

#	ID#	Comments	Formal Response
0004	1	Please add back housing question to the application. Schools uses this question to budget the students correctly. Eliminating this question is going to create a huge burden to schools.	1) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
0005	2	I am not sure how DoE is justifying that this is making the process easier/more simplified. The new FAFSA is going to require ALL parties to have and use their FSA ID in order to sign and submit. That means for many students, they will need to have their own ID and both parents have an FSA ID. To my knowledge, there are no current plans in improving the lengthy and challenging process to secure an FSA ID. Nor are there plans in bettering the process of recovering an FSA ID as they are tied to SSN. Furthermore, to bypass the need for all users to have an FSA ID, the only suggested option is to complete a paper FAFSA. Current estimates for existing FAFSAs (that have remained relatively consistent, implying that those that process applications are reasonably proficient whereas new FAFSAs will lack that proficiency just due to the significant changes) are weeks to even months for processing times. I think its reasonable to assume that there will be an increase in paper FAFSAs and that processing times will be significantly longer, which is not at all benefitting the student.	2) Thank you for your comment. The Department of Education implemented this change in accordance with the security and identity validation requirements of the FUTURE Act.
0006	3	In reviewing the draft 2024-2025 FAFSA, I find it interesting there are questions remaining on the FAFSA that do not pertain to the SAI calculation. The questions to which I am referring are #10 Number in College, and #16 Parental College Experience. Granted #16 will assist in determining first generation students. Yet question #10 could be discovered if requested by the parent as part of a professional judgement, as this data will not be taken into account when calculating the SAI. However, institutions are required to have a separate budget for students who are living off-campus living with parents, and there is no housing question remaining. Granted a housing question has no bearing on the SAI; however, will benefit the institution greatly in order to determine a more accurate cost of attendance for each student. The FAFSA Simplification Act not only touches upon fewer questions on the FAFSA, but also a more accurate and clear COA for students as well. I humbly request a housing question be added back to the FAFSA, or this will force institutions to have the student jump through more hoops by completing additional documentation in order to create a more student-centered COA.	3) Refer to response for comment number <u>1</u> .
0007	4.a	It would be highly beneficial for Higher Ed institutions to have the housing question added back to the FAFSA form. I am unsure how DoE argues that including that question is outside the realms of necessary information but the questions regarding race and ethnicity are necessary.	4.a) Refer to response for comment number <u>1</u> .
0007	4.b	I also struggle with the 'simplified' aspect as both parents and a spouse (if applicable) will now be required to obtain FSA IDs and that is a lengthy process in and of itself. The FSA ID creation process alone takes about 25 mins to complete for one individual and this will now be multiplied by additional people	4.b) Refer to response for comment number <u>2</u> .

		having to create one. I could see several students electing to do the FAFSA process via paper, which will create longer timing delays.	
0008	5	I think the language needs to be revised for section 7 "Unusual Circumstances," specifically bullet points #2 and #6. It is not uncommon for students who have been adopted to have unusual circumstances with their adoptive parents. In the 25 + years I have been working in Financial Aid, I have seen more students file an appeal for a Dependency Override who have unusual circumstances their their adoptive parents than students who misunderstood the question and had unusual circumstances with their biological parents and were later adopted. I think the language on the draft proposal would lead students to believe that if they are adopted they do not qualify for unusual circumstances. I would remove this language from the application. Also, as someone who is a member of the adoptee community, I can say that when when most adoptees see the word "parent", they think of their adoptive and not bio parent. Thank you for taking this comment into consideration.	5) This change will be made as requested.
0009	6	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from admitted students will be incredible when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	6) Refer to response for comment number <u>1</u> .
0010	7	Question 35, number of family members in college, seems to exclude only one parent from the number in college. I would think the "other parent" should also be excluded. I suggest "Do not include the parent" be rephrased to "Do not include either parent," "Do not include parents," etc.	7) This change will be made as requested.
0011	8	I recommend removing the emancipation question entirely. The majority of emancipated students I have seen seem to have been emancipated shortly before their eighteenth birthday, for no apparent reason (based on reported special circumstances and review of their admissions applications). Rather, it seems they have well-connected, well-informed parents who have their child emancipated for financial aid purposes, in order to receive federal and state grant aid for which they would not otherwise qualify. I work at a school that does institutional verification for our own need-based grant funds. We routinely get the parent information for emancipated students, including CSS PROFILE and complete tax returns, without any difficulty. These families rarely turn out to have high enough need that they would qualify for federal grant aid, or the significant state aid offered in California, if the student had not been hastily emancipated.	8) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(XVI)(bb).

		<p>These students generally do not report significant income or assets, indicating they are in no way actually independent of their parents. We require the emancipation documentation, and these court documents rarely give any explanation for why the student was emancipated. I recall only one case in which the judge gave an explanation, and they described the student as self-employed; this student did have schedule C income in the base year, but it was minimal (well below our guidelines for considering a student self-supporting), from something like mowing the neighbors' lawns during the summer. The student lived with the parents, etc., otherwise appearing to be a dependent student in every way.</p> <p>In cases where a student has been emancipated with good reason, I would consider the emancipation document to help support a dependency override, along with review of the admission application, a supporting letter from a high-school counselor, etc, making dependency override a better solution for such cases.</p> <p>As it stands now, the emancipation questions seem to me prone to abuse, especially for wealthy and well-connected families well-informed enough to game the system in this way.</p>	
0012	9	<p>Please add housing options so that financial aid offices are not compelled to gather this information directly from students before packaging their federal aid, creating another barrier to entry. A student's housing status has a significant impact on cost of attendance, need analysis, and therefore packaging. Please include options for living on a military base or housing for which they receive a military housing allowance. Thank you.</p>	9) Refer to response for comment number <u>1</u> .
0013	10	<p>It seems as though the only reduction in the form was the information FAAs need, like the housing selection. This needs to be included to produce the correct CoA for the academic year.</p>	10) Refer to response for comment number <u>1</u> .
0014	11	<p>Question 7 will pose a significant burden to FAAs to verify the student's current standing.</p>	11) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(ii)(XVI) (ii).
0015	12	<p>I'm writing to support the request made in the attached March 16, 2023 letter from NASFAA regarding the removal of the Housing question on the 2024-25 FAFSA. As stated in the letter, this appears against the intent of FAFSA simplification, as it is necessary for institutions to have this information in order to develop the Cost of Attendance associated with awarding Title IV aid. This is not optional for schools....the information must be secured to award Title IV aid. Without this field, schools will have to put students through additional steps to collect this information (burden on students and schools), and attempt to develop a Cost of Attendance without a field in our software where this information resides (from the ISIR). This can all be solved to putting this question back on the FAFSA, which will serve students better in the end and keep with the overall intent of FAFSA simplification. Thank you for your consideration.</p>	12) Refer to response for comment number <u>1</u> .

0016	13.a	For Questions 20, 28, 38, 45 for clarity purpose Income earned from work add the alpha letter from 1040 Line 1 ...z is add lines a through h or are we to use a through c?	13.a) Thank you for your comment. 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 2024-25 FAFSA form. The updated draft FAFSA form will reflect the final 2024-25 tax line references and instructions.
	13.b	Income tax paid shows using 1040 line 25d which on the 2022 tax form is payments. Should this be line 22? for taxes owed?	13.b) Refer to response for comment number 13.a .
0017	14	Please add the question on Student housing back to the 2024-25 FAFSA. Schools are required to create a Cost of Attendance(COA) that reflects whether the student will be On-Campus, Off-Campus or with a parent. We have a relatively low COA for students who live with a parent and are in district, but a high COA for students who live Off-Campus not with a parent (due to high cost of living in the area) therefore the housing that the student selects will drastically change their COA (between 10K-15K difference). If we are not able to gather this information from the FAFSA and have to gather it in a different way, that will cause delays in getting students award offers. We would not package a student until we know this information since the COA change would be so drastic that there would be many potential over awards. Please add the housing question back so that we do not have to delay award offers and create additional barriers to our students.	14) Refer to response for comment number 1 .
0018	15.a	Questions 20, 38, 45 Why is IRS 1040NR only mentioned for income earned from work, when the line items apply to both 1040 and 1040NR?	15.a) Refer to response for comment number 13.a .
	15.b	Income earned from work: Current: IRS Form 1040 -line 1 (or IRS Form 1040-NR -line 1a) + Schedule 1 -lines 3 + 6 Should be: IRS Form 1040 -line 1a (or IRS Form 1040-NR -line 1a) + Schedule 1 -lines 3 + 6	15.b) Refer to response for comment number 13.a .
	15.c	IRA rollover into a qualified plan Pension rollover into a qualified plan Families do not receive Form 5498, so they have no way to refer to it. Tax filers do receive and should be referred to reference Form 1099-R.	15.c) Refer to response for comment number 13.a .
	15.d	Income tax paid: Current: IRS Form 1040: line 25d (this is total tax withheld) Should be: IRS Form 1040: line 22 (this is the actual tax due)	15.d) Refer to response for comment number 13.a .
	15.e	Did the student/parent receive the earned income tax credit (EITC?) Current: IRS Form 1040: line 27a	15.e) Refer to response for comment number 13.a .

		Should be: IRS Form 1040: line 27 (there is no line 27a)	
0019	16	How will the parent that provides the most support be determined if only one parent (divorced) fills out the FAFSA? Will that parent have to claim the student as their dependent on their taxes? What about divorce / support agreements that alternate parents claiming the dependents every other year?	16) Thank you for your comment. The parent who provided the most financial support over the past 12 months (at the time of FAFSA completion) is required to submit parent information for dependent students. If both parents provided an exact equal amount of financial support, or if neither parent supports the student financially, provide information for the parent with greater income or assets.
0020	17	For a student's email address under question 2, I suggest encouraging 12th graders not to use their school email address. The email address can be used for many reasons, such as notification of submission, by state grant agencies reminding a student to apply for state aid, and in the next year to complete a Renewal FAFSA. Since high schools commonly delete these email addresses when a student graduates the student will never receive these notifications. It would be better for a student to use an email address they will always be able to access.	17) Thank you for your comment. 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®) form.
0021	18	Please add back the housing question to the simplified FAFSA form. Schools do not have a good way to determine whether a student intends to live on-campus, off-campus, or with parent/relative without it. Thank you for considering!	18) Refer to response for comment number <u>1</u> .
0022	19	Please add back the housing question. This is vital especially with the increased regulations for Cost of Attendance. Schools use this question to ensure that students are budgeted correctly, and removing this question at a time when COA is more regulated is putting an even larger burden on schools and FAAs.	19) Refer to response for comment number <u>1</u> .
0023	20	If the housing question is removed, then please remove this regulation in the development of the Cost of Attendance. Otherwise, please add this question back to the FAFSA. I anticipate if this is left to the schools to collect, it won't happen because of the administrative burden it creates. Also, if schools don't collect this information, indebtedness could increase for students who live at home with parent would normally receive a lower COA. Instead, these students would be assigned and on or off-campus COA, which is most likely 20-40% higher than living at home with parents.	20) Refer to response for comment number <u>1</u> .
0024	21	I have several comments on the new FAFSA. First, why is the housing question being removed? Many schools have requested this not be removed from the FAFSA and yet, it seems that the Education Department is intent on not having it. Why not?	21) Refer to response for comment number <u>1</u> .

		<p>What was the point of the name change? Many students and their parents have known it to be called FAFSA so what is the point of changing it?</p> <p>It seems that a lot of these changes are without merit and that we, the education community, are not being heard.</p>	<p>21.b) Thank you for your comment. The Department of Education is not changing the name of the Free Application for Federal Student Aid (FAFSA) form.</p>
0025	22.a	<p>I have several comments on the new FAFSA.</p> <p>First, why is the housing question being removed? Many schools have requested this not be removed from the FAFSA and yet, it seems that the Education Department is intent on not having it. Why not?</p>	<p>22.a) Refer to response for comment number <u>1</u>.</p>
	22.b	<p>What was the point of the name change? Many students and their parents have known it to be called FAFSA so what is the point of changing it?</p> <p>It seems that a lot of these changes are without merit and that we, the education community, are not being heard.</p>	<p>22.b) Refer to response for comment number <u>21.b</u>.</p>
0026	23	<p>For students working on a second bachelor's degree or preparatory coursework for grad school the options in Question 4 are unclear. They could select "other undergraduate" or "college graduate, professional, or beyond". The question is "What will their college grade level be?" The answer "college graduate" makes no sense. College graduate is anyone with a degree, including associates degrees. On prior FAFSAs "1st year college/graduate: and "continuing college/graduate" give context that is not provided by simply stating "college graduate/professional". It is similar to the issue from earlier FAFSA versions where high school graduates mark that they are grad students because they have graduated from high school. Why not state something like Master's, Doctoral or professional. That's how we refer to them. Grad student is the colloquial term that encompasses those three. Or graduate/professional level and use different degree codes M.A., Ph. D. MBA, MD).</p>	<p>23) This change will be made.</p>
0027	24	<p>In order to provide students with a more accurate COA, having a housing question on the FAFSA is still beneficial for many schools and humbly requested to be returned to the application.</p>	<p>24) Refer to response for comment number <u>1</u>.</p>
0028	25.a	<p>I echo what others and NASFAA have requested, for the housing status question to remain on the FAFSA. It would be quite the burden to establish another way to determine housing status and therefore the student's COA without this question.</p>	<p>25.a) Refer to response for comment number <u>1</u>.</p>
	25.b	<p>Also, for 2023-2024 and forward the State of Michigan has moved their priority deadline from March 1st to May 1st.</p>	<p>25.b) Thank you for your comment. The Department of Education is continuously working with states to finalize their respective deadlines. Accurate state deadline information will be provided before the final draft of the FAFSA is released.</p>

0029	26.a	The 2024-2025 FAFSA is a result of the FAFSA Simplification Act, but this title is a misnomer. The FAFSA seems longer and more complicated than in the past. Now requiring each person to have an FSA ID and submit information is burdensome. In the past, student spouses and both parents were not required to participate in FAFSA completion, yet now they are in some cases.	26.a) Refer to response for comment number <u>2</u> .
	26. b	The lack of simplification is even more apparent when viewed from the perspective of institutions. Removing the ability for independent students to provide parental information is a serious issue for schools which use that information to determine institutional funds or award funds through HHS, such as the Health Professions Student Loan, Loan for Disadvantaged Students, or Scholarship for Disadvantaged Students. Those schools rely on that information, and without it, schools will be forced to have students complete additional forms and paperwork and put the burden on the institution to calculate any parental contribution figures. This is hardly simplification.	26.b) Thank you for your comment. The Department of Education recognizes that some programs require parent information for independent students; however, the FAFSA Simplification Act no longer grants the authority to collect parental information for independent students.
	26.c	Additionally, the FAFSA noted that those who do not give consent for FTI will not have an SAI calculated. This puts the burden on the institution to calculate the SAI.	26.c) Thank you for your comment. The FUTURE Act requires consent and approval for the Department to calculate an official SAI.
	26.d	The removal of the question about housing plans creates issues for institutions which use that information to determine student budgets. For an institution to now obtain this information, additional forms from the students will be needed, again, contradicting the goal of simplification.	26.d) Refer to response for comment number <u>1</u> .
0030	27	Please do not remove the questions on the FAFSA relating to the student's housing status. Our school uses this information for many reasons; but most importantly, to determine the correct Cost of Attendance for each student and to award certain scholarships based solely on housing status.	27) Refer to response for comment number <u>1</u> .
0031	28	I respectfully ask that ED reconsider the requirement of an Independent Student having to obtain a spouse signature and consent. Independent students' educational choices and the ability to utilize federal student aid should not be dependent on their spouse's consent. Unfortunately, for victims of domestic abuse, this will serve to create a roadblock for the student, putting them in a situation where they are then unable to continue with their education due to their domestic circumstance when their partner chooses not to comply or where they are potentially put in a situation in which they are tempted to commit fraud in order to complete the FAFSA. If ED is going to continue to have this as a requirement, they should allow for an option for the student to select which states "My spouse refuses to complete this section. Therefore, I have provided the information which I consider to be true and accurate."	28) Thank you for your comment. Spouse signature, consent, and approval are only required if the student (or parent if applicable) is married and did not file a joint tax return with their current spouse.
0032	29	My understanding is that the 24-25 FAFSA will only recognize "separated" as the status in cases of legal separation. However, not every state offers legal separation. As well, since legal separation in states that offer this often have significant costs that may be associated with them, the process can take up to 6 months or even a year and not every separation is amicable in which both parties are willing to sign the separation which can delay the process. Therefore, I request that ED reconsider the definition of separation so that undue burden is not placed on the student.	29) Thank you for your comment. The FAFSA form does not expressly state "legal separation."

