the state in which the applicant is a resident provides that incarceration qualifies as a legal separation, then a FAFSA applicant may indicate that they are separated.
	43.s	Questions 21 and 22 may not be necessary if state and college aid are not available for this population	43.s: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.t	Remove question 28, since this population does not qualify for Federal Work Study	43.t: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.u	Add a question to the dependency status section of the Incarcerated Applicant Form to indicate their desire to complete the FAFSA without parental information for the purpose of provisional determination of their Title IV	43.u: Refer to response for comment number 11.ad .

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		<p>student aid eligibility.</p> <p>Update instructions to account for the possibility of provisional independent student status</p>	
	43.v	<p>Several dependency questions can likely be removed, such as:</p> <p>Question 45, since an individual presumably cannot be incarcerated while serving on active duty in the US Armed Forces.</p> <p>Question 48, since an incarcerated individual cannot have dependents living with them</p> <p>Question 90, since an incarcerated individual does not live with others who they support</p> <p>Question 91, since household size would presumably always be 1 for this population</p> <p>Question 97, since individuals who are incarcerated do not appear to meet the dislocated worker definition</p>	43.v: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.w	The Housing Plans portion of Question 98 is not necessary for this population	43.w: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	43.x	In the Consolidated Appropriations Act of 2022, Congress authorized on-time implementation of provisional independent student status that was authorized by the FAFSA Simplification Act as part of the Consolidated Appropriations Act of 2021.	43.x: Thank you for your comment.
	43.y	We encourage ED to implement provisional independent student status for incarcerated students on time, on July 1, 2023, as Congress authorized in the Consolidated Appropriations Act of 2022. Aligning on-time implementation with implementation of Pell grants for Prison Education Programs would significantly ease the process of completing the FAFSA for the many individuals who are incarcerated and do not meet the independent student criteria.	43.y: Refer to response for comment number 11.ad .
	43.z	In order to exercise this authority, the instructions on page 10 of the incarcerated applicant form need to be updated to account for the possibility	43.z: Refer to response for comment number 11.ad .

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		<p>of provisional independent student status. If an electronic version of the Incarcerated Applicant Form were to be available, it would also need to be updated to remove language stating the impact of not providing parent information. All versions of the Incarcerated Applicant Form would also require an additional question for students to indicate their desire to complete the Incarcerated Applicant Form without parental information for the purpose of determining their Title IV student aid eligibility based on provisional independent student status.</p>	
	43.aa	<p>ED should also use authority granted in the Consolidated Appropriations Act of 2022 to implement on time (July 1, 2023) new language in the FAFSA Simplification Act that considers lack of parental contact due to student incarceration to be acceptable justification for a dependency override. ED should add a question on the Incarcerated Applicant Form asking whether the student, by nature of their incarceration, is unable to contact a parent or where contact with parents poses a risk to that student.</p>	<p>43.aa: Refer to response for comment number 11.ad.</p>
	43.ab	<p>ED should also issue guidance to financial aid administrators that an applicant's response of yes to this question could be considered adequate documentation for a dependency override. Dependency overrides are among the most complicated processes in the Title IV student aid application process, even for students who are able to maintain consistent contact with the financial aid office and who have access to necessary documentation. For incarcerated students whose contact with individuals outside of the carceral facility is strictly limited, finding out what documentation is needed and accessing that documentation will be nearly impossible.</p>	<p>43.ab: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>
	43.ac	<p>Beyond the application itself, ED must consider verification requirements for this population. Verification is already burdensome, especially for individuals from lower-income and minority backgrounds, who are also more likely to be Pell grant recipients. Since ED's verification selection algorithm targets Pell grant recipients and applicants who report no income, incarcerated students are likely to have very high verification selection rates. In fact, a 2019 report from the Government Accountability Office on the Second Chance Pell experiment found that verification selection rates for that student population were higher than the selection rates for non-incarcerated Pell grant recipients . Individuals who are incarcerated will face challenges even beyond what non-incarcerated individuals face with verification, given their lack of access to</p>	<p>43.ac: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>