0033	30	Please add the question on Student housing plan back to the 2024-25 FAFSA. Schools are required to create a Cost of Attendance(COA) that reflects whether the student will be On-Campus, Off-Campus or with a parent. If we are not able to obtain this information from the FAFSA and have to gather it in a different way, requiring additional forms that will cause delays in getting students offer notifications in a timely manner.	30) Refer to response for comment number <u>1</u> .
0034	31.a	Removal of housing question, will create significant and frustrating barriers for students. Please add that question back in order to expedite packaging for students, especially those who are comparing schools...imagining incoming students trying to compare COAs and offers from multiple schools, all attempting to determine the student's housing plans.	31.a) Refer to response for comment number <u>1</u> .
	31.b	In addition, asking about number in college, but not using it in the calculation will certainly create confusion for families.	31.b) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(ii)(XV).
0035	32	<p>On behalf of George Mason University, I am submitting comments to the Department of Education's Federal Register notice, Docket ID number ED-2023-SCC-0053.</p> <p>George Mason University is an R1 research university and the largest public institution in the Commonwealth of Virginia, with over 40,000 students. Mason offers more than 200 undergraduate and graduate degrees and numerous minors and certificate programs. Mason's six-year graduation rate exceeds the national average, with no disparity based on ethnicity or economic status.</p> <p>Mason appreciates the efforts of the Department to respond to the bipartisan law passed by Congress to make the FAFSA more user friendly for families and students. Being under resourced and understaffed, the Department faced many challenges, but we can now all celebrate as the official roll out is scheduled for later this year. We are confident that the simplified FAFSA will remove the obstacles that discouraged students from applying for the aid they need to achieve a college education.</p> <p>However, the removal of one critical question is of extreme concern. The question concerning the student's housing status needs to remain on future versions of the FAFSA.</p> <p>I will focus most of my comments on the first question the Department asked: Is this collection necessary to the proper function of ED? Our answer to that has to be a resounding YES. Financial Aid Offices are tasked with constructing a Cost of Attendance (CoA), and the new 2024-25 rules are beginning to dictate what has to be included in the CoA. Elimination of that question makes it next to impossible for a financial aid office to construct a Cost of Attendance accurately. Without that information, one of two things will happen. Schools will either come up with an "average" which will produce a CoA that is too high for some, possibly resulting in students borrowing more money than they need, or not high enough for others.</p>	32) Refer to response for comment number <u>1</u> .

		Schools then might have to request students submit housing information separately which will nullify the simplification process and result in delays of awards to students. We hope the Department will reconsider the removal of this necessary question from the FAFSA.	
0036	33	The FAFSA form does not state how receiving outside scholarships can impact a student's financial aid package. This practice is called scholarship award displacement. Scholarship award displacement is one of the root causes contributing to the student loan debt crisis. Need-based recipients cannot use their private scholarship funds to fund their gap after federal, state, and institutional aid, as intended by private scholarship donors, causing many students to borrow more or drop out of college. The Federal Student Aid continues to tell students to apply to as many scholarships as possible to decrease their debt, but does not have a disclaimer on how institutions penalize need-based recipients when they are awarded an outside scholarship. This department is misleading students into thinking that applying to outside scholarships will decrease their debt. Under the FSA handbook and 34 CFR § 668.61, the department opened the door to scholarship award displacement. Therefore, the department should spread awareness of this issue by putting a disclaimer on the FAFSA and other Federal Student Aid website materials.	33) Thank you for your comment. This issue either falls outside the scope of the FAFSA form or is too nuanced to be properly addressed in this context.
0037	34	The housing question needs to be added back. It does not make sense for every school to have to ask students their housing status. Eliminating the question will cause an unnecessary burden for students and/or result in a cost of attendance that is not appropriate for the student.	34) Refer to response for comment number <u>1</u> .
0038	35	Question 12 Student Race and Ethnicity - I understand this information will not be sent to the school. If that is the case, we should disclose that the the applicant.	35) This change will be made as requested.
0039	36.a	FAA since 2009 here to say please add the housing question back to the FAFSA. We need this to determine cost of attendance. Without the housing plans question on the FAFSA, our state system will have to come up with another form or way to collect that info from students before we can package their aid. This adds another requirement/hurdle for the student to clear.	36.a) Refer to response for comment number <u>1</u> .
	36.b	Also, is a method for undocumented parents to obtain an FSA ID to complete and sign the FAFSA forthcoming or will all students with undocumented parents have to submit a paper FAFSA and wait months, in an already shortened FAFSA season, for their FAFSA to be processed?	36.b) Thank you for your comment. Parents without a social security number will be able to create their own FSA ID.
0040	37.a	Can questions #10 & #35 Number in College be removed? It does not pertain to the SAI formula, and it no longer factors into the families Income Protection Allowance. On the Data Elements and Justification document, it states that question #10 is a data element specific to the FAFSA Simplification Act, but I don't see where and how it is? It's not listed at all in the SAI guide released by the department. This is from the SAI guide " Replacing the Expected Family Contribution (EFC) with the Student Aid Index (SAI) Not only will students and families see a different measure of their ability to pay for college, but they will also experience a change in the methodology used to determine aid. The new need analysis formula removes the number of family members in college from the calculation."	37.a) Refer to response for comment number <u>31.b</u> .
	37.b	Please add back the housing choice. How are schools going to set the COA for students who do not live on campus? Another form is how, so without this question, students will have to fill out yet another form at	37.b) Refer to response for comment number <u>1</u> .

		the school so that an accurate COA can be determined.	
	37.c	Can question #8 be clarified? Students may see this and think, "Yes, I would like to apply for an unsubsidized loan" without fully understanding what this question is asking. They may think that they have to check this box in order to be considered for loans. Can language be added that students are not eligible for federal grants and work-study if this option is selected? In addition, in my experience (15 years in a financial aid office), very few students who initially select this option, actually pursue this option. We get hundreds of students who elect not to put parental information on the FAFSA, and when we reach out to them to notify them that their only option is an unsubsidized loan, they quickly add their parent information. I would say we only have about 5-10 who actually pursue this option out of the hundred we receive.	37.c) This change will be made as requested.
	37.d	Can question #11 just list all of the genders instead of having a separate transgender question. Example: Male, Female, nonbinary, transgender, another gender, prefer not to answer.	37.d) Refer to response for comment number <u>91.c</u> .
	37.e	Can questions #18 and #36 be removed? Means tested benefits no longer affect the SAI calculation, so I'm not sure why these are needed. There is no more simplified needs test according to the 24-25 draft SAI document released by the Department.	37.e) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(ii)(XVII).
	37.f	Will students/parents be allowed to skip all of the tax questions if the direct data exchange is successful?	37.f) Thank you for your comment. Please refer to the 2024-2025 Data Elements and Justification document to view the questions that may be answered through the direct data exchange with the IRS.
	37.g	I would encourage the Department to rethink requiring family farm assets. I believe this affects small time farmers unfairly as assets are usually tied up in running the farm and cannot be liquidated to pay for college.	37.g) Thank you for your comment. Assets are defined by the statutory or regulatory requirements in the FAFSA Simplification Act.
	37.h	Question #28 and #38 - Is there a reason to ask if the parent/student received the earned income tax credit (EITC)? I don't see any reference to the EITC in the 24-25 draft SAI guide. The FAFSA also does not ask for an amount, so why is this question needed? The Data Elements and Justification document states this question is an additional data element required for eligibility determination, but I don't see where this is required as part of the SAI guide the Department released, especially since no amount is required.	37.h) Thank you for your comment. These additional data elements are required to aid in the accuracy of determining Pell Grant eligibility.
	37.i	Kudos on the addition of the ITIN so that those who file U.S. taxes but don't have an SSN can use the DDX and complete the FAFSA electronically.	37.i) Thank you for your comment.
0041	38	Please add back the housing question (where students indicate if they will live on-campus, off-campus, or with parents) to the FAFSA. At our institution, we use this question to determine cost of attendance. It is administratively burdensome for us to have to collect this information separately, and it would end up being more work for the student as they would be asked to fill out yet another form each year from the institution- it would not simplify the student's experience of applying for financial aid, it instead	37.b) Refer to response for comment number <u>1</u> .

		complicates it. Thank you for considering this request.	
0042	39	What happens to the parents/students who don't have an income? Will the IRS system/link be able to verify their non-filer status?	39) Federal Tax Information will differentiate between filers and non-filers (non-filers are those who have not filed taxes domestically with the IRS or with a foreign country).
0043	40	Why does the new need analysis formula remove the number of family members in college from the calculation? This is absolutely devastating for large families.	40) Thank you for your comment. The Department of Education implemented this change in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.
0044	41	Income tax paid refers to IRS form 1040: line 25 d. That is incorrect. Line 25d is just the total tax withheld. It should be line 22 as it was on the 2023-2024 FAFSA. - Also, on 2023-2024 FAFSA it specified that "Income tax amount is the total of IRS Form 1040 line 22 minus Schedule 2-line 2" which is the Excess advance premium tax credit repayment – not a tax but return of an over-payment. Shouldn't that be on this question?	41) Refer to response for comment number 13.a .
0045	42	In question 4 the grade level answer for graduate students "College graduate, professional, or beyond (MBA, M.D., Ph.D. etc.)" would be better if it said ""College graduate or professional degree or beyond (MBA, M.D., Ph.D. etc.)". That would make it clearer that it does not include students seeking a second undergraduate degree. And the words "or beyond" seem unnecessary.	42) Refer to response for comment number 23 .
0046	43	In the Notes pages, it would be helpful if all paragraphs on page 19 could indicate the appropriate question numbers that referred it with either "can I skip any questions" or "See Notes page xx". All Notes on the following pages have this feature.	43) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
0047	44	The spouse of a student does not have to answer questions 27-29 if they together filed a joint tax return (same for parents in questions 44-46). But instead of saying this it says "See Can I skip any questions?," on page 19. Since many probably don't read the notes, and to save time for those who do, replace the "Can I skip any questions" with the wording from page 19 – "Skip questions 27-29 if the student answered 'yes' to 'Did or will the student file a 2022 joint tax return with their current spouse.'" And do the same for the other parent in question 44. Otherwise, I envision many people filling in these questions when they shouldn't.	44) Refer to response for comment 43 .
0048	45	The housing question needs to be added back. This question is instrumental in helping institutions determine the appropriate COA for a student. At our institution there is a significant difference in the COA for students living off campus and those living with parents—an approximate \$10,000 difference. If institutions are forced to try to collect this information another way it could cause extended delays as students would have yet another form or process to complete before awarding could take place.	45) Refer to response for comment number 1 .
0049	46	Previously the FAFSA asked for certain untaxed income that are not on the tax returns, but the 2024-2025 FAFSA does not. Is this deliberate or an oversight?	46) Thank you for your comment. The Department of Education is permitted only to

		<p>They are: 401(k) etc. contributions (although IRA/SEP contributions are still required as untaxed income). Housing allowance Veterans noneducation benefits Workers compensation, disability benefits, etc Questions 41h &89h in 2023-2024.</p>	ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
0050	47	<p>I surprised and concerned to hear that the housing question has been removed from the 2024-2025 FAFSA. This question is used by many schools to determine an accurate cost of attendance budget which in turn affects a student's financial aid package. Although I agree with efforts to simplify the FAFSA, I am afraid in this instance it would actually do the opposite and cause more burden on the students. Schools will still need to gather this information and will have to create an additional form for students to complete to have this question answered. It is because of this additional burden placed on the students; I ask that the housing question be added back to the 2024-2025 FAFSA. Thank you for your consideration.</p>	47) Refer to response for comment number <u>1</u> .
0051	48	<p>I am very concerned with the removal of the ability to check FAFSA status using student identifiers (PII). In TRIO, it is very important for us to be able to check a student's FAFSA completion status. We do this for all current students and students we served last year. In EOC for example, it helps us to find those students who haven't done their FAFSA and we reach out to them and set up appointments to get it completed.</p>	48) Only the applicant and contributor(s) on a FAFSA form will be able to view the status of the FAFSA form through StudentAid.gov.
0052	49	<p>If we could make it simpler to create an fsaid and access fafsa without having to double check which link goes where that would be great. Making it more obvious on both websites what each site is or ensuring links to the other site are present so a student or parent or post secondary professional can navigate both sites better.</p>	49) The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
0053	50	<p>The Notes on page 19 say "If the parents are divorced or separated, answer the questions about the parent who provides the greater portion of the student's financial support." It leaves unanswered the question of how this is determined and over what time period? The tax year used on the FAFSA? The current calendar year? The 12 months prior to filing? And if it should be a perfect split, what is the tie breaker? Since this could be a major change for some families, it needs more elaboration.</p>	50) Refer to response for comment number <u>16</u> .
0054	51.a	<p>First are questions related to some big unknowns. How will these changes impact eligibility for financial aid – favorably and unfavorably? The National Association of Student Financial Aid Administrators (NASFAA) launched a tool to enable colleges to do some stress testing of what FAFSA simplification may mean to current enrollment. The tool was designed to provide some sense of how student eligibility for financial aid may change. This forecasting tool provides the best test we have to identify who may get more or less financial aid due to the simplification changes. The early signs are that FAFSA simplification will make some happy and others angry, though it seems more people will be happy, because they will see an immediate increase in eligibility for financial aid. Some colleges that have completed this stress test have seen a 10% – 30% increase in students who would be eligible for the Pell Grant. We won't know whether these projections are accurate until we are well into the cycle, but If we do see a 10% – 30%</p>	51.a) Thank you for your comment.

	<p>increase in eligibility for Pell, will the funding be there? Or the political will to increase funding? Or will more students get less support through Pell? Only time will tell.</p> <p>We also identified three primary flaws that need to be addressed before the new FAFSA is implemented. Each potential flaw could negatively impact access and unnecessarily complicate rather than simplify.</p> <p>Flaw #1 is the inclusion of farm or small business value in the formula. This will undoubtedly increase the perceived availability of a family's resources for college. Living in Iowa and working in Illinois, I know first-hand how punishing this will be for family farmers and small business owners. There's an old saying here in the Midwest that many farmers are "land rich, but cash poor." Without addressing this known issue with the simplified FAFSA, students from rural areas may simply opt out of higher ed because the family can't sell valuable, working farmland to send a kid to college. There are recent moves by some in the House to address this flaw, but it remains to be seen whether or not it will gain traction and be addressed in a timely manner.</p>	
51.b	<p>Flaw #2 is the omission of the number of students in college. This results in a dramatic overstatement of what a family can afford to pay, should the family have more than one family member enrolled or attending. While there are many ways colleges can address this, especially private colleges, this flaw will reduce eligibility for other important federal and state financial aid programs. Families with more than one child enrolled will feel this the most, but so will families with an adult returning for upskilling or reskilling. This is an easy fix and should be addressed.</p>	51.b) Thank you for your comment.
51.c	<p>Flaw #3 is more complicated, but incredibly important. Because FAFSA simplification is possible due to a much better interface with the IRS, there may be some unintended consequences that delay FAFSA submission and identification of the Student Aid Index (SAI). This potential flaw has to do with the need for a student to gain parental approval/permission to access IRS data for custodial and non-custodial parents' information. Imagine the nightmarish scenario of a student required to track down a non-custodial parent living in a foreign country; or begging permission from a parent who has been previously abusive; or asking a step-parent for permission to access their tax returns to see how much money they have to contribute, even when they've made it clear they are not willing to help with the cost of college. This flaw is detrimental to students and families. It plays with very complex family dynamics and seems ignorant of the world we live in. It will present barriers, slow the process, and may result in an increase in non-consumption of higher education. While it's possible DOE is addressing this already, professionals simply don't have enough information.</p> <p>Sadly, these flaws are statutory and can only be fixed by Congress. These flaws are not unknown, but there has been little movement on the part of Congress and time is running out. Legislators who care about access to higher education and keeping the U.S. competitive need to take action quickly to fix these flaws or delay implementation until they can be fixed.</p>	51.c) Thank you for your comment.

		<p>Speaking of timing, no one I've encountered believes that a new, truly improved and simplified FAFSA will be ready to go by October 1, which has consequences for the entire student recruitment cycle. Every week there's another article about delay. The group of pros I was with last week think December or January 2024 is more likely than October or November, and that is a problem.</p> <p>Simplification is long overdue, but it's important to get it right, rather than get it done quickly. It's critically important to fix these known flaws before implementation. Students and their families deserve better.</p>	
0055	52	<p>The prior FAFSAs collected data that was then subtracted from the available income, but they are not collected on this 2024-2025 draft. Does this mean that they are no longer to be an adjustment?</p> <ul style="list-style-type: none"> - Child support paid out - Work/Study earnings - Cooperative education earnings 	52) These items are no longer included in the eligibility calculation. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
0056	53	<p>Removing the Housing Question will result in students having inaccurate cost of attendance figures. Will also create more work in the Financial Aid Offices trying to determine the true costs of students entering into college. While the students answer to this question may not always be accurate at least it is something to drive the initial letter of aid to the student.</p>	53) Refer to response for comment number <u>1</u> .
0057	54	<p>The Housing question is needed for COA determination by the school, without we have to have students complete another form. The parent question regarding does either parent have a degree, needs to remain as is, we use this for first generation determination.</p>	54) Refer to response for comment number <u>1</u> .
0058	55	<p>-At least once each decade, the U.S. Department of Education focuses its attention on removing questions not required to calculate the expected family contribution (EFC, soon to be student aid index or SAI) from the Free Application for Federal Student Aid (FAFSA). Recognizing the Department now has some leeway to regulate some aspects of the cost of attendance, the rules governing need analysis and cost of attendance (COA) components remain primarily statutory.</p> <p>Completing the FAFSA is one step in the federal student aid application process and I applaud continued efforts to reduce its complexity as part of efforts to remove barriers to postsecondary education. With these efforts in mind, the U.S. Department of Education should permanently commit to retaining all data items on the FAFSA required to calculate the EFC (soon to be SAI) and COA, including all allowable costs categories listed in current statute. This will provide a method for students and families to initially self-identify applicable COA components and eliminate the need for institutions to develop separate forms and processes to construct initial student budgets. It will also free up staff resources currently devoted to the extra processes and procedures to collect information required to construct student budgets and allow these staff to focus on providing financial planning, advising, and counseling services to students.</p>	55) Refer to response for comment number <u>1</u> .
0059	56	<p>In Questions 18 and 36, Federal Benefits Received, one of the choices is "Refundable credit for coverage under a qualified health plan (QHP)". If this refers to the Net Premium Tax Credit on Schedule 3, Line 9 of</p>	56) Thank you for your comment. "Refundable credit for coverage under a qualified health plan

		the 1040 then the wording should be changed to match that of the 1040 and perhaps include the 1040 line reference.	(QHP)" matches language from the FAFSA Simplification Act. Additional guidance regarding how to answer this question will be provided.
0060	57	Does the "Consent to Retrieve and Disclose Federal Tax Information (FTI)" section of this FAFSA permit FTI to be articulated to TRIO grant administrators for Student Support Services eligibility determinations?	57) The redisclosure of FTI is only permitted to IHEs, State Higher Education Agencies, and designated scholarship organizations (prior to enactment) which includes United Negro College Fund and the Hispanic College Fund. This redisclosure authority is under the internal revenue code (IRC) 6103(l)(13)(D)(iii). No authority exists for the redisclosure to TRIO and other grant programs.
0061	58	Question 19 asks if the student did or will file a 1040, followed by a second question asking if the student earned income in a foreign country. Below the second question and following an arrow, it says if the answer is no skip questions 20-22. It would be better to say "if the answers to both questions above are no, skip questions 20-22". There should also be a space between this line and the line above it.	58) This change will be made as requested.
0062	59.a	A. Questions 37 and 44 for parent and other parent ask "did or will the parent (other parent) file a 2022 Form 1040 or 1040-NR?" If the answer is "No" they are asked to explain and one of the choices is that they did not file "for reasons other than low income." I am not aware of any other reasons beyond those already listed, so this choice could probably be eliminated. B. Further, if this choice must remain it should come after, not before, the far more common 'did not file any tax return because they did not earn any income.'	59.a) The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
	59.b	C. Also, the student section does not ask these questions. Shouldn't it?	59.b) Thank you for your comment. The student/student spouse questions and responses do not need to match the parent/parent spouse for questions 37 and 44.
0063	60.a	Comments on DRAFT 2024-2025 FAFSA Form dated 2023-03-02, and 2024-2025 DRAFT Pell Eligibility and SAI Guide dated November 2022: 1.Clarification: In the Note on page 21 of the FAFSA Form regarding "Investments do not include..." please add "Health Savings Accounts" and "education savings accounts owned by anyone other than the student or the student's parent (such as a grandparent or other relative) regardless of whether the student is the beneficiary" for clarity.	60.a) Thank you for your comment. This change will be made.
	60.b	2.Form collects data not used in Guide: The 2024-2025 DRAFT Pell Eligibility and SAI Guide dated November 2022 includes in Line 1.j. information on "Parent's Federal Work-study (FWS)" but this data is not collected in the FAFSA Form. Either remove it from the Guide or add it to the Form.	60.b) Thank you for your comment. Additional information regarding how schools should handle this item will be provided.

	60.c	3. Form collects data not used in Guide: The FAFSA Form Section 20 and Section 38 collect "Net profit or loss from IRS Form 1040 Schedule C" but the 2024-2025 DRAFT Pell Eligibility and SAI Guide dated November 2022 does not use this in the calculation of SAI. Either remove it from the Form or add it to the Guide.	60.c) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.
	60.d	4. Typo: Apparent typo in the 2024-2025 DRAFT Pell Eligibility and SAI Guide dated November 2022, line 22b, reads "IRS" when it probably should read "IRA."	60.d) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	60.e	5. Inconsistent language: In the 2024-2025 DRAFT Pell Eligibility and SAI Guide dated November 2022, inconsistent usage of "Parent" vs. "Parent's" and "Student" vs. "Student's" that should be reconciled. Example: the header above item 33 reads "Student Contribution from Assets" while the row above line 41 reads "Student's Contribution from Assets."	60.e) Thank you for your comment.
	60.f	6. Guide uses data not collected in Form: In the 2024-2025 DRAFT Pell Eligibility and SAI Guide dated November 2022, in Parent Contribution from Assets, item 12 titled "Trusts, stocks, bonds, derivatives, securities, mutual funds, tax shelters, qualified education benefits" has no corresponding entry on the FAFSA for and seems redundant to row 11 "Net worth of investments." Similarly in the Student Contribution from Assets section, item 35 seems redundant to item 34. Suggest removing items 12 and 35 from the Guide.	60.f) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
0064	61	<p>In response to (3) Estimation of Burden:</p> <p>Currently the ED projects that the FAFSA takes about 40 minutes to complete (annual burden hours divided by expected number of responses), however from my experience as a FAFSA submitter from 2013-2017 and again from 2021-presently, the FAFSA submission takes from 60 to 120 minutes to complete. Furthermore FAFSA verification takes about an additional 90 to 120 minutes to complete. These considerations should be included in the government's estimate of burden. If the department wishes to better measure this burden they could endeavor to calculate how long the average online applicant is signed-in to the FAFSA submission portal. However, it must also consider that students may have already gathered the necessary materials prior to submission and the time spent online reflects data entry and not data gathering.</p> <p>In response to (5) How might ED minimize the burden of this collection:</p> <p>Consider automatic reapplication for 4 years after the first FAFSA submission. This procedure would allow the ED to prepopulate information in the FAFSA submission that is unlikely to change, and to populate information already gathered by other government agencies (e.g., IRS). The FAFSA application would thus be pre-populated and students would be required to review and or edit and approve the application for submission. This would significantly reduce the burden on students who have already submitted an application at least once.</p>	61) Thank you for your comment.

		The time limit of 4 years is to reduce the burden on ED. Similarly, postsecondary institutions could be required to report when a student who previously received aid is no longer matriculated as a result of graduating or dropping out.	
0065	62.a	Question 4 The question about whether or not the student has their first Bachelor's degree has always seemed to confuse some students. If they could clarify the question from: "When the student begins the 2024-25 school year, will they have their first bachelor's degree"? to "When the student begins the 2024-25 school year, will they have earned/completed their first bachelor's degree"?	62.a) Refer to response for comment 43 .
	62.b	Marital Status (for the Student): Under Student Current Marital Status - curious as to why there is an option for "remarried". I can understand that for the parent, but unsure as to the purpose of having that "remarried" status for the student.	62.b) Thank you for your comment.
	62.c	Spouse Information Are there instructions for the following situations: Spouse is incarcerated? Spouse does not consent to have transmitted from IRS	62.c) The Department of Education has referred the spousal incarcerated suggestion to the appropriate business unit to review recommendations.
	62.d	Household Size for the student: Question 5 reads: The student has children or other people (excluding their spouse) who live with the student and receive more than half of their support from the student now and between July 1, 2024, and June 30, 2025. (emphasis added) The household size question (#9) for the student reads: Include the student (and their spouse) and the student's dependent children, even if they live apart from the student because of college enrollment. Also include other people if they live with the student and the student will provide more than half of their support between July 1, 2024, and June 30, 2025. The use of the word NOW should be included in both questions or removed from both questions to be consistent.	62.d) This change will be made.
	62.e	Student and Spouse tax return information (questions 20 & 28) - also applies to parent tax return information and other parent tax information (questions 38 and 45) as they have similar references. Income earned from work: IRS Form 1040 - line 1. Should it be IRS Form, line 1a to be consistent with 1040-NR? Reference for 1040-NR - should that be included in all fields, even if it is the same as the 1040? It is listed separately in income earned from work, but not in the other income fields.	62.e) Refer to response for comment number 13.a .

	62.f	Income tax paid - I believe it should be referencing line 22 from the 1040/1040-NR (not 25d) Earned income tax credit - should be line 27 (not 27a) for the 1040. There doesn't appear to be an EITC for a 1040-NR tax filer. Makes the case to make the distinction between the two returns in all income questions.	62.f) Refer to response for comment number 13.a .
	62.g	Not sure how many families will know if they filed a Schedule A, B, D, E, F, or H. What is the purpose of adding this question? Could the fields that reference a specific schedule be grouped together? For example, there is a field referencing IRA deductions (reference Schedule 1) and then, 5 fields later, there is the Foreign Earned Income exclusion field, which also references Schedule 1. It would be helpful to have these grouped together.	62.g) Thank you for your comment. 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®).
	62.h	Living arrangements Please add the question regarding living arrangements while in college back to the application (on campus, off campus, relatives) .	62.h) Refer to response for comment number 1 .
	62.i	Parent Identity Information (question 30, also found on Question 1,25, and 30 respectively). Instructions read: The parent's full name exactly as it appears on their Social Security card. Not all parents or spouses will have a social security number/card. Some suggestions could be: The parent's full legal name exactly as it appears on their Social Security card or birth certificate (if the parent does not have a Social Security number/card) Social Security Number- can there be instructions on the form that inform the parent/other parent (and student spouse) what to do if they do not have an SSN? Example: If your parent does not have a Social Security Number, you must enter 000-00-0000	62.i) This change will be made.
	62.j	Question 36 Federal Means Tested Benefits There are quite a few states that have decided to keep in place the free lunch program for all students, regardless. This could greatly increase the number of folks who answer yes to free/reduced lunch, not knowing if the program is state program and not federally funded. 5 states provide these same free lunches: California, Colorado, Maine, Minnesota and as of March 28th, New Mexico	62.j) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	62.k	Question 45 Is rollover captured from the IRS or does the income filer need to state the amount?	62.k) Thank you for your comment. If there is a rollover amount to report for question 45 it must be manually reported.
0066	63.a	With the removal of the housing question from the FAFSA, it is difficult for the school to accurately determine the cost of attendance for each student, as we would have no knowledge of their housing choice without having to require additional information or forms. In this case, the oversimplification of the form by cutting out necessary questions is going to cause almost all schools to require gathering of additional data to calculate each student's budget. This affects all students, not just a select group of	63.a) Refer to response for comment number 1 .

		students on which we would need to find a way to gather this additional information.	
	63.b	Living in the heart of the Midwest, the small business exclusion, or the exclusion for a family farm on which the family resides is going to make a drastic impact on students in our area. Currently, a family with an AGI of \$60,000 and a farm or business worth \$1 million would have an EFC of \$7,626. Under the new formula, that same family would be expected to contribute \$41,056. Farms and businesses are different from other liquid assets that could easily or quickly be sold for cash to pay for students' education, and does not give an accurate account of a family's available contribution. On the new FAFSA, it asks for you to determine your farm or business net worth. How do you accurately and easily determine your net worth? It's my understanding this is not an amount that can be pulled from taxes.	63.b) Thank you for your comment. 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®) form.
0067	64	I have been working in a financial aid office fore the last 5 years. Something needs to be overhauled when it comes to the dependency standards. I get multiple potential students under the age of 24 that are self supporting and without contact with their parents. We are not living in the 60s and 70s anymore. Its time to change the dependency standards to a younger age. It is absolutely ridiculous that a student age 23 has to have their parents information on their FAFSA. Most students at 4 year universities will graduate by the time they are 21. Lets do something to stop preventing ADULTS in their early 20s from getting an education.	64) Thank you for your comment.
0068	65	The 2024-2025 FAFSA must continue to include the student's housing plan for each of the colleges listed on their application. This information is very important and may vary for each college being listed. Without this important intel, colleges will likely have to develop another way to collect the information, adding to the administrative burden on the financial aid office as well as adding an additional requirement for students to report each year.	65) Refer to response for comment number <u>1</u> .
0069	66	Please reconsider the removal of the 'interested in work study' and 'housing plans' questions from the updated FAFSA. Many colleges use the information gathered in these fields in their packaging and budgeting processes, and their removal will cause an additional burden to schools as they will need to find work arounds for the missing data. Thank you for your consideration.	66) Refer to response for comment number <u>1</u> .
0070	67	Please indicate on questions 11 and 12 that this information will not be sent to institutions. Although it does indicate that the information will not impact need eligibility and that it will be used for research purposes only, it does not explicitly state that this information will not be sent to schools/will only be used by DOE. I worry that students could have concerns about completing these questions for that reason.	67) This change will be made as requested.
0071	68	On the "2024-2025 Draft Pell Eligibility and SAI Guide" the chart for Table A4 - Parent asset protection allowance - has the heading "age of older parent as of 12/31/2023". That is the age on the 2022-2023 chart and since it goes up each year it should be "as of 12/31/2024.	68) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
0072	69	Regarding the FAFSA simplification. If 99% of colleges use the question on the FAFSA about where the	69) Refer to response for comment number <u>1</u> .