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		<p>records and limitations on communication with outside individuals who could help with the process . Obtaining income verification or verification of nonfiling would pose a nearly insurmountable burden. This is further compounded for dependent students and married students, who must obtain tax information from parents and spouses as well.</p>	
	43.ad	<p>NASFAA has found that ED’s selection algorithm already casts too broad a net, selecting far more applications than appear necessary to capture FAFSA errors, such that 84% of selected applications examined from 45 institutions did not result in a change to Pell grant eligibility upon verification. The National College Attainment Network (NCAN) also conducted research that found over 70% of verification selected applications having no change to the Pell grant award amount upon verification, and 93% of applicants with an automatic Zero EFC seeing no change upon verification . Based on this data and given the high likelihood that this population will have no income due to their incarceration, we urge ED to deprioritize this population from verification selection.</p>	<p>43.ad: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>
	43.ae	<p>Student loan default is another area of great concern for individuals who are incarcerated. It is nearly inevitable that individuals who are incarcerated will go into default given their lack of income during incarceration and their lack of access to their servicers to arrange for repayment alternatives that would keep them from defaulting. While the recently-announced “fresh start” for delinquent and defaulted loans re-entering repayment after the covid-19 related pause is welcome news, new defaults among individuals who are incarcerated are just as likely to occur after this one-time action.</p>	<p>43.ae: Thank you for your comment.</p>
	43.af	<p>Understanding the requirement that applicants not be in default as a condition of receiving Title IV aid is statutory, we urge ED to do everything in its authority to keep student loan default from preventing individuals who are incarcerated from accessing postsecondary education. Options include working with correctional facilities to provide education about student loan default and repayment alternatives during incarceration and encouraging facilities to permit access to student loan servicer websites so borrowers who are incarcerated can take steps to ensure their loans are not in danger of default.</p>	<p>43.af: Thank you for your comment. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.</p>
	43.ag	<p>ED should also issue guidance to correctional facilities recommending access for aspiring students to certain websites and telephone numbers that exist specifically to assist applicants in completing the FAFSA. The Incarcerated Applicant Form lists sites such as childwelfare.gov and studentaid.gov and the</p>	<p>43.ag: Thank you for your comment. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.</p>

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		telephone number 1-800-4-FED-AID as resources for completing the application, but internet and telephone access are frequently limited for individuals who are incarcerated, leaving them without access to critical information they need to complete their application for a Pell grant.	
	43.ah	As ED develops the Incarcerated Applicant Form, it must also consider whether the Incarcerated Applicant Form could substitute for the standard FAFSA (and vice versa) in cases where a student may be enrolled in a Prison Education Program (PEP) for part of an award year and a non-PEP for another part of the same award year.	43.ah: No change. This is currently possible. If an applicant wants to send their FAFSA information to a non-PEP, they simply need to add the school code of the intended institution to their FAFSA form.
	43.ai	We appreciate the opportunity to comment on this proposed data collection.	43.ai: Thank you for your comment.
4 4	44.a	To whom it may concern, On behalf of Vera Institute of Justice, and the undersigned organizations, we respectfully submit to the U.S. Department of Education our comments on the 2023-2024 Free Application for Federal Student Aid (FAFSA) "Incarcerated Applicant Form" (1845-0001 2023-2024) which is part of the Federal Register's Docket ED-2022-SCC-0024.	44.a: Thank you for your comment.
	44.b	Vera currently provides technical assistance to the network of 130 colleges and corrections agencies in 42 states and DC participating in the U.S. Department of Education's Second Chance Pell Experimental Sites Initiative. Based on lessons learned through Second Chance Pell, Vera would like to address several concerns we have regarding the FAFSA "Incarcerated Applicant Form" (FAFSA IAF) in its current format and offer recommendations.	44.b: Thank you for your comment.
	44.c	Fafsa.org, StudentAid.gov, childwelfare.gov websites and the myStudentAid mobile app are referenced numerous times throughout the FAFSA IAF. Given the limited access people who are incarcerated have to the internet, we ask that potential students have access to the three websites when completing their FAFSA. Without that access, it is unlikely many of these students will be able to utilize the information these websites offer.	44.c: The Department of Education is researching all available options and has referred this suggestion to the appropriate Department to review recommendations.
	44.d	1-800-FED-AID (1-800-433-3243) is referenced numerous times throughout the FAFSA IAF. Given the limited access people who are incarcerated have to 1-800 numbers, we ask that potential students have access to 1-800-FED-AID (1-800-433-3243) or alternate local (non-1800) numbers to complete the FAFSA. Without that access, it is unlikely many of these students will be able to utilize that method of communication and receive assistance.	44.d: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.