		<p>student will live when attending, why does it need to be removed? You might want to check with the actual people in the trenches at colleges and not rely on a focus group. This seems to be an "over-simplification" of the FAFSA, as the question is quite relevant and useful. Please consider leaving it in. Removing it can end up causing more problems than it is worth. The phrase "Penny-wise and pound foolish" comes to mind. Thank you.</p>	
0073	70	<p>It is very important to our assignment of appropriate packaging and COA components students to know whether or not a student will be residing on campus or living off campus, not with their parents. We don't have another mechanism to get this information other than the FAFSA to allow us to assign the appropriate budget and award amounts.</p> <p>We also have a very limited FWS allocation and we use the question on the FAFSA referring to interest in Work-study to determine whether or not to offer FWS in the financial aid package.</p> <p>I would strongly request these questions be left on the FAFSA.</p> <p>Thank you.</p>	70) Refer to response for comment number <u>1</u> .
0074	71	<p>I would like Department of Ed to consider the ramifications of requiring students to essentially get 2 parent signatures on the FAFSA moving forward. With the requirement to have the "other" parent sign and consent to the information on the FAFSA this just creates more hoops for students to jump through and more barriers to their education. I have seen many stepparent situations where the stepparent does not feel responsible for the student and does not agree to help them in any way. In the past the biological parent could do the FAFSA and sign, the student could get aid. By requiring the stepparent (other parents) signature on this FAFSA in remarried parent situations you are essentially preventing the student from EVER completing that FAFSA.</p>	71) Refer to response for comment number <u>28</u> .
0075	72	<p>The Summary of Enhancements to the FAFSA form for 2024-25 says that if any party does not provide consent for importing from the IRS then the submission of the form will still be allowed, but a Student Aid Index will not be calculated.</p> <p>What will they have to do next?</p> <p>Also, what happens if they do consent but the link to the IRS does not work? This has sometimes happened in the past for various reasons.</p>	72) Thank you for your comment. The applicant and any contributor(s) required to be on the FAFSA form must provide consent and approval for an SAI to be calculated. Any party that does not provide affirmation initially will receive a follow-up email requesting they do so. If there is an issue with IRS connectivity while a user is working on the FAFSA form a message will display stating that the IRS is unavailable, and the user should try again later. The user will be informed that they may choose to continue and manually provide their tax return information, which will be used to calculate their Student Aid Index; however, federal student aid eligibility

			may change once access to the IRS system is restored and the Department of Education can validate their manual entries.
0076	73.a	The biggest issue I see is the small business exclusion from assets. I work in a huge farming community. Most of these farms have a net worth of a million dollars but they can't sell a single asset they have to pay for their students' attendance at college as without that \$100,000 tractor that is paid off, they can't farm. A local copy/printing business can have \$100,000 in copiers and equipment but can't sell those to send their child to college or they won't have a business. Most small businesses have all of their money tied up in their equipment so it is not liquefiable which in turn shouldn't throw them out of federal funding for their children.	73.a) Thank you for your comment.
	73.b	The second issue is deleting the housing option. We teach financial literacy which we use for the students budgeting. The college requires this for their side of total cost of attendance so this could cause the college to have to have a separate document which is another hump in the road that a low income and/or first generation student could get held up over. The more documents they have to turn into the college, increases the odds of them not going. Have seen this many times in my 18 years in the higher education field.	73.b) Refer to response for comment number <u>1</u> .
	73.c	Third is section 11 and 12 are for research purposes. It is not necessary. So if it isn't required and you are trying to shorten the fafsa, these should be removed.	73.c) Thank you for your comment. These questions are required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(ii).
	73.d	Fourth is Section 15 - I used to believe this question helped the colleges in determining first generation. The way it is stated, it won't answer that! This question should have the statement "The answers to these questions do not affect aid eligibility and will not be used in any aid calculations. They will be used for research purposes only" as I believe it has no bearing on their eligibility. Could also be removed to actually shorten the FAFSA if not going to ask the question correctly to help the college financial aid office in determining first generation by the federal definition.	73.d) Thank you for your comment. The question and response options will be revised.
	73.e	Fifth is Section 10 and 35 number in college. From what I have been told, the number of children in college will no longer affect the formula so why are we asking this? If it is for research, we should again put that statement "The answers to these questions do not affect aid eligibility and will not be used in any aid calculations. They will be used for research purposes only".	73.e) Refer to response for comment number <u>31.b</u> .
0077	74.a	A printed or PDF version of the FAFSA that is 21 pages long - more than double the length of the current paper/PDF version of the FAFSA - is inconsistent with the intent of the FAFSA Simplification Act. Even though the number of numbered questions is only 49, compared with 108 previously, the form feels longer. Although the online FAFSA is shorter due to use of data transferred from the IRS and intelligent skip logic,	74.a) Thank you for your comment. 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

	<p>the printed/PDF version is longer and feels longer. This is intimidating and will discourage some low-income students and their families from completing the printed/PDF form. This makes the printed/PDF version of the new FAFSA an even greater barrier to college access for low-income students.</p> <p>We do appreciate that the printed/PDF version of the FAFSA uses a larger, more readable font size. This is more accessible to people with vision impairments. But, even without enlarged fonts, the printed/PDF form is longer.</p> <p>To reduce the intimidation factor, you could separate the form itself from the instructions, like the IRS does on its forms. That would reduce the length of the form from 21 to 14 pages.</p> <p>It is unfortunate that simplifying the FAFSA is so complicated.</p>	Application for Federal Student Aid (FAFSA®).
74.b	<p>On an unrelated note, several of the tax forms and tax form line numbers are incorrect for 2022. We noted a few examples below, but there are many more. It is recommended that you carefully review all of the 2022 tax forms and line numbers again.</p>	74.b Refer to response for comment number 13.a .
74.c	<p>This draft does not address multiple support agreements, even though the U.S. Department of Education is required to do so by the FAFSA Simplification Act.</p> <p>The draft does not address how to determine which parent is responsible for completing the FAFSA, other than stating that this is the parent who provided more financial support to the student. Is this based on the most recent 12 months? The tax return filed during the prior-prior year? Is it based on the IRS definition of financial support, such as the worksheet at [link].</p>	74.c) Refer to response for comment number 16 .
74.d	<p>Two-step authentication may be a problem for low-income students who don't have a mobile phone or email address. Some may be filing a FAFSA through their school or a college financial aid office. If they do have an email address, it may be one provided by their school. Please consider this and provide options for such students.</p>	74.d) Thank you for your comment. This issue either falls outside the scope of the FAFSA form or is too nuanced to be properly addressed in this context.
74.e	<p>Please do a test print of this form, since some of the formatting doesn't seem to appear correctly when printed.</p>	74.e) Thank you for your comment. The form is not yet finalized.
74.f	<p>If you search through the PDF, the paragraphs seem to be in a random order, as opposed to top to bottom on each page. This makes searching for specific text or specific questions difficult. Maybe you should establish a tab order at least for the questions so that they are in the natural order.</p>	74.f) Thank you for your comment. 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®).
74.g	<p>The term "FAFSA Form" is redundant, since the first "A" in "FAFSA" stands for "Application". You use FAFSA Form throughout the document, so you will need to remove references to Form repeatedly.</p>	74.g) Refer to response for comment 43 .

74.h	Why did you drop the phrase “It is the fastest and easiest way to apply for aid.” from the first page of the FAFSA?	74.h) Refer to response for comment 43 .
74.i	The addition of square fields may be a source of confusion, since applicants will be accustomed to writing alphanumeric characters in a square field. While the intention is for circles to represent a “select one” choice and squares to represent a “select all that apply” choice, perhaps there could be a different shape?	74.i) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
74.j	Since there is room in the Special Circumstances section of the form, perhaps include a few more examples of common special circumstances, such as more of the ones listed in the statute? The statutory examples also include nursing home expenses, unusually high child care or dependent care costs, parents enrolled at least half-time in college, homelessness or other changes in a family’s income, a family’s assets or a student’s status.	74.j) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
74.k	The instructions on filling out circle and square fields are a bit confusing. In the form itself, for some of the squares, you have “Select all that apply” but you don’t have any language in front of the circles. Maybe you should have “Choose one” before each such set of circles.	74.k) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
74.l	Filling in the circle with the minus sign is unlikely to be used correctly. We strongly recommend user testing of the draft form with focus groups.	74.l) This formatting is currently being revised.
74.m	Why did you change the name of the results from Student Aid Report (SAR) to FAFSA Submission Summary (FSS). The former is easier to pronounce and doesn’t have letters like “F” and “S” that are confusable when spelled out.	74.m) Thank you for your comment. The Department of Education gathered a considerable amount of input from many parties and usability studies and used current industry design standards and best practices to implement this change.
74.n	In the last paragraph, you switch from using “FAFSA” or “FAFSA Form” to using “application”. Why not be consistent throughout the form to use just one term, such as “FAFSA.”	74.n) Thank you for your comment.
74.o	In the Apply by the Deadlines section you use “you may need to complete additional forms” while on page 2 you use “you may need to fill out separate forms” and in the specific states you use “More forms may be required.” This is all highly nonspecific and inconsistent.	74.o) No change. State deadline text is provided by the respective states/territories.
74.p	The chart is more readable, but surely you could provide a definite date instead of “Ask your financial aid office” for the 25 states that don’t list a deadline date?	74.p) No change. Deadline information is provided by states/territories.
74.q	The postal abbreviation for Arkansas is AR, not AK. AK is the abbreviation for Alaska.	74.q) This change will be made as requested.
74.r	Increasing the number of colleges that can be listed on the paper form to 10 (and online to 20) is an improvement. While we discourage students from applying to too many colleges – we consider the “million dollar scholar” fad to be counseling malpractice – allowing only 4 spaces was too few. Nevertheless, the instructions for adding more colleges says to “follow the instructions for correcting your FAFSA form.” Doesn’t fafsa.gov now refer to this as “Add or Change Schools” and separate it from making corrections? If so, shouldn’t you write “follow the instructions for adding or changing schools”?	74. r) This change will be made as requested.
74.s	In the paragraph about non-federal assistance, the two organizations listed (American Medical Association and American Bar Association) are both focused on professional degrees. Perhaps you could	74.s) Thank you for your comment. The Department of Education believes the current

		list an organization that is also focused on undergraduate degrees, such as the Mathematical Association of America or American Chemical Society, American Society for Microbiology, American Physical Society, Association for Computing Machinery, IEEE, American Geosciences Institute, etc.?	instructions provide adequate guidance.
74.t		In the paragraph “We may request additional information from you to process your application more efficiently. We will collect this additional information only as needed and on a voluntary basis.” doesn’t the FAFSA Simplification Act establish new restrictions on asking additional questions? See 20 USC 1090(a) (5): “No additional information requests permitted. -- In carrying out this subsection, the Secretary may not require additional information to be submitted by an applicant (or the parents or spouse of an applicant) for Federal financial aid through other requirements or reporting, except as required under a process or procedure exercised in accordance with the authority under section 479A.”	74.t) This text will be updated.
74.u		In the “Why all the questions?” paragraph, the sentence “The state and the colleges you list may also use some of your responses to determine if you may be eligible for school or state aid, in addition to federal aid.” begins with “state and the colleges” but ends with “school or state aid” reversing the order. Please be consistent in listing the same thing first.	74.u) This change will be made as requested.
74.v		In the “Note” in the middle of the right column, insert the word “original” before “school codes listed” for clarity.	74.v) This change will be made as requested.
74.w		Why can’t you include 20 schools in the paper/PDF version of the FAFSA. What’s one more page when you are already at 21 pages for the “simplified” form.	74.w) Thank you for your comment.
74.x		In the Privacy Act Statement, it says, “In addition, we may send your information to a foreign , federal, state, or local enforcement agency if the information that you submitted indicates a violation or potential violation of law, for which that agency has jurisdiction for investigation or prosecution.” Since when does the U.S. Department of Education share FAFSA information with foreign agencies?	74.x) This text will be updated.
74.y		In the second-to-last paragraph of the Privacy Act Statement, it says, “If you have comments or concerns regarding the status of your individual submission of this form, please contact the Federal Student Aid Information Center, P.O. Box 84, Washington, D.C. 20044 directly.” Why not include the telephone number for the FSAIC here, 1-800-433-3243.	74.y) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
74.z		The language on this page seems to be appropriate for the online FAFSA, not a printed or PDF version of the FAFSA. For example, one does not need an FSA ID to sign a paper version of the FAFSA. On the other hand, some of the authorizations still apply.	74.z) This change will be made as requested.
74.aa		The “n” in “Social Security number” should be capitalized, yielding “Social Security Number.” After all, the acronym is SSN and not SSn. Note that you capitalized it correctly on page 20.	74.aa) The lowercase “n” is correct and aligns with SSA.gov.
74.ab		The language on this page shifts from being written from the applicants perspective, to the parent’s perspective in the fifth bullet point (e.g., where it refers to “my child’s”).	74.ab) Thank you for your comment. This text is worded for a contributor’s perspective as it is needed to obtain consent and approval from said contributor.
74.ac		When listing the date of birth, why not put MM, DD and YYYY under the respective fields for additional	74.ac) Refer to response for comment 43 .

		clarity, rather than bunching them up.	
74.ad		Applicants do not necessarily know the two-character country code for their country. You may wish to include a link to a lookup table for the country codes. Or, in the instructions, include the most common country codes. Also, will you still be using “FC” to mean “Foreign Country?”	74.ad) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
74.ae		The instructions for “Separated” do not specify whether it includes just legal separation or also informal separation.	74.ae) Refer to response for comment number <u>29</u> .
74.af		The “n” in “Social Security number” should be capitalized, yielding “Social Security Number.” After all, the acronym is SSN and not SSn. Note that you capitalized it correctly on page 20.	74.af) Refer to response for comment number <u>74.aa</u> .
74.ag		Add “(US)” after “Mobile phone number” to emphasize that this is a U.S. phone number. Some international phone numbers will fit in 10 spaces.	74.ag) Refer to response for comment <u>43</u> .
74.ah		In the question “When the student begins the 2024–25 school year, will they have their first bachelor’s degree?” insert the word “already” after “they” for additional clarity.	74.ah) This change will be made as requested.
74.ai		Why are you asking, “Will the student be pursuing an initial teaching certification at the elementary or secondary level?” when the college should know this information already?	74.ai) Thank you for your comment. This question is needed to properly set the Pell eligibility flag on the ISIR so schools can award Pell funds to students who are otherwise ineligible due to already having a bachelor’s degree.
74.aj		In the question “When the student begins the 2024–25 school year, what will their college grade level be?” the answer “College graduate” is confusing and should be revised. We know what you meant, but students who are pursuing a second Bachelor’s degree or post-baccalaureate certificate will be confused.	74.aj) Refer to response for comment number <u>23</u> .
74.ak		With regard to question 7, consider adding a mention of <ul style="list-style-type: none"> • Court protection from abuse orders against the parents Parent whereabouts unknown	74.ak) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
74.al		Please state whether the answers to the questions about gender and race will be shared with the college and/or the state. The answers to these questions can be sensitive (e.g., transgender) and so shouldn’t be shared. But, regardless, you should indicate whether or not they are shared.	74.al) This change will be made.
74.am		Suggest adding additional options under Asian, such as Hmong, Cambodian, Thai, Pakistani, Laotian, Taiwanese and Nepalese. These are all pretty populous in the U.S. Perhaps you could establish a population count threshold for listing a race option.	74.am) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
74.an		In the question about the student’s gender, we suggest inserting the word “now” after the word “gender” or the word “current” before the word “gender” to emphasize that it is the current gender and not the gender that appeared on the student’s birth certificate.	74.an) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
74.ao		We suggest aligning the “MM” and “YYYY” under their respective fields instead of bunching them up.	74.ao) Refer to response for comment <u>43</u> .

	74.ap	The question about Parent Education Status is not very useful for determining whether the student is a first-generation college student. A parent could have attended college but not graduated. The book, <i>Who Graduates from College? Who Doesn't?</i> , finds that whether the student's parent graduated with a Bachelor's degree or more advanced degree is the best predictor of the student's college completion. Thus, perhaps you should replace "Did either of the student's parents attend college?" with "Does either of the student's parents have a Bachelor's degree?" Failing that, then "Did either of the student's parents graduate from college?"	74.ap) Refer to response for comment 73.d .
	74.aq	In addition, this question should specify that the student should answer about their biological parents and not necessarily the legal parents.	74.aq) Thank you for your comment. "Parent" is not specifically defined as a biological parent in the FAFSA Simplification Act.
	74.ar	In the question about means-tested federal benefit programs, perhaps include LIHEAP?	74.ar) Thank you for your comment. 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®).
	74.as	Income tax paid should line 22 of IRS Form 1040 (2022), the total income tax liability, not line 25d. Line 25d is the sum of the amounts withheld, which is not even the correct figure for income tax payments.	74.as) Refer to response for comment number 13.a .
	74.at	Can't income earned from work, income tax, untaxed portions of IRA distributions and untaxed portions of pension distributions be negative? In previous years, the instructions said, "If negative, enter a zero here."	74.at) Refer to response for comment number 13.a .
	74.au	In the question about Annual Child Support Received, do any students ever receive \$1 million or more in child support?	74.au) Thank you for your comment. The field length is the same as in prior years and mirrors the format of other asset fields.
	74.av	The removal of the Housing Plans option is beneficial. Too often a student is unsure about their housing plans and picks "with parent" or "off campus," not realizing that this reduces the amount of aid for which they are eligible. When they later change their mind, some colleges will not increase the amount of aid awarded to them. It is better for the college to make a financial aid offer based on the assumption of the default option (e.g., on-campus), and then make an adjustment later when the student's actual housing arrangements are known.(There have been calls for financial aid administrators to "vote" against the removal of housing plans on a few mailing lists, so you may get inundated by public comments seeking a restoration of this question.)	74.av) Thank you for your comment.
	74.aw	In the signature statement, perhaps state clearly that the student will not be eligible for federal student aid. By saying "we cannot process this FAFSA form," you suggest that the student will be eligible for financial aid if they do not consent to transfer tax information.	74.aw) Thank you for your comment. This text will be revised.

74.ax	In the date signed, why not put MM, DD and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.ax) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.ay	Please consider inserting the word "below" after the word "circle" in the third sentence of the signing statement.	74.ay) This change will be made as requested.
74.az	The "n" in "Social Security number" should be capitalized, yielding "Social Security Number." After all, the acronym is SSN and not SSn. Note that you capitalized it correctly on page 20.	74.az) Refer to response for comment number 74.aa.
74.ba	In the date of birth, why not put MM, DD and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.ba) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.bb	Add "(U.S.)" after "Mobile phone number" to emphasize that this is a U.S. phone number. Some international phone numbers will fit in 10 spaces.	74.bb) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.bc	Income tax paid should line 22 of IRS Form 1040 (2022), the total income tax liability, not line 25d. Line 25d is the sum of the amounts withheld, which is not even the correct figure for income tax payments.	74.bc) Refer to response for comment number 13.a.
74.bd	Can't income earned from work, income tax, untaxed portions of IRA distributions and untaxed portions of pension distributions be negative? In previous years, the instructions said, "If negative, enter a zero here."	74.bd) Refer to response for comment number 13.a.
74.be	In the signature statement, perhaps state clearly that the student will not be eligible for federal student aid. By saying "we cannot process this FAFSA form," you suggest that the student will be eligible for financial aid if they do not consent to transfer tax information.	74.be) Thank you for your comment. This text will be revised.
74.bf	In the date signed, why not put MM, DD and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.bf) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.bg	Please consider inserting the word "below" after the word "circle" in the third sentence of the signing statement.	74.bg) This change will be made as requested.
74.bh	The "n" in "Social Security number" should be capitalized, yielding "Social Security Number." After all, the acronym is SSN and not SSn. Note that you capitalized it correctly on page 20.	74.bh) Refer to response for comment number 74.aa.
74.bi	In the date of birth, why not put MM, DD and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.bi) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.bj	Add "(U.S.)" after "Mobile phone number" to emphasize that this is a U.S. phone number. Some international phone numbers will fit in 10 spaces.	74.bj) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.bk	In the date the parent became a legal resident, why not put MM and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.bk) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.

74.bl	In the question about means-tested federal benefit programs, perhaps include LIHEAP?	74.bl) Refer to response for comment number 74.ar.
74.bm	Can't income earned from work, income tax, untaxed portions of IRA distributions and untaxed portions of pension distributions be negative? In previous years, the instructions said, "If negative, enter a zero here."	74.bm) Refer to response for comment number 13.a.
74.bn	Income tax paid should line 22 of IRS Form 1040 (2022), the total income tax liability, not line 25d. Line 25d is the sum of the amounts withheld, which is not even the correct figure for income tax payments.	74.bn) Refer to response for comment number 13.a.
74.bo	Can't income earned from work, income tax, untaxed portions of IRA distributions and untaxed portions of pension distributions be negative? In previous years, the instructions said, "If negative, enter a zero here."	74.bo) Refer to response for comment number 13.a.
74.bp	In the signature statement, perhaps state clearly that the student will not be eligible for federal student aid. By saying "we cannot process this FAFSA form," you suggest that the student will be eligible for financial aid if they do not consent to transfer tax information.	74.bp) Thank you for your comment. This text will be revised.
74.bq	In the date signed, why not put MM, DD and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.bq) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.br	Please consider inserting the word "below" after the word "circle" in the third sentence of the signing statement.	74.br) This change will be made as requested.
74.bs	The "n" in "Social Security number" should be capitalized, yielding "Social Security Number." After all, the acronym is SSN and not SSn. Note that you capitalized it correctly on page 20.	74.bs) Refer to response for comment number 74.aa.
74.bt	Add "(U.S.)" after "Mobile phone number" to emphasize that this is a U.S. phone number. Some international phone numbers will fit in 10 spaces.	74.bt) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
74.bu	Students with divorced or separated parents might get confused by Other Parent Identity Information and provide information about the non-custodial parent. This might happen if the student doesn't read the instructions on Page 19 (or perhaps even if they do).	74.bu) This text is under revision.
74.bv	Income tax paid should line 22 of IRS Form 1040 (2022), the total income tax liability, not line 25d. Line 25d is the sum of the amounts withheld, which is not even the correct figure for income tax payments.	74.bv) Refer to response for comment number 13.a.
74.bw	Can't income earned from work, income tax, untaxed portions of IRA distributions and untaxed portions of pension distributions be negative? In previous years, the instructions said, "If negative, enter a zero here."	74.bw) Refer to response for comment number 13.a.
74.bx	In the signature statement, perhaps state clearly that the student will not be eligible for federal student aid. By saying "we cannot process this FAFSA form," you suggest that the student will be eligible for financial aid if they do not consent to transfer tax information.	74.bx) Thank you for your comment. This text will be revised.
74.by	In the date signed, why not put MM, DD and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.by) Thank you for your comment. The Department of Education considers this

			suggestion a stylistic preference.
	74.bz	Please consider inserting the word “below” after the word “circle” in the third sentence of the signing statement.	74.bz) This change will be made as requested.
	74.ca	Aren’t paid preparers of the FAFSA no longer permitted? If so, why not include the language “Paid preparers are prohibited.” here?	74.ca) This change will be made as requested.
	74.cb	In the date signed, why not put MM, DD and YYYY under the respective fields for additional clarity, rather than bunching them up.	74.cb) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
	74.cc	Replace “check with the financial aid office at the college” with “contact the financial aid office at the college.”	74.cc) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
	74.cd	With regard to emancipation and legal guardianship, please address what “state” means. For example, if the student was living in a foreign country and a court in that country determined them to be an emancipated minor or in a legal guardianship, does that count? This happens more frequently than you might expect.	74.cd) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
	74.ce	In the sentence “U.S. territories include Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the Northern Mariana Islands.” perhaps you could include the territory abbreviations, yielding “U.S. territories include Puerto Rico (PR), Guam (GU), American Samoa (AS), the U.S. Virgin Islands (VI), and the Northern Mariana Islands (MP).” Also, what happened to the Republic of Palau (PW), the Marshall Islands (MH) and the Federated States of Micronesia (FM)?	74.ce) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
	74.cf	What does “debt related to those same” mean? Does it mean secured by the asset, which is the plain language of the statute at 20 USC 1087vv(g)? Why not have the FAFSA language clearly reflect the intent of the statute?	74.cf) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
	74.cg	The exclusion of life insurance from the definition of investments is inconsistent with the statutory language, which includes tax shelters within the definition of assets at 20 USC 1087vv(f).	74.cg) Thank you for your comment. The guidance to exclude life insurance as an asset has not changed.
	74.ch	For the exclusion of annuities from the definition of investments, please specify whether this is just qualified annuities or also non-qualified annuities.	74.ch) No change. Annuities are not differentiated by the FUTURE Act or the FAFSA Simplification Act.
	74.ci	In the parenthetical after retirement plans, please include 403(b) after 401(k). Also, SEP and SIMPLE plans. Are they omitted because they aren’t reported on tax returns? But, doesn’t that only apply to contributions, not as assets/investments? And, shouldn’t they be specified as being excluded? Any other major plans that should or shouldn’t be included (e.g., 457 plans)?	74.ci) Thank you for your comment. The parenthetical is not all-inclusive, which is indicated using “etc.”
0078	75	The housing question is used by more than just the Financial Aid Office here and would be best to remain on the FAFSA after simplification. It allows us to automatically assess a more accurate cost of attendance	75) Refer to response for comment number <u>1</u> .

		prior to registration and gives our residence life colleagues an opportunity to reach out & discuss the onboarding process for living on campus. Please consider leaving this question!	
0079	76.a	For the section where the student is asked to enter their ITIN if the don't have a SSN: What if a student didn't file taxes? Will they still have a ITIN or will their parent's work? What if their parent didn't file taxes?	76.a) This change will be made.
	76.b	Will students be eligible for aid if they don't have a SSN and are not eligible noncitizens? What is the process like if so?	76.b) Applicants must be US citizens or eligible noncitizens to qualify for Federal student aid.
	76.c	If a student's parent does not have a SSN, will they still have to print out the signature page and mail it, and if so, will the instructions be clear about how the page needs to be signed so that the parent does not have to mail the page several times?	76.c) Starting in 2024-25, a parent without an SSN will be able to create an FSA ID and sign the FAFSA form electronically.
0080	77	Please add the housing choice back onto the FAFSA. It will add more work for us and the students to collect this information in order to get the correct cost of attendance for our students as well as getting their financial aid awards out in a timely fashion.	77) Refer to response for comment number <u>1</u> .
0081	78	I want to echo the concern over removing the student housing choice question from the FAFSA. This question is essential in building an accurate cost of attendance to be able to package a student correctly. Without the housing choice question, the financial aid office will need to collect this information from students through another method, which will result in putting an additional hurdle in front of students. I appreciate the efforts to simplify the FAFSA process; however this change will add complexity for everyone involved.	78) Refer to response for comment number <u>1</u> .
0082	79.a	For the Federal Student Aid Information Center (FSAIC) Corrections and fafsa.gov —Corrections, any applicant or parent should also be able to correct their social security number, if it was entered incorrectly.	79.a) Thank you for your comment. Parties to the FAFSA form will continue to be able to correct their SSN online and via a paper FAFSA Submission Summary formerly known as the Student Aid Report. The Department of Education will provide adequate guidance and instructions to assist customers with the completion of this task.
	79.b	In addition, with schools going test optional the fafsa.gov should allow respondents to include 20 institutions	79.b) Students will be able to list up to 20 colleges on their online FAFSA form.
	79.c	Third, it is burdensome to both the schools, parents, and students to have separate fsa.gov login IDs and that each time an SAR needs to be accessed, the parent has to have the student login as well.	79.c) This new form design allows users to fill out only the portion of the form pertinent to them. Each role (student, parent, parent spouse/partner, and student spouse) identified as required on a particular FAFSA form completes their own section. If completing the form online, they must log in with their FSA ID

			(which is associated with and used to verify that person's identity) to access and complete their section. Only the student and other contributors to a student's FAFSA form can access their information on StudentAid.gov.
	79.d	Fourth, any social security disability income (SSDI) should not be included in the calculation of EFC. SSDI provides monthly income support to citizens that are unable to work as a result of a prolonged or disabling medical condition. Families that receive SSDI regardless of whether the other spouse works already incur a high amount of medical expenses that are not calculated into EFC.	79.d) Thank you for your comment. The Department of Education implemented the Student Aid Index (SAI) calculation in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.
	79.e	Lastly, any income received for a parent that is totally and permanently disabled should not be included in the calculation of EFC. For example, if the parent receives a housing allowance or a pension due to total and permanent disability, that should be subtracted from the EFC because the parent clearly was employed at some point in time but has been determined by an SSA Administrative Law Judge that they can longer work and the income that they receive should be solely used for their maintenance and care.	79.e) Thank you for your comment. The Department of Education implemented the Student Aid Index (SAI) calculation in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.
0083	80	Would like to see housing question added back to FAFSA. Housing plays a key component to ensure we adequately award our students	80) Refer to response for comment number <u>1</u> .
0084	81	It is vitally important for parent to be able to still communicate whether they have one two or three children in college simultaneously. Otherwise each school will assume they have an expectation of the same available parental dollars going to multiple schools.	81) This is question 10 for students and question 35 for parents.
0085	82.a	The biggest issue I see is the small business exclusion from assets. Small businesses and family farms incur so much debt and much of it is tied up in assets. While the business may have a net worth of a half a million dollars, they can't sell a single asset they have to pay for their student's attendance at college as without that \$100,000 tractor that is paid off, they can't farm. A local copy/printing business can have \$100,000 in copiers and equipment but can't sell those to send their child to college or they won't have a business. Most small businesses have all of their money tied up in their equipment so it is not liquefiable which in turn shouldn't throw them out of federal funding for their children.	82.a) Thank you for your comment.
	82.b	Section 4 is worded strangely. Why is it first year (freshman), second year (sophomore), other college undergraduate and graduate? I know freshman typically get less in funding, but why are sophomores in their own category?	82.b) Thank you for your comment. These response options allow for the calculation of estimated loan eligibility, which is communicated to applicants on the FAFSA Submission Summary.
	82.c	Section 5-Why is orphan, ward of the court and foster separate questions? They were combined.	82.c) Thank you for your comment. These individual response options to the Student Personal Circumstances question allow the

			Department of Education (and schools, if they so choose) to customize messaging based on the criteria met. For example, those applicants who indicate they are/were in foster care are provided with information on the FAFSA Submission Summary about benefits for which they may be eligible (such as Chafee Benefits).
	82.d	Sections 10 and 35 (number in college) will no longer affect the formula from my understanding. If this is true, why are we asking this? If it is for research, we should again put that statement "The answers to these questions do not affect aid eligibility and will not be used in any aid calculations. They will be used for research purposes only" OR completely delete/move to the end of the FAFSA as the questions were in the 23-24 FAFSA.	82.d) Refer to response for comment number 31.b .
	82.e	Why was the housing option deleted? Colleges use this information for calculating the cost of attendance. Students do as well. If they must fill out additional it increases the odds of them not going. I see this every single day.	82.e) Refer to response for comment number 1 .
	82.f	Next, section 11 and 12 are for research purposes. It is not necessary. If it isn't required and you are trying to shorten the FAFSA, these should be removed.	82.f) Refer to response for comment number 73.c .
	82.g	Section 13-Why is there the option for neither US citizen or Eligible non-citizen/ If you aren't eligible, why would you fill it out?	82.g) Thank you for your comment. These students should still complete the FAFSA form as they may be eligible for state or institutional aid.
	82.h	Section 15 - In the past this question helped the colleges in determining first generation. The way it is stated, it won't answer that! It does not align with the federal definition of first generation, so it won't answer that question.. This question should have the statement "The answers to these questions do not affect aid eligibility and will not be used in any aid calculations. They will be used for research purposes only" as I believe it has no bearing on their eligibility. Could also be removed to actually shorten the FAFSA if not going to ask the question correctly to help the college financial aid office in determining first generation by the federal definition.	82.h) Refer to response for comment 73.d .
	82.i	Section 17-Is how the student receives their high school equivalency important as for as the test they take?	82.i) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.
	82.j	Section 20-Why is amount of scholarships reported to the IRS optional? If it is optional, why is it on the FAFSA if the goal is shortening it?	82.j) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act. However, per those same requirements the response to this

			question is optional.
	82.k	Section 21-Why only ask about child support received? Why not include child support paid?	82.k) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
	82.l	Section 22-As addressed above, this question is unfair to many families with small business. How would they even begin to calculate the worth minus depreciation minus debts? People don't often keep this information year to year.	82.l) Refer to response for comment number <u>51.a</u> .
	82.m	Section 33-Why is parent residency important?	82.m) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.
	82.n	Sections 29 and 46-Will the student's spouse have to have an FSA ID to consent to IRS transfer? Will both parents/step-parents have to have an FSA ID? If not, why is there a section for consent on the paper FAFSA for both parents?	82.n) Refer to response for comment number <u>2</u> and comment number <u>28</u> .
0086	83	There are millions of divorced parents. I am a divorced parent and I am concerned that with the way the new FAFSA will allow my ex-spouse to see my income and assets. Even if both parents had different userIDs and used the IRS data exchange, it would still seem quite likely that at some point, the child (and/or each parent) would be able to see the income and assets of the other. This sort of breach of privacy of personally identifiable information (PII) and taxpayer information seems inappropriate. In the past, FAFSA only required the information of the parent that had the most overnights with the child. Please bring that back. Please respond to my comment.	83) Refer to response for comment number <u>28</u> .
0087	84	Please look to see if you can ask a question for parents if they have more than 1 child attending the same college or not. I have 2 at same college and it's a pain submitting 2 applications to you and their in the same household. If this question is asked maybe it can be more time efficient or even information can be saved and reformulated to the next students application. For the new fasfa thats launching.	84) Thank you for your comment. Starting in 2024-25, if a parent is identified as a contributor on a second child's FAFSA form, much of their information from the first child's form will be populated into the second child's form when the parent logs in to the second child's FAFSA form with their FSA ID.
0088	85	Please reconsider removing the Housing Plan question and the Federal Work Study interest question on the upcoming FAFSA. This is valuable information for the school to have, for a variety of reasons. Thank you.	85) Refer to response for comment number <u>1</u> .
0089	86	Question 15 asks only if either parent 'attended college'. This could be interpreted to mean as little as one day. On the 2023-24 FAFSA it asked for each parent separately and specified level 'completed': middle school, HS, college, other/unknown.	86) Thank you for your comment. The text for this question is being revised.