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	44.e	An applicant's parents and/or spouse are referenced numerous times in the FAFSA IAF. Potential students completing the FAFSA IAF often have little or no communication with their parents and/or spouse. Given that incarceration status is now considered an "unusual circumstance" permissible for dependency overrides, we ask that all sections related to parents and/or spouse are removed.	44.e: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.f	In the deadline section on page 1 of the FAFSA IAF, we ask that the following note be added: "In some cases, state aid is not available to students who are incarcerated."	44.f: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.g	On page 1 of the FAFSA IAF, black ink is the only option given for completing the form. Given that some correctional facilities do not allow black ink, we ask that other ink colors and/or writing utensils, such as pencils, are added as permissible options.	44.g: This change will be made.
	44.h	On page 1 of the FAFSA IAF under mailing instructions, the Department recommends applicants make a copy of pages 3 through 8. Given that people who are incarcerated are unlikely to have access to copy machines, we ask that this language be removed or accessible alternatives be offered.	44.h: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.i	On page 2 of the FAFSA IAF, it states that "more information on student financial aid" can be found in "your local library's reference section." There are many correctional libraries throughout the U.S. that do not have that information available to students. We ask that if this language remains, the Department ensures that every correctional library and every educational program in the country has that information available before Pell is reinstated and continues to send updates regarding the FAFSA to those locations.	44.i: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.j	On page 3 of the FAFSA IAF, question 11 asks applicants to provide their driver's license number. Given that no person who is incarcerated is allowed to have their driver's license with them, this request for information does not seem relevant and would most likely be impossible for students to complete. We ask that this question be removed.	44.j: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.k	On page 5 of the FAFSA IAF, question 45 asks applicants if they "are currently serving on active duty." Given that no person who is incarcerated can respond "yes" to this question, the question does not seem relevant. We ask that this question be removed.	44.k: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.l	On page 8 of the FAFSA IAF, question 90 asks applicants "how many people are in your household." Given that no person who is incarcerated resides in or can	44.l: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to