		If those previous details don't matter now, why not just remove the question entirely?	
0090	87.a	Please reinstate the housing question. We need this to calculate cost of attendance.	87.a) Refer to response for comment number <u>1</u> .
	87.b	Please remove the question on the number in college, since this will not be needed for calculating the SAI.	87.b) Refer to response for comment number <u>31.b</u> .
	87.c	The question on College or Career School Plans is not helpful without clarifying if the student is working on an additional undergraduate degree.	87.c) Thank you for your comment. It will be up to schools to determine if the student is working on an additional undergraduate degree.
	87.d	The explanation of who the "Other Parent" is must be made much clearer. Students already want to put in information only on their birth parents and not step parent. They do not understand why we need the tax information of the step parent if they were not married at the time their parent filed taxes.	87.d) Thank you for your comment. This text is being revised.
0091	88	I don't understand why the consideration of multiple dependents in college at the same time is being removed from the aid calculation. This is a significant change for those who do have kids close together in age and will have overlapping college expenses at the same time. Regardless of how much income the parents make, the income cannot be double-allocated to multiple students at the same time. Please consider keeping the question and consideration of multiple students attending within the same school year.	88) Refer to response for comment number <u>40</u> .
0092	89	The Parent/Other Parent phrasing makes it more confusing about who's information to use on the FAFSA in the instance of divorced biological parents. One suggestion for alternative phrasing is Parent and Parent's Spouse/Partner. We already get so many incorrect FAFSAs where a student uses biological parents rather than parent and stepparent, etc.	89) Thank you for your comment. The text is being revised.
0093	90	As we are reviewing our current lived name policy, would it be an option for the application to include two types of names- legal name and lived name?	90) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
0094	91.a	Hello, The 24/25 DRAFT FAFSA has a few areas that may create issues when financial aid professionals are attempting to package and award students. The first item of note is the need for a housing question. I understand minimizing the questions asked to students. However, not asking this question will force aid administrators to make an assumption about housing location if we want to award students early in the process.	91.a) Refer to response for comment number <u>1</u> .
	91.b	The second item of note is the lack of an FWS question. We generally offer FWS first to students who mark "yes" to this question. Removing the question will make offering FWS on the front end difficult. Placing FWS on a student's initial award helped students understand aid/work options. We will, of course, reach out to these students; however, one more email or interaction request to respond to may not be noticed. Having to request FWS later in the process places an additional hurdle for our lower-income	91.b) Refer to response for comment number <u>60.b</u> .

		students.	
	91.c	<p>Lastly, I work in a rural area. I believe that asking the transgender question may turn off some parents that are helping their students. Many parents in this area question the value of college and may make assumptions about why that question is on the FAFSA. I have seen parents stop completing the FAFSA with the high school student due to less invasive questions than that. It is a very hot topic, and this will likely be received poorly by parents already skeptical about the college experience.</p> <p>Thank you for your time.</p>	91.c) Thank you for your comment. The Department of Education has revised the demographic questions.
0095	92	<p>In the income tax questions the student, spouse, parents, and other parent if needed, are asked if they submitted a Schedule A,B,D,E,F,or H. I assume that this is to identify applicants not eligible for the "Applicants Exempt frpm Asset Reporting" - the replacement for the old Simplified Needs Formula. But In the case of Schedule B, Interest and Dividends, it is a required schedule only if each exceeds \$1,500, but many tax filers will list them on Schedule B even if under the threshold, and some tax preparation software will list them automatically on Schedule B even if only a small amount.</p> <p>So the question for Schedule B should be "were you required to file Schedule B?" to differentiate between those who had to file this Schedule and those who did but were not required to do so..</p> <p>And on FAFSA on the web will the importation of this info from the IRS be able to differentiate between required vs non-required by the dollar amount?</p> <p>Otherwise, a low income family with just a few dollars of interest or dividends could be prevented from benefiting from the special formula if they used Schedule B when not required.</p>	92) Thank you for your comment. The Department of Education implemented this change in accordance with the FUTURE Act.
0096	93	<p>If I understand correctly, the dependent student and parent are going to have to access the online FAFSA individually and separately, rather than all in one process.</p> <p>Then if the parents are married but filed taxes separately, or the independent student is married but did not file jointly with the spouse, each of them also has to do a portion of the FAFSA on their own rather than while the student is signed on. That sounds very inefficient.</p> <p>Further, it appears that the parents will no longer be able to access the FAFSA with student identifiers which was simple and seemed to work very well this past year.</p>	93) Thank you for your comment.
0097	94	<p>The new formula starts with AGI and no longer adds back pre-tax retirement contributions, which is a sensible change. However, it penalizes people that save via an employer Roth 401k or Roth IRA because there is nowhere to deduct those contributions. Please consider allowing a way for people that save via after-tax vehicles for retirement a place to enter those contributions. It is difficult for families to save for retirement and pay for college when the FAFSA counts retirement contributions as available income to spend on college.</p>	94) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
0098	95	<p>The following point below is going to be a BIG barrier for the students who chose to print a signature page for parent (instead of create another FSA ID for parent..... many of our ELL students). I would guess we have at least 15 every year who print the parent signature form.....</p> <p>Changes for 2024-25 include the following:</p> <ul style="list-style-type: none"> •Each role (student, parent, other parent, and student spouse) identified as required on a particular 	95) Thank you for your comment.

		FAFSA form will complete their own section. If completing the form online, the student and contributor (parent, other parent, and student spouse) must log in with their FSA ID to access and complete their section.	
0099	96	<p>The old EFC was supposed to represent the amount that the family could be expected to contribute for education based on their financials. If there was more than one student that amount was divided among each student. An EFC of 30,000 for a single student family would become about 15,000 for each student in a two student family, 10,000 per student in a three student family, etc.</p> <p>But the new Student Aid Index makes no such allowance so now the family is expected to be able to afford twice as much if they have two students, three times as much if there are three students.</p> <p>As an example, I ran the numbers for a family with three students that for 2023-2024 each had an EFC of about \$10,000, or \$30,000 in total. Now for 2024-2025 each student will have an SAI of about \$30,000 which means a total contribution of about \$90,000. That almost equals their total annual income and seems unreasonable.</p>	96) Refer to response for comment number <u>40</u> .
0100	97	<p>Questions 18 and 36 ask if the student/parent have received any of nine federal need-based benefits. If yes to any then applicants will be allowed to skip answering asset questions per Section 479 of the FAFSA Simplification ACT. One of those questions is the free or reduced price lunch program. Would this also include students who participated in the Community Eligibility Program? These students were not means-tested but qualified for CEP due to attending a high-need K-12 district or high school. So, by default, they would mark they participated in F/R and would be able to skip the asset questions. I'm not sure if this is the intent of Section 479.</p>	97) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
0101	98	<p>I am concerned about the removal of the provision that families with multiple children in college can have that considered in their EFC/SAI; I was the youngest of three children and would not have been able to go to college had I not qualified for a Pell grant since I had two older siblings in college at the same time. Recognizing when a family needs to pay for college expenses for multiple children, and allowing them additional aid eligibility as a result, is crucial for medium-to-low income students and families. My college degree completely changed my life, and it would not have been possible without receiving a Pell grant thanks to the consideration of my two siblings in college and my mom's inability to pay anything at all for my postsecondary education.</p>	98) Refer to response for comment number <u>40</u> .
0102	99.a	<p>The removal of the housing questions on the FAFSA will cause burden for students as they will have to complete additional institutional documentation in order for packaging to be done. The first component of determining federal financial aid is cost of attendance (COA). Housing is a key component of COA and therefore, is critical to be included on the FAFSA.</p>	99.a) Refer to response for comment number <u>1</u> .
	99.b	<p>Additionally, the removal of the work study question, especially since the funding is limited on campuses, will make it extremely difficult to determine which students to award. Thank you for your consideration</p>	99.b) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.

0103	100	<p>Please INCLUDE the Housing question on the 24-25 FAFSA.</p> <p>Rationale: As NASFAA noted to ED in early February, housing information is vital for schools in constructing a cost of attendance. We remind the Department that the process of determining a student's financial aid package involves much more than just calculating Pell Grant eligibility and a Student Aid Index. The cost of attendance is a necessary component of student aid eligibility and it cannot be constructed accurately without knowing a student's housing choice. Removing the housing choice question from the FAFSA both defeats the purpose and goes against Congress' intent for FAFSA simplification.</p>	100) Refer to response for comment number <u>1</u> .
0104	101.a	<p>24-25 Draft FAFSA Feedback</p> <p>Consent to Retrieve and Disclose Federal Tax information This section is very dense yet important. Adding a section that provides a high-level overview/summary of what contributors are agreeing to would increase understanding.</p>	101) Thank you for your comment. 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®) form.
	101.b	<p>Section 1: Student Identify Information The section for the student to enter their Individual Taxpayer Identification Number (ITIN) creates some confusion on eligibility to complete the FAFSA without an SSN but with an ITIN. It is confusing because as of right now if you have an ITIN you don't have a SSN and would be ineligible to fill out the FAFSA and if you have a SSN you wouldn't have an ITIN. Why is are they both being included for the student whose FAFSA this is?</p>	101.b) Thank you for your comment. 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®) form.
	101.c	<p>Section 4: Student College or Career School Plans When the student begins the 2024-25 school year, what will their college grade level be? This question needs further clarification for students with Associate degrees so they do not select college graduation when they should select another option. This question should also clarify how grade level should be calculated (i.e., credits)</p>	101.c) Thank you for your comment. Applicants with an associate degree need to confirm what grade level they should select with their school. The Department of Education is updating the text for the college graduate option to clarify this refers to applicants seeking a graduate/professional degree.
	101.d	<p>Section 7: Student Unusual Circumstances The title of this section and the question are not very student-centered. For students navigating this section on their own, they may not recognize or identify their personal circumstances as unusual. We</p>	101.d) Refer to response for comment <u>43</u> .

		think the wording should be as distinct as possible.	
101.e	Section 11: Student Demographic Information	The help text would be clearer if it fully stated “financial aid eligibility” as opposed to just “aid eligibility”	101.e) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
101.f	Section 14: Student State of Legal Residence	Help text or notes should explain how students should answer this question if they were born in the state they are currently a resident of.	101.f) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
101.g	Section 15: Parent Education Status	Help text or notes should explain how the FAFSA defines college. Important points to clarify, how much college counts as attending and whether college in another country counts.	101.g) Refer to response for comment 73.d.
101.h	Section 16: Parent Killed in Line of Duty	Help text or notes should explain why this question is being asked. Without further explanation, students may not know they could be eligible for additional financial aid based on their response	101.h) Thank you for your comment. 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®).
101.i	Section 23: Colleges	Housing choices for each college should be listed for students to receive accurate financial aid offers.	101.i) Refer to response for comment number 1.
101.j	Section 20/28/38/45: Student/Spouse/Parent/Other Parent 2022 Tax Return Information	Income earned from work refers to the wrong line on IRS Form 1040. Multiple line 1s need to be identified, such as 1a,1b,1c,1g, and 1h. Income tax paid refers to the wrong line on IRS Form 1040. This question should refer to IRS Form 1040-line 22 Did the student receive the earned income tax credit (EITC)? - Refers to the wrong line on IRS Form 1040. The help text should say line 27.	101.j) Refer to response for comment number 13.a.
101.k	Section 37: Parent Tax Filing Status	In the help text, it would be useful to include examples of when parents would select this option: "The parent did not and will not file a U.S. tax return for reasons other than low income." (anticipate questions from parents/families about this)	101.k) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
101.l	24-25 SAR/FAFSA Submission Summary	The layout of this document is confusing, and it can be difficult to understand the next steps. Specifically, the comments section does not adequately highlight the importance of this section in ensuring the FAFSA is complete.	101.l) Thank you for your comment. 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®).
	101.m	Bolding of former responses can be difficult to follow as they don't follow a logical placement. They seem to be fit wherever there might be spaced based on question length. Standardizing placement would allow for a document that is easier to read.	101.m) Thank you for your comment. 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®).
0105	102	<p>In the past, all voluntary contributions to any pre-tax retirement plans were added back into the available income when computing the EFC.</p> <p>But now there appears to be an inequity in the way different types of pre-tax retirement contributions are treated in the new SAI formula.</p> <p>Type 1: Pre-tax IRA contributions are deducted on the 1040 to reduce the AGI, but they are then collected on the FAFSA questions and added back to the available income.</p> <p>Type 2: Pre-tax contributions to 401(k) etc. have already reduced the wages and thus also reduced the AGI. But these seem to no longer be collected and added back to the available income.</p> <p>Thus, two individuals may have similar earnings, and similar AGIs, but if one uses an IRA and the other uses a 401(k) of the same amount they will end up with different available incomes for the formula, The individual using the 401(k) will have a lower SAI (and a very significantly lower SAI if they take the maximum allowable pre-tax 401(k) contribution).</p> <p>Why should this be?</p>	102) Thank you for your comment. The Department of Education implemented the new Student Aid Index formulas in accordance with SAI calculation requirements, as defined by the FAFSA Simplification Act.
0106	103	Multiple children in college should still be a factor in the formula for the EFC/SAI. This new FAFSA form hurts hard working families with multiple children in college. As quoted on the current studentaid website, " We recognize that as a parent, your annual ability to pay per child decreases as you have more children enroll in college. So we divide the expected parent contribution portion by the number of children you expect to have in college. This is how much you are expected to contribute." With this new formula on the FAFSA form, it no longer takes multiple children into account and is the complete opposite of this statement. It is inconsistent and worry some. As a working parent of three this is unfair to all hard working families with multiple children. This area of the FAFSA formula should be revisited to include multiple children in college. Thank you.	103) Refer to response for comment number 40 .
0107	104	Consider re-adding the Marital Status Date for both the student and parent, to help us identify: - incorrectly reported tax filing statuses	104) Thank you for your comment. The Department of Education is permitted only to

		- students or parents who would be required to add their spouse's information and income to the FAFSA but didn't	ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act. The existing marital status, tax filing status, and return filing status questions can sufficiently determine when additional information is needed or in conflict.
0108	105	Funds withdrawn from IRA's (Individual Retirement Accounts) for hardship reasons (unemployment, etc.) before age 59 1/2 years should not be counted as income that can be used towards education as this is not regular income. FAFSA should have a mechanism to isolate and remove any such amount	105) Thank you for your comment. The Department of Education implemented the new Student Aid Index formulas in accordance with SAI calculation requirements, as defined by the FAFSA Simplification Act.
0109	106	Number of family members, particularly dependents (children) of the parents should be part of the Student Aid Index calculation as it directly effects ability to pay when 2 or more children are in college at the same time	106) Refer to response for comment number 40 .
0110	107.a	Comments on the 2024-2025 Draft English FAFSA PDF 1. Instructions - The FAFSA instructions on the cover page of the form indicate that some questions are circles and others are squares, and both formats should be completely filled in. The instructions say that applicants should not make a checkmark even though checkmarks are far more common in squares or checkboxes than filled fields. Some of the questions with squares say "Select all the apply," which is likely to lead to checkmarks. We recommend that the form consider consistently using the same format by making all the answer options circles.	107.a) Thank you for your comment. The Department of Education believes this format aligns with current industry design standards and best practices.
	107.b	2. State Deadlines - We recommend that these deadlines be confirmed with each state at the latest possible time to ensure accuracy. Now that there is a delay in the opening of the form, states are adapting their processes. Some states have changed their deadlines recently and others are in the process of doing so. The deadline listed for Ohio, for example, is incorrect. It should be October 1, 2024.	107.b) Thank you for your comment. Please see response 25.b .
	107.c	We also recommend updating these deadlines at least monthly so that students accessing the form online will have the most up-to-date information.	107.c) Thank you for your comment. 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®).
	107.d	Finally, we recommend that the online form include web links for each state's financial aid program so that students can confirm the deadlines themselves in case they change.	107.d) Thank you for your comment. 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®) form.
107.e	3. Consent to Retrieve and Disclose Federal Tax Information – This section needs an introductory sentence that offers context for why all applicants must provide consent for the student to be eligible for federal aid. Currently, it starts with “Under penalty of law,” which can be very intimidating to applicants. We recommend adding an introductory sentence that explains that all parties - students, parents, and spouses - will need to grant consent for their tax information to be transferred to the form and that doing so will reduce errors and simplify the process of applying for financial aid.		107.e) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
107.f	4. Student Identity Information – The student information section asks for a student ITIN if they don't have a social security number (SSN). We recommend that this question be broken into two-parts: If you do not have an SSN, do you have an ITIN? If yes, fill in the number. If no, move on to the next section.		107.f) Thank you for your comment. The Department of Education is in the process of updating this item or function to better assist customers and improve the accuracy of information collected and submitted on the Free Application for Federal Student Aid (FAFSA®).
107.g	5. Mobile Phone Number – Unless FSA needs to have applicants' mobile phone numbers so that they can text, we recommend changing this question to “Phone Number.”		107.g) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
107.h	6. Skip Instructions – We recommend that the form more clearly instruct applicants on pages 6 and 7 that they may be able to skip some questions. The Student Household Size vs. Parent Household Size questions may be confusing for traditional, dependent students.		107.h) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
107.i	7. Student College or Career Plans – o We recommend that the question about college grade level revert to the options offered in the previous FAFSA or clarify how grade level should be calculated (i.e., credits). It is often critical for a college to know if a student is a first year never attended or a student who transferred and is still a freshman based on credits earned. Colleges employ different packaging guidelines for transfer and incoming students. This question also needs further clarification for students with an associate's degree so that they do not select college graduation when they should select another option.		107.i) Thank you for your comment. The grade level question is used to set federal direct loan limits. The student should select the response reflective of the work completed towards the degree/certificate and is additionally encouraged to seek clarification from their school. The college graduate response text will be revised.
107.j	o We also recommend that “Other undergraduate (junior or senior) say “junior year and beyond,” as many students take 5 or 6 years to obtain a degree.		107.j) Thank you for your comment. The text for this question will be revised.

107.k	o Finally, we recommend changing the question about whether a student has a B.A. to: When the student begins the 2024-25 school year, will they have their first a bachelor's degree?	107.k) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
107.l	8. Family Size – We recommend adding instructions to locate the number of exemptions claimed on the 2022 tax return and answer the family size question if that number is no longer accurate. These instructions should provide examples of instances where family size may have changed, such as divorce, death, marriage, births, older siblings no longer in the home, divorce decrees assigning options to claim children, etc.	107.l) Thank you for your comment. The Department of Education believes the instructions provided for answering the family size question on the PDF FAFSA are clear. Note: these differ from help provided to someone completing a FAFSA form online.
107.m	9. Student Demographic Information –These questions may appear threatening to students and make them afraid to answer because they think their college will use the information in a harmful way. o We recommend adding a sentence at the beginning of this section that says that the responses to these questions will not be forwarded to any of the colleges listed on the form.	107.m) Thank you for your comment. The text for this question will be revised.
107.n	o We also suggest placing all the race categories and subcategories in alphabetical order.	107.n) Refer to response for comment 43 .
107.o	o The help text would be clearer if it fully stated “financial aid eligibility” as opposed to just “aid eligibility.”	107.o) Refer to response for comment 43 .
107.p	10. Student State of Legal Residence – The help text or notes should explain how students should answer this question if they were born in the state in which they currently reside.	107.p) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
107.q	11. Parent Education Status – o This question is vague and provides no concrete information about how applicants should define “attended college.” Many states use different definitions for first generation student and the previous wording of the question makes it impossible to distinguish between attended (for any length of time) or graduated from college. We recommend clarifying what it means to attend college.	107.q) Refer to response for comment 73.d .
107.r	o We also recommend including the following sentence at the top of this section: "The answers to these questions do not affect aid eligibility and will not be used in any aid calculations. They will be used for research purposes only."	107.r) No change. Some schools and states use this question to determine eligibility for certain types of aid.
107.s	12. Parent Killed in Line of Duty – The help text or notes should explain why this question is being asked. Without further explanation, students may not know they could be eligible for additional financial aid based on their response	107.s) Refer to response for comment number 101.h .
107.t	13. Student High School Information – This section asks about a “State-recognized high school equivalent” and offers a list of acronyms as response options. We recommend deleting the list of high school equivalency tests in the interest of shortening the form.	107.t) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(ii)(X)(bb).
107.u	14. Student and Parent Tax Filing Sections – o “Income earned from work” refers to Form 1040 line 1, which has several subquestions. We believe the	107.u) Refer to response for comment number 13.a .

		FAFSA form should read "Line 1a."	
107.v	o	"Income tax paid" references "Form 1040, line 25d," which is the total of taxes withheld. That is not what this question is asking. Total tax paid should reference line 24 on the 1040.	107.v) Refer to response for comment number 13.a.
107.w	o	The Earned Income Tax Credit questions references "line 27a." There is no line 27a on the 1040. The EITC is captured on "line 27."	107.w) Refer to response for comment number 13.a.
107.x		15. Annual Child Support Received for Students and Parent Sections – This question includes instructions that the amounts listed should be for the "last complete calendar year." We understand this question was moved to the asset section of the FAFSA and that assets are to be reported as of the day the form is completed. The instructions mean that depending on when a student completes the 2024-2025 FAFSA, they could be providing child support received for up to three different calendar years: 2022, 2023, 2024. For consistency, the question should align with the tax year income being reported. We recommend changing "last complete calendar year" to the 2022 calendar year.	107.x) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
107.y		16. Assets for Student and Parent Sections – We suggest rewording the question from "Current net worth of businesses and investment farms" to "Current net worth of businesses and farms." We also recommend clarifying in the instructions that this figure should include investment or family farms and that the net value of the home on the family farm should not be included in the total reported.	107.y) Thank you for your comment. 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®) form.
107.z		17. Colleges – o For packaging purposes, colleges need to know the living plans for students so that they can allocate the appropriate cost of attendance. We recommend that the living plans subpart of this question be added back in. Without this instruction, colleges are going to have to contact every student to secure their housing plans, which will impose an unnecessary administrative burden on financial aid administrators and students.	107.z) Refer to response for comment number 1.
107.aa	o	We understood that students would be able to list 20 colleges on the new FAFSA and recommend increasing the number of options, if that is the case.	107.aa) Applicants may list up to 20 schools at a time when filling out the FAFSA form online.
107.ab		18. Consent and Signature in Student & Parent Sections – o This section is very dense yet important. We recommend adding a short section that provides a high-level overview/summary of what contributors are agreeing to to increase understanding.	107.ab) Thank you for your comment.
107.ac	o	The small circle required to give consent to transfer federal tax information from the IRS is not located in a position that will be seen by those signing the form. We recommend moving the bubble closer to the date or above the signature so that it will not be overlooked when contributors are signing the form.	107.ac) Thank you for your comment. 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®).
107.ad	o There should be instructions for parents who do not have an SSN.		107.ad) Thank you for your comment. 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®).
107.ae	19. Foreign Languages – The authorizing legislation indicates that the FAFSA will be expanded to the 11 most common languages spoken by English language learners and their parents. We recommend stating on the form the options for getting assistance for applicants and family members who do not read English or Spanish.		107.ae) This change will be made as requested.
107.af	20. Parent Tax Filing Status – In the help text, it would be useful to include examples of when parents would select this option: "The parent did not and will not file a U.S. tax return for reasons other than low income." We anticipate receiving questions from parents/families about this issue.		107.af) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
107.ag	21. Notes on Which Parent Should Include Information – We recommend adding instructions for which parent should include information if their parents provide an equal amount of financial support.		107.ag) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
107.ah	Comments on the FSA ID Process 1. Process for Contributors Without an SSN – We recommend making the process for obtaining an FSA ID for those without an SSN public as quickly as possible so families in this situation can begin to set up the ID.		107.ah) Thank you for your comment.
107.ai	We also recommend including instructions on the FSA ID webpages for how to file a FAFSA if an applicant is unable to secure an FSA ID. We assume the family will need to file the paper FAFSA to grant consent in these instances and recommend publicizing clear instructions for families in that circumstance.		107.ai) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
107.aj	2. Email Addresses – We recommend noting in the instructions for getting an FSA ID that contributors will need an email address to get into the FAFSA. This approach will facilitate the process of completing the form, which requires applicants to invite contributors via email. Without an email address, contributors will not be able to receive the invitation to contribute information to the FAFSA.		107.aj) Thank you for your comment. There will be an upcoming change made to the FSA ID process that will require all users to provide an email address.
107.ak	We also urge you to continue to offer alternative options for verifying the FSA ID: text, authentication app, and backup codes.		107.ak) Thank you for your comment.
107.al	3. Concern about December Deadline – It is important for practitioners to have the FAFSA release date as soon as possible. High school seniors will have winter breaks away from school supports and many people		107.al) Thank you for your comment. The updates that are included in 24-25 FAFSA

		have time off, especially in later December. Backwards planning for programming may need to be adjusted to ensure that there is time devoted to FAFSA support in December.	application release as part of the FAFSA Simplification Act and the FUTURE Act take a considerable amount of input and effort by many parties to define the requirements, ensure the accuracy of the functionality, develop the system, test the system, resolve any issues, apply security protocols, and clear the application with OMB. Because of the extensive amount of time needed to complete all these activities, the date on which the application will be made available is the earliest that is possible. We apologize for any inconvenience.
	107.am	Comments on the Draft FAFSA Submission Summary, 1. Layout – The layout of this document is confusing, and it might be difficult for applicants to understand the next steps.	107.am) Thank you for your comment.
	107.an	Specifically, the comments section does not adequately underscore the importance of this section in ensuring the FAFSA is complete. It can be difficult to follow the bolding of responses because they are above the questions instead of where the answers would actually be placed. Standardizing the placement of answers or showing a completed document would make the form clearer and easier to read.	107.an) Thank you for your comment. The Department of Education gathered a considerable amount of input from many parties and usability studies and used current industry design standards and best practices to develop the FAFSA Submission Summary. The FAFSA Submission Summary is a correctable document and therefore blank answers fields are provided to allow the applicant to update the form.
	107.ao	2. Loan Information – Page 3 would be a good opportunity to briefly remind students of the difference between subsidized and unsubsidized loans. These distinctions are confusing and can be hard for students to remember. It would make sense to have this information clearly described on the page where students are looking at their current student loan balances.	107.ao) Thank you for your comment. 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®).
	107.ap	Comments on the Online User Experience 1. SSN Matching – We recommend adding instructions about which information will be used to import tax income information from the IRS. If that information is the applicant or contributor’s SSN, we recommend adding text that suggests applicants or contributors review their tax form to make sure the same SSN that was used on that form was used to create the FSA ID.	107.ap) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.

		Guidance should be offered about what to do when they don't match.	
	107.aq	2. Develop Additional Messaging for Incomplete Forms – If one section of the form has been completed, but a contributor did not complete their section, the applicant should be notified immediately and again after 7 and 14 days, at a minimum. Those messages should state that a contributor has not completed their section and they should encourage the applicant to contact the contributor. A generic message that an applicant's FAFSA is incomplete is inadequate. We also recommend that parents receive a message if they completed their section, but the student has not completed theirs.	107.aq) Thank you for your comment. The Department of Education is in the process of updating this item or function to better assist customers and improve the accuracy of information collected and submitted on the Free Application for Federal Student Aid (FAFSA®).
	107.ar	Comments on Mailing the Paper Form – With the expansion of the form from 4 to 14 pages, there should be instructions about how best to place the form in the U.S. mail. Most people who print the pdf form will print it single and not double-sided. Will 14 folded pages fit in a standard envelope that can be mailed with one stamp? If not, the form should include instructions about the size of envelope and the amount of postage required to mail a 14-page form	107.ar) This change will be made as requested.
0111	108	The theory regarding paying for college seems to be it should be a combination of past earnings (savings/assets), current earnings, and future earnings (loans). However most of the emphasis in the EFC and now the SAI formula seems to be that current earnings are of significant importance, given that up to 47% of the adjusted earnings of the parent(s) are considered to be “available” to pay for college. That’s why not accounting for more than one child in college at the same time doesn’t seem to make sense. Even if the SAI is merely an “index” and technically not an amount a family is expected to be able to afford for college in a given year, it’s still a number that financial aid is based on. So if a family has two or more students in college at the same time, seemingly that should be taken into consideration, since otherwise the SAI number is misleading to what a family can truly afford in that given year.	108) Refer to response for comment number <u>40</u> .
0112	109	I am greatly concerned about the housing question being removed from the FAFSA. From a school perspective, we are being asked to provide students with greater detail regarding cost of attendance which includes providing separate costs for housing, meals, personal expenses, etc. To provide the detail required by legislation, schools need to be able to identify a students living arrangements. Removing this question will require schools to collect this information on a separate application or to make assumptions leading to inaccurate costs. Removal of this one question may be a minor FAFSA simplification for the student up front, but it creates a burden to the student and the school in having to collect this information elsewhere.	109) Refer to response for comment number <u>1</u> .
0113	110	PLEASE PLEASE PLEASE INCLUDE the housing and work study question on the 2024-2025 FAFSA. This is vital for schools to be able to package and award students accordingly. Since many schools use this field to help with the Cost of Attendance schools we will have to use other ways to be able to award students which could delay their eligibility for need based aid. This means we will have to rely on other departments and information they receive which is NOT AS timely or as accurate as a FAFSA. We understand that you want to make things better for those completing the FAFSA; however, not including this question makes things MUCH WORSE for us having to deal with those who are completing a FAFSA. With the many changes from EFC to SAI we are already going to have to deal with students who are now	110) Refer to response for comment number <u>1</u> .