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		provide information regarding their current “household,” this question does not seem relevant. We ask that this question be removed.	review recommendations.
	44.m	On page 8 of the FAFSA IAF, questions 98.B, 98.D, 98.F, and 98.H ask about an individual’s “housing plans.” Given that the applicant is incarcerated, these questions do not seem relevant. We ask that all references to “housing plans” are removed.	44.m: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.n	On page 8 of the FAFSA IAF, students are told that by signing the form, they certify they are not in default on a federal student loan. As we know from the Second Chance Pell Experiment, many students are in default on their student loans but do not know this until they complete a FAFSA. Furthermore, many colleges advise students to complete the FAFSA first and work on resolving student loan defaults after, so the process of receiving Pell once loans are rehabilitated is expedited. We ask that this language is removed or additional guidance is offered. In any case, this form should include guidance for students who think or know they have loans in default and, at the very least, advise them on how to resolve the loan default (e.g., whom to communicate with about the matter).	44.n: No Change. The Department of Education believes the suggested change would affect the legal substance of the certification statement.
	44.o	On page 8 of the FAFSA IAF, under question 100, there is a space where a parent can sign. This seems inappropriate given the applicant resides in a carceral setting and is likely unable to acquire a parent's signature. We ask that this space be removed.	44.o: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	44.p	On page 8 of the FAFSA IAF, under the preparer’s section, the following words appear, “If a fee was paid to someone for advice or for completing this form, that person must complete this section.” Given the applicant is incarcerated, no fee should be required for or paid to someone offering advice or completing this form (e.g., a college counselor). We ask that the preparer's section, or at least the reference “If a fee was paid to someone for advice or for completing this form, that person must complete this section” be removed.	44.p: No change. An applicant can skip the preparer section if a preparer was not paid for advice or for completing the form.
	44.q	The FAFSA IAF is an important document that will hopefully streamline the application process for people wishing to start or continue their educational journey. We look forward to working with the Department further to expand access to high quality postsecondary education for people in prison. Doing so will improve public and facility safety, inspire educational and economic opportunity, and increase racial equity. Thank you for your consideration.	44.q: Thank you for your comment.
4	47.a	To whom it may concern,	47.a: Thank you for your comment.

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7		<p>On behalf of Hudson Link for Higher Education in Prison, Inc we respectfully submit to the U.S. Department of Education our comments on the 2023-2024 Free Application for Federal Student Aid (FAFSA) "Incarcerated Applicant Form" (1845-0001 2023-2024) which is part of the Federal Register's Docket ED-2022-SCC-0024.</p> <p>Hudson Link for Higher Education in Prison provides college education, life skills, and reentry support to currently and formerly incarcerated people so they can make a positive impact on their own lives, their families, and communities, resulting in lower rates of recidivism, incarceration, and poverty. Our holistic program structure follows each student through pre-college, associate and bachelor's degree, and reentry services. During our nearly 25-year history, we've awarded over 800 degrees and currently provide college programming to over 300 students in six correctional facilities in New York State, several of which are Second Chance Pell sites.</p> <p>Based on our extensive experience supporting incarcerated students through their post-secondary degrees, we would like to offer the following recommendations on the FAFSA "Incarcerated Applicant Form" (FAFSA IAF):</p>	
	47.b	<p>1.) Remove Areas for Parental, Spousal, and Household Financial Information</p> <p>Due to many factors, ranging from familial estrangement, physical separation, and mail regulations, it is a challenge for incarcerated students to access parental, spousal, and household financial information. Considering that incarcerated students are eligible for "unusual circumstances" and therefore dependency overrides, the burden of familial requirements is an unnecessary barrier to completing the FAFSA IAF application.</p> <p>We, therefore, respectfully request removing Step Three, Four, and Five from the form and making significant alterations to Step 2 in all areas where spousal information is asked for.</p>	47.b: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	47.c	<p>2.) More Guidance Around Social Security Numbers</p> <p>One of the biggest barriers we find students face when completing their FAFSA</p>	47.c: No Change. To be eligible for federal student aid, an applicant must have and provide a valid Social Security number on the FAFSA form (with the exception of students from the Republic of the

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		<p>application is knowing their social security number. Many prospective students have never used nor have had access to their social security numbers for decades. Without family members who've held onto this information, it can feel impossible to obtain their social security numbers.</p> <p>It would be worthwhile to explore alternatives to social security numbers for filing a FASFA IAF. If that is not possible, at the very least, offering more guidance on how to obtain this critical piece of information while incarcerated could go a long way to expand access to college for incarcerated students.</p>	<p>Marshall Islands, Federated States of Micronesia, or the Republic of Palau). (See 34 CFR 668.32(ii))</p>
47.d		<p>3.) Update Subsection "When will I receive the student financial aid?"</p> <p>On page 2: Under the subsection "When will I receive the student financial aid?" when the form states "that any remaining aid is paid to you for your other education expenses," it does not apply to incarcerated students and therefore needs language revision.</p>	<p>47.d: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>
47.e		<p>4.) Eliminate the label "Incarcerated Application Form"</p> <p>The Draft FASFA form is labeled on each page with the heading "Incarcerated Application Form." This label brings a stigma to the students utilizing the form, and we suggest differentiating the IAF form another way, such as by assigning a reference number.</p>	<p>47.e: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>
47.f		<p>5.) Revise the Requirement for the High School Name</p> <p>In Step 1, question 24, it is required for applicants to provide their complete high school name, high school city, and state. Many students obtain their high school credentials through GED or HSE exams during their incarcerations, some decades before filling out their FASFA forms or even in different states than their current incarceration, making obtaining the complete information challenging.</p>	<p>47.f: No change. The instructions for question 23 indicate that an applicant should skip question 24 if their response is anything other than high school diploma.</p>
47.g		<p>6.) Remove additional areas not relevant to incarcerated students, including:</p> <p>Step 1, questions 11 & 12 asking for driver's license & state</p> <p>Step 1, question 13 asking for an email address</p>	<p>47.g: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>

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		Step 6, question 98b-98h asking for housing plans	
		Step 7, questions 100-2 asking for parental signature	
	47.h	<p>7.) Remove the language that by signing the form, students are certifying that they are not in default on a federal student loan</p> <p>Many students do not know they are in default on student loans until they have completed their FASFA. Further, according to the Vera Institute of Justice's comments on this topic, "many colleges advise students to complete the FAFSA first and work on resolving student loan defaults after, so receiving Pell once loans are rehabilitated is expedited." Therefore, we request that the language certifying they are not in default be removed as a precursor to signing the FASFA form.</p>	47.h: No change. The Department of Education has reviewed this language with the appropriate business units and this language has been crafted based on legal requirements.
	47.i	<p>8.) Consider a change in font size and format</p> <p>The average age of incarcerated students is older than their on-campus counterparts, and the form in its current format is difficult to read due to its small font and dense spacing. Above, we listed several areas of the FASFA IAF which could be removed, thereby making a more efficient form containing fewer questions. We suggest that in this more efficient format the font sizes be larger with greater spacing between questions.</p>	47.i: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	47.j	We thank you for your time and commitment to expanding access by updating this vital FASFA IAF form.	47.j: Thank you for your comment.
48	48.a	<p>Dear Coordinator Mullen,</p> <p>On behalf of The Education Trust, the inaugural cohort of The Education Trust's Justice Fellows Policy Program, and the undersigned organizations, thank you for the opportunity to respond to the request by the U.S. Department of Education ("the Department") for comments regarding the 2023-2024 Free Application for Federal Student Aid (FAFSA).</p>	48.a: Thank you for your comment.
	48.b	In December 2020, Congress lifted a 26-year-old ban on Pell Grants for people in prison. The restoration of access to Pell Grants means that incarcerated people can once again apply for federal Pell Grants via FAFSA completion to pay for college courses.	48.b: Thank you for your comment.
	48.c	Students who are incarcerated face additional barriers navigating the pathway	48.c: Thank you for your comment.

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		<p>of a postsecondary education. Access to federal financial aid can make a difference for low-income and first-generation incarcerated students. However, these students are the most likely to miss out on this aid because of the many barriers and complexities inherent in the admissions process. In particular, Black people are discriminated against after disclosing their involvement with the criminal legal system at higher rates than all other races. These discriminatory practices prompted higher education in prison program advocates to launch ban-the-box initiatives.</p>	
	48.d	<p>More broadly, “tough on crime” initiatives have historically placed higher education out of reach for incarcerated individuals. They are expected to navigate a minefield of legal exclusions in prison and after release. These policies send a clear message that an individual’s past actions are determinative of their future opportunities and abilities.</p>	48.d: Thank you for your comment.
	48.e	<p>We appreciate the Department’s recognition that the FAFSA process needs to be simplified for incarcerated students. However, it appears that the current FAFSA and the proposed “Incarcerated Applicant Form” ask for the same information. The utility of a separate form is its ability to be amended to ease the application process. Furthermore, labelling the form the “Incarcerated Applicant Form” invites skepticism from incarcerated students who are used to their convictions excluding them from opportunities. A separate form is reminiscent of Jim Crow era presumptions of segregation and inherent inferiority. “Blacks Only” and “Whites Only” signage spoke to a separate but unequal reality for Black people. Dismantling such messages is necessary to dismantle the policies that birth them.</p>	48.e: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	48.f	<p>Additionally, the proposed separate form invites comparison to the exclusionary practices that result from criminal background checks. We have long had a mass incarceration problem marked by vast racial and gender disparities. Black men ages 18 to 19 are 12 times more likely to be imprisoned than White men of the same age, and Black women are imprisoned at twice the rate of White women. The “Incarcerated Applicant Form” falls short of being a criminal background check, but still threatens to stigmatize incarcerated students and dissuade them from completing the FAFSA. Without proper implementation and protection, the existence of this form post-release could allow institutions to circumvent ban-the-box policies. We recommend that the Department decline to create a separate “Incarcerated Applicant</p>	48.f: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.

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		Form.”	
	48.g	<p>However, if the Department of Education decides to employ an “Incarcerated Applicant Form,” we make the following recommendations:</p> <p>1. Implement the VERA Institute of Justice’s recommended edits and updates to the FAFSA, with special attention to the following which will especially impact the application experience for students who are incarcerated:</p> <ul style="list-style-type: none"> • On page 3 of the FAFSA IAF, question 11 asks applicants to provide their driver’s license number. Given that no person who is incarcerated is allowed to have their driver’s license with them, this request for information does not seem relevant and would most likely be impossible for students to complete. We ask that this question be removed. • On page 8 of the FAFSA IAF, under question 100 there is a space where a parent can sign. This seems inappropriate given the applicant’s carceral setting and is likely unable to acquire a parent’s signature. We ask that this space be removed. 	48.g: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	48.h	Step Three and Four on the FAFSA IAF should be removed completely.	48.h: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	48.i	On page 3 of the FAFSA IAF, for question 4 the Department should consider including instructions to include state or federal ID numbers on the address line.	48.i: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	48.j	Removing the title “Incarcerated Applicant Form” to prevent any skepticism and stigma that would dissuade applicants from completing the FAFSA.	48.j: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	48.k	To distinguish the form, explore the use of a reference number or specific color for the paper form.	48.k: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	48.l	We are happy to respond to any questions you may have regarding the contents of this letter. Thank you for your consideration.	48.l: Thank you for your comment.
49	49.a	We are delighted that Congress recently adopted the FAFSA Simplification Technical Corrections Act within the Consolidated Appropriations Act, 2022 (Public Law No: 117-103), thereby allowing many long-overdue enhancements	49.a: Thank you for your comment.

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		<p>to federal financial aid to be implemented with greater clarity and certainty. These enhancements include some reforms that should go into effect on the timeline Congress intended with the FAFSA Simplification Act. The Hope Center, therefore, urges the U.S. Department of Education (“Department”) to fully implement all the policies described in Section 102(c)(1)(A) of the FAFSA Simplification Technical Corrections Act for the 2023-24 award year. We are concerned that, in several places, the draft 2023-24 FAFSA may indicate that the Department is not planning to utilize the statutory authority afforded by Congress fully and could be considering delaying much-needed reforms to the financial aid process.</p>	
	49.b	<p>If the Department is not able to make immediate adjustments to the questions or format of the paper FAFSA for the 2023-24 cycle, we encourage the Department to proceed with adjustments to FAFSA On the Web (FOTW) or utilize help text and prompts to accomplish similar goals until full changes can be made. A similar update was made to the FOTW late in the comment process in 2016.1 Below are comments on specific subject areas important to helping students obtain and maintain access to federal financial aid resources.</p>	49.b: Refer to response for comment number 11.ad .
	49.c	<p>1. Students unable to provide parental information. The FAFSA Simplification Act significantly expands the options for students unable to provide parental information, and the Department should implement them swiftly. The Department should update any of the text appearing on page 10 of the paper PDF, under “Notes for students unable to provide parental information on pages 6 and 7” and associated help text on FOTW, for example, that such circumstances are no longer “very limited” and a student does not need to follow up with a financial aid administrator to complete the FAFSA. In particular, the Department should pay special attention to the circumstances in which the student is (A) not able to contact their parent, regardless of whether they know where the parent lives, (B) is estranged from their parent, or (C) has been abandoned by their parent—all of which are now reasons that applicants can decline to provide parental information per the FAFSA Simplification Act. The Department must adopt a trauma-informed approach to its interpretation and description of these words to avoid situations in which an applicant is forced back into potential harm or abuse. For example, many LGBTQ+ applicants often experience parental estrangement or abandonment after the coming out process. These students are more likely to miss out on federal</p>	49.c: Refer to response for comment number 11.ad .

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		financial aid or potentially give up on higher education entirely—compounding the traumatic effects of discrimination—but new flexibility provides hope to students who are unable to provide parental information.	
	49.d	If a student applicant skips any of the parental information, FOTW should provide contextualized information to the student about their ability to proceed without the parental information and avoid sending confusing error messages suggesting a student should complete these sections. The Department should allow all students who find themselves unable to provide parental information broad latitude to complete the FAFSA and should always strive to give students the benefit of the doubt about their circumstances. For example, a student’s request for a determination should be honored unless the (A) student informs the institution that circumstances have changed or (B) the institution has specific conflicting information about the student’s independence and has informed the student of this information – just like the process for students obtaining a determination of independence if experiencing homelessness or at risk of homelessness.	49.d: Refer to response for comment number 11.ad .
	49.e	2. Students experiencing homelessness or at risk of homelessness and former foster youth (questions 52-54). The Hope Center has provided comments on this issue under separate cover in an April 25, 2022 letter co-signed by SchoolHouse Connection, Education Law Center, John Burton Advocates for Youth, The Institute for College Access & Success (TICAS), and Youth Law Center. In general, we are concerned that the Department is not using its authority to changes in the FAFSA Simplification Act for the 2023-24 award year, including expanded sources of determination, automatic renewal of previous determinations, and protections for students against having the reasons for their homelessness questioned. We urge the Department to review both the questions and the associated help text to ensure all recent legislative reforms are implemented expediently.	49.e: Refer to response for comment number 11.ad .
	49.f	3. Housing plans for institutions receiving FAFSA data (question 98). After applicants provide institution names or school codes to receive their FAFSA information, they are provided with only three options to select a housing plan for each institution: <ul style="list-style-type: none"> • “On Campus” if you intend to have on-campus housing • “With Parent” if you intend to live with your parent(s) • “Off Campus” if you intend to live off campus, but not with your parent(s) 	49.f: 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 Free Application for Federal Student Aid (FAFSA®).

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		<p>Unfortunately, many students do not know what their living situation will be once they move to campus or begin coursework and may not have a safe, affordable, and consistent housing “plan” at the time of filling out the FAFSA. Many current students also experience this lack of stability. Research from the Hope Center from a survey of 195,000 students conducted in the fall of 2020 finds that nearly half (48 percent) of all students are experiencing housing insecurity, and 14 percent are experiencing homelessness.²</p> <p>The current three-part answer does not reflect the lived experiences of many students, particularly for students experiencing homelessness or at risk of homelessness or former foster youth. Students’ plans frequently change from when they fill out the FAFSA until they enroll at an institution of higher education. Additionally, if a student selects “off-campus” or “with parent,” a financial aid administrator may not know to follow up with such applicant to confirm they have secured stable housing or to offer on-campus resources, due to the mistaken belief that a student’s off-campus housing plan was safe, affordable, and consistent.</p> <p>Additionally, the current structure may force dependent applicants to have a conversation with family about where they are to live when their focus should remain on completing the financial aid process. This may be a difficult conversation full of uncertainty or even dread for some students. Instead of presenting only three options, the Department should add an option for students to answer “Don’t know, but I would like more information about housing options from my school.” This would provide a safe, friendly, and simple option for students to indicate that they are not sure about their housing plan, which will provide information to financial aid administrators that can follow up with additional information and resources.</p>	
49.g		<p>4. Professional judgment. The FAFSA Simplification Act expands the authority of financial aid administrators to use “professional judgment” (PJ) to provide students with additional financial aid, through modifications to the cost of attendance, the values used to calculate the Expected Family Contribution, and values used to calculate a Pell Grant award. The PJ process helps to ensure that students with special or unusual circumstances can gain access to the full amount of Federal, state, or institutional financial aid they need to be</p>	49.g: Refer to response for comment number 11.ad .

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		<p>successful and helps to reduce students' basic needs insecurity. The law also stipulates that no institution of higher education or financial aid administrator shall maintain a policy of denying all requests for adjustments under this section—but some institutions do not currently grant any PJ requests to students. The Department should provide information to all students during the FAFSA application process, and at the conclusion of the FAFSA (i.e. through the Student Aid Report), that informs students about their rights and options for PJ and where they can go to obtain more information.</p>	
49.h		<p>5. Interest in work-study (question 28). State and federal work-study programs can be used to benefit any qualifying student and should support their financial needs regardless of their upfront knowledge of or interest in the program. Even students who select “no” to this question may later need financial support or could have incorrect knowledge about the program. It is the responsibility of each institution participating in the Federal Work-Study program to use their funds to assist students with financial need and provide the appropriate information during the financial aid packaging process. Since this question adds confusion for applicants, is not required by law, and serves no purpose in the administration of the federal financial aid programs, it should be eliminated. Additionally, removing all unnecessary questions is consistent with the intent of the FAFSA Simplification Act.</p>	<p>49.h: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>
49.i		<p>6. Date parents were married, widowed, separated, or divorced (question 56). This information is not required by federal law, adds confusion for students, and should be eliminated. It is not clear how the information is used to the benefit of the applicant. Applicants presented this question may need to step away from the FAFSA process to obtain legal documentation like a marriage certificate, divorce document, or death certificate, and each time an applicant disconnects from the process, they are less likely to complete the FAFSA. Consistent with the intent of the FAFSA Simplification Act, the Department should remove unnecessary questions. At a minimum, the Department should provide a “don’t know” response option to this question.</p>	<p>49.i: The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.</p>
49.j		<p>7. Military and veteran status (questions 45 & 46). In accordance with the FAFSA Simplification Act, all applicants should be asked whether they are on active duty or are a veteran of the armed forces – regardless of whether the applicant has already been identified as independent. This information is critical to developing demographic outcome information in student aid</p>	<p>49.j: Refer to response for comment number 11.ad.</p>

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		<p>programs, veterans and service members to other available sources of financial aid, and protecting veterans and service members from fraud and abuse. The FAFSA Simplification Act requires that these questions be asked of all applicants starting in award 2024-25, but the Department should move to implement the change now.</p>	
	49.k	<p>We appreciate the opportunity to provide these comments regarding the 2023-24 FAFSA and the changes which can further streamline the federal financial aid process. We look forward to working with you to implement the FAFSA Simplification Act and other enhancements to make it easier for students to obtain the resources they need to pursue higher education.</p>	49.k: Thank you for your comment.