		NOT ELIGIBLE for Pell can we please make this one thing schools DO NOT have contend with? We graciously as you to please reconsider as we are all in this together! Thanks in advanced!	
0114	111	Removal of housing question, will create significant and frustrating barriers for students. Please add that question back in order to expedite packaging for students, especially those who are comparing schools...imagining incoming students trying to compare COAs and offers from multiple schools, all attempting to determine the student's housing plans. If this is not collected on the FAFSA, schools will have to implement another application/form to gather this information one by one for each student.....creating delays and barriers for getting aid awarded in a timely and accurate manner.	111) Refer to response for comment number <u>1</u> .
0115	112.a	The removal of the multiple children in college calculation is devastating to middle class families.	112.a) Refer to response for comment number <u>40</u> .
	112.b	Also, pushing back the opening of the FAFSA to December will make it impossible for students who apply Early Decision or Early Action to get financial aid packages containing accurate federal aid information.	112.b) Refer to response for comment number <u>107.a</u> .
0116	113.a	Please do not remove the FAFSA questions concerning work-study and housing. This data helps our 26 public universities in Georgia.	113.a) Refer to response for comment number <u>1</u> .
	113.b	The housing question all provides students with a more accurate cost of attendance.	113.b) Refer to response for comment number <u>1</u> .
0117	114	This is completely unfair to families of multiple children in college. People start saving for college 18 years before their children start college. Changing this now only punishes the middle class. If you are wealthy, this does not impact you. If you are low income, this does not impact you. Only middle income. Way to go.	114) Refer to response for comment number <u>40</u> .
0118	115	Please add the housing question back to the FAFSA form. By considering things like residential status, location, food sources, and perhaps transportation/ proximity to campus, the need for financial assistance will vary, and in most ways increase. By omitting this question, the burden to provide and verify this information will lie with the applicant and receiving institution. Essentially, not providing the information in advance will create more work and time to generate a financial assistance decision.	115) Refer to response for comment number <u>1</u> .
0119	116	Please do not eliminate housing options. This is important to the budgeting (budgets differ depending where the student lives) and packaging processes. If eliminated, how would the FAA collect this information?	116) Refer to response for comment number <u>1</u> .
0120	117.a	Institutions are required to have Cost of Attendances that differentiate between living on campus, with parent or off campus not with parent. If the question that ask where will a student live is removed from the FAFSA, this will cause issues with institutions obtaining this required information. Institutions should not have to result to requiring an additional application to obtain this information which will cause undue hardship for our students and parents.	117.a) Refer to response for comment number <u>1</u> .
	117.b	Also the question regarding a student's interest in Federal Workstudy is very helpful to institutions in awarding the federal workstudy funding from our annual allocations from the Department of Education. Delays with the awarding of financial aid funds are already going to take place due to the late start of the 2024-2025 FAFSA cycle. Removing the questions on where a student will live and if they are interested in	117.b) Refer to response for comment number <u>1</u> .

		federal workstudy will cause more delays in the financial aid awarding process and this will hurt our students even more!	
0121	118	Please add housing options so that financial aid offices are not compelled to gather this information directly from students before packaging their federal aid, creating another barrier to entry. A student's housing status has a significant impact on cost of attendance, need analysis, and therefore packaging. Once again, the changes being considered will force the financial aid to delay packaging students as we are required to collect additional information. Students and families will cast blame to the financial aid office. We support making the FAFSA application simpler but do not impose greater burden on the financial aid offices to do so and hold us accountable. To me, this is the equivalent of hidden prerequisites: "You only need 90 credits to earn your Associate's degree, but in order to meet graduation requirements, you must take these classes to get to the class that is required to graduate"	118) Refer to response for comment number 1 .
0122	119	Please reconsider the removal of the housing and work-study questions from the 2024-2025 FAFSA. The housing question is integral to the selection of COA for several schools. Without this information on the FAFSA, institutions will need to add an additional requirement to gain that information. Doing so is an unfortunate roadblock for students that can very easily be avoided by keeping this question on the FAFSA. It is of my opinion that it is in the best interest of our students to keep these questions on the FAFSA because if it helps our processing then it helps their timely receipt of financial aid.	119) Refer to response for comment number 1 .
0123	120	PLEASE PLEASE PLEASE INCLUDE the housing and work study question on the 2024-2025 FAFSA. This is vital for schools to be able to package and award students accordingly. Since many schools use this field to help with the Cost of Attendance schools we will have to use other ways to be able to award students which could delay their eligibility for need based aid. This means we will have to rely on other departments and information they receive which is NOT AS timely or as accurate as a FAFSA. We understand that you want to make things better for those completing the FAFSA; however, not including this question makes things MUCH WORSE for us having to deal with those who are completing a FAFSA. With the many changes from EFC to SAI we are already going to have to deal with students who are now NOT ELIGIBLE for Pell can we please make this one thing schools DO NOT have contend with? We graciously as you to please reconsider as we are all in this together! Thanks in advanced!	120) Refer to response for comment number 1 .
0124	121.a	I am thoroughly disappointed by the so-called "FAFSA Simplification" for 2024-2025. The paper FAFSA has doubled in length.	121.a) Thank you for your comment.
	121.b	The process for student and parent input and signatures for the online application has become cumbersome and much more complicated.	121.b) Thank you for your comment.
	121.c	The changes in who is the reporting parent may well force current students to change schools or drop out because their anticipated cost has suddenly gone way up vs what they paid when they started college.	121.c) Thank you for your comment.
	121.d	Similarly, the change in how families with multiple students are treated for the Student Aid Index is also likely to cause dropouts because the SAI per student can become totally unaffordable.	121.d) Refer to response for comment number 40 .

		If the intent to “simplify” was to make it easier to complete and therefore increase the number of students who apply and ultimately attend college, these changes will have the opposite effect.	
0125	122.a	I am greatly concerned by the omission of the housing question. This is necessary for determining the student's aid package and should be included on the FAFSA rather than forcing the school to collect the information.	122.a) Refer to response for comment number 1 .
	122.b	Additionally, the parent education question should be returned to its previous form. The change in this question essentially redefines what a first generation college student is. Very few students will qualify as first gen if it simply means one of their parents ever "attended" college. We use this response in determining award for certain state grants and our TRO SSS programs use it for determining eligibility.	122.b) Refer to response for comment number 73.d .
0126	123	This is in regards to Question 11 asking for the student's gender and whether they are transgender or not. I believe that this question poses a very substantial risk to the Queer and Transgender community. While there is a potential benefit to this community in being able to gather information for the distribution of financial aid to this group by the Department of Education, the risk of this personal information being attached to their personal identifiers on the FAFSA such as SSN, Phone number, Home Address, and college choices is very grave. As a Financial Aid Administrator I take serious concern with the Department of Education, and all Title IV participating schools who may receive this information's ability to handle this information securely and in a way that will not harm the students. Our own current White House administration has issued guidance regarding the collection of Gender Identity questions, and has specifically mentions a data breach of these identifiers being used to "target individuals, deny them access to programs or services, or cause other harms." (Pg. 8 of Recommendations on the Best Practices for the Collection of Sexual Orientation and Gender Identity on Federal Statistical Surveys, White House). It is not news that the political environment surrounding Transgender rights and the protections of Queer people is very unstable. Our supreme court has been weighing in on issues involving the protection of LGBT issues recently, which increases the instability of the rights and protections of this group. Having a permanent database held by the Federal government which can identify someone, including minors, as being Transgender or Queer could be used by an unsympathetic or malicious political party, group or individuals in a way with regrettable consequences. Likewise, some school administrators who are personally homophobic or Transphobic would have easy access to this information, and could share or use it in a way to harm or disrupt the life of those students. It is understandable that these security concerns already exist for the myriad of personal information that the FAFSA already collects, however this minority group could be due more harm than good by the leak or more importantly, the sheer access of this information.	123) Refer to response for comment number 91.c .
0127	124.a	The Simplified FAFSA is welcomed but based on the draft, it looks as much work is still to be done. There are several items upon first review that are concerning. First, taxes paid from the 2022 federal tax return is line 22. Or use line 24 total tax which is fair to not include any of the taxes paid but line 25d is taxes withheld.	124.a) Refer to response for comment number 13.a .
	124.b	My second concern are questions 11 and 12. These questions are optional; however, they could cause the student to be discriminated against in the awarding of financial aid and/or scholarships. These questions	124.b) Thank you for your comment. The Department of Education implemented this

		open up the student to possible bias and unequal treatment.	change in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.
	124.c	Taxable interest income is not a common occurrence on tax returns. It is not a useful question especially if assets are not verified.	124.c) Thank you for your comment. This question is required either (a) to determine eligibility or aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
	124.d	Parents rarely have excess scholarship/grants included on their tax return. It might be helpful if there is a notation that SCH is the note on line 1 wages that indicates scholarships were included in both the student and parent sections.	124.d) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
	124.e	Work-study question was taken off. Does this mean that work-study is counted against the student in the SAI calculation?	124.e) Refer to response for comment number <u>60.b</u> .
	124.f	The FAFSA could be simplified by taking out questions but not doing a full overhaul of format. This would help the schools and programmers to be ready to implement the changes for 2024-2025. I fear that it's already May 2023 and most financial aid administrators, servicers and programmers have not even seen the FAFSA to comment. I have worked in financial aid for over 20 years. I specialize in verification. While I welcome simplification, I do not see how this will be ready and do not see why some questions were left on versus some questions taken off. Based on verifying thousands of FAFSAs and being involved in the quality assurance program, I feel that the Department of Education needs to open up the FAFSA simplification to the financial aid administrators who have real, hands on experience correcting FAFSAs and reading tax returns. We see daily the impact the questions have on the calculations and what questions are rarely a value more than zero.	124.f) Refer to response for comment number <u>1</u> .
0128	125	<p>Questions 21 and 39 "Enter total amount received in child support for the last complete calendar year" should instead be "Enter total amount received in child support for 2022."</p> <p>The current wording could be interpreted differently depending upon when it is being filled out and could produce totally different responses.</p> <p>If the FAFSA is being filled out in October 2023 the correct answer would obviously be for child support received in 2022, But if it is being done in late December 2023 the applicant might use 2023 income, and if being done in February 2024 the applicant would likely enter the 2023 child support received for the "last complete calendar year".</p> <p>Further, if no child support was received in 2022, but there was some in 2021, the 2021 amount might even be erroneously entered because of the ambiguous language.</p> <p>Since the child support received should presumably be for the same year as is asked for taxable income,</p>	125) Thank you for your comment. This question is worded in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2) (B)(ii)(XIV)(aa).

		the questions for the 2024-2025 FAFSA should specifically ask for child support received in 2022.	
0129	126.a	<p>Thank you for this opportunity to provide comments regarding the new FAFSA application. Three comments will provide some context for you.</p> <p>First, the sex, race, and ethnicity questions are not relevant to eligibility for Federal Student Aid. However, the information may be useful to institutions in identifying students who may be eligible for certain scholarships that apply to a particular demographic. As long as the “prefer not to answer” option is available to respondents and it is clear that answering these questions is not a requirement for completing the FAFSA and receiving Federal Student Aid, this should not be a major impediment to students. However, if it is not clear that the questions do not need to be answered, then the questions should be removed.</p>	<p>126.a) Thank you for your comment. These questions are required by the FAFSA Simplification Act and are for research purposes only.</p> <p>Additionally, the responses to these questions will not be shared on the ISIR.</p>
	126.b	<p>Secondly, while it may be difficult to report the net worth of a family farm or small business, this information has been asked for in prior years. We believe that an option for stating a reason why such information cannot readily be obtained should be included in the form and honored. A checklist of reasonable exclusions could be provided.</p>	<p>126.b) Refer to response for comment number 37.g.</p>
	126.c	<p>Lastly, the requirement to have both parents' signatures is not unreasonable as long as those signatures are required if both parents (stepparents) are living together. If, however, there are extenuating circumstances, i.e., parent serving in the military and stationed elsewhere, there should be a reasonable exclusion to this requirement.</p> <p>Thank you, again, for the opportunity to provide feedback.</p>	<p>126.c) Refer to response for comment number 28.</p>
0130	127	<p>I strongly disagree with the decision to eliminate the sibling discount from the FAFSA. The sibling discount is an important recognition of the financial burden that multiple college enrollments can place on families. Without this discount, it will be much more difficult for families with multiple children to afford college, and will add to the already significant financial strain that many families are facing. I believe that this change will ultimately have a negative impact on access to higher education for many students, and I urge policymakers to reconsider.</p>	<p>127) Refer to response for comment number 40.</p>
0131	128	<p>Counting family farms as assets is a major slap in the face to the hardworking people who literally feed us. They have such a small profit margin as it is and they sustained us during the worst of the pandemic supply chain failures.</p> <p>Additionally, creating this financial barrier for farm children to attend college could devastate agriculture-based universities such as UVM, UNH and UConn once their attendance drops. Please eliminate this part of the bill.</p>	<p>128) Refer to response for comment number 51.a.</p>
0132	129	<p>With the adoption of the FAFSA Simplification Act, we are concerned about the unintended consequences of the changes to family farms and small businesses. The new requirements require that a student report the net worth of their family farm and treat it as an asset in the calculation of the SAI. This causes individuals who have previously been eligible under the original EFC calculation, all of a sudden to be ineligible. These individuals may not have much liquidity and in fact, have assets that far exceed their</p>	<p>129) Refer to response for comment number 51.a.</p>

		<p>actual income.</p> <p>For example, one analysis shows that a dependent student from a family of four with a parental income of \$60,000 and a reported small business or family farm net worth of \$1 million would have an EFC of \$7,626 with the existing needs analysis formula. But under the new formula, the SAI would be \$41,056.</p> <p>If you cannot accommodate an exclusion, we encourage more clarification and guidance on definition of assets and provide opportunities to exclude non-liquid assets such as land, buildings, inputs, inventories, commodities, etc. A family farm should be defined as a farm which also includes the family's primary residence. These exclusions are intended to protect an individual's livelihood from the needs analysis, while at the same time ensuring that large businesses and investment farms are still required to report those assets.</p>	
0133	130.a	The Farm valuation requirement and the requirement to get both parents' signatures will lead to many of our students being unable to complete the FAFSA. This will be particularly difficult for children of divorced parents and those who have been voluntarily or involuntarily abandoned by their parents whether by choice or forced incarceration.	130.a) Thank you for your comment.
	130.b	The information about demographics is invasive and not relevant to a student's eligibility for aid.	130.b) Refer to response for comment number <u>73.c</u> .
	130.c	We are used to processing FAFSAs after January 1st but that doesn't mean that the later availability for the FAFSA would not cause a bottleneck in processing aid. It feels like a one-year delay in implementation to work out these issues would be reasonable.	130.c) Refer to response for comment number <u>107.a</u> l.
0134	131.a	<p>I am writing on behalf of BridgeValley Community and Technical College to share concerns we have with the U.S. Department of Education's (ED's) proposed changes to the Free Application for Federal Student Aid (FAFSA).</p> <p>West Virginia currently has one of the lowest college-going rates in the country, with only 46.4 percent of graduating seniors in the class of 2022 going on to pursue education or training after high school. There are varying factors contributing to this low rate, but one of the biggest hurdles we consistently hear is that students believe higher education is unaffordable. However, with state-sponsored financial aid, which - combined with federal support including the Pell Grant - makes college not just an affordable option but at BridgeValley tuition and fees are paid for by federal or state aid dollars for every student.</p> <p>The first step to unlocking these funds (both federal and state aid from WV) is the FAFSA. The FAFSA has historically been a complicated form that students and their families often need help completing. ED's proposed changes to the form in the spirit of simplification, we fear unintended consequences that will prevent high-need West Virginia students from completing the form - and from accessing money needed for their education.</p>	131.a) Thank you for your comment. These questions are required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2) (B)(ii).

		<p>BridgeValley concerns include the following:</p> <ul style="list-style-type: none"> •New data collected for research only: The proposed FAFSA adds questions about applicants' sex, race, and ethnicity, none of which have any bearing on their eligibility for financial aid. These questions (numbered 11 and 12) are clearly listed as being "used for research purposes only," so we believe they are unnecessary for the intended use of the form and should be removed. 	
	131.b	<ul style="list-style-type: none"> •Addition of farms and small businesses: The FAFSA revisions include the additional requirement that families report the net worth of a family farm or small business. We believe this will make it even more difficult for students in rural areas to pursue college, as it could be too difficult to value farms or small businesses and the exclusion of such assets could result in more middle-income students being eligible for aid. 	131.b) Refer to response for comment number 51.a .
	131.c	<ul style="list-style-type: none"> •Requirement of both parents' signatures: We fully support having income information imported into the FAFSA directly from the IRS and understand the importance of parents giving consent for their IRS information to be released to the Department of Education, but we also understand there are many situations where it is difficult for a student to obtain a parent signature. Having both parents' signatures is a new requirement of the simplified FAFSA and we believe it will impede many of our students from being able to complete the form. <p>West Virginia students already face a number of challenges when it comes to pursuing and accessing education or training after high school. As you know, our state has faced a drug misuse epidemic that has resulted in more of our young people than ever before being raised by someone who isn't a biological parent. These students are often juggling their own jobs and helping to raise their siblings, and accessing all the information they need to determine if they qualify for financial aid for college can be a significant impediment to their futures.</p>	131.c) Refer to response for comment number 28 .
	131.d	I understand that the Department of Education has discussed delaying the launch of the new FAFSA from October 1, 2023 to as late as the end of the year. This tightened timeframe will already make it even more challenging for students looking to pursue money for college next year, so I hope these concerns can be reviewed as urgently as possible.	131.d) Thank you for your comment.
0135	132	Please add in a question about housing plans so that financial aid offices are not compelled to gather this information directly from students before packaging their federal aid, creating another barrier. A student's housing plans are crucial in determining cost of attendance, need analysis, and therefore packaging aid.	132) Refer to response for comment number 1 .
0136	133.a	Please see attached document with California's comments FR Doc # 2023-06169. The California Student Aid Commission (CSAC) appreciates the opportunity to provide public comments to the 2024-25 FAFSA draft. CSAC believes the Better FAFSA will streamline the application process, expand Pell Grant eligibility, and increase access for financial aid access for many more students. Our comments (attached) reflect the impacts to the processing, administration, and data collection of our state Cal Grant Program, as well as other financial aid programs under our purview. Please reach out to us if you have any	133.a) Thank you for your comment. The grade level question is used to set federal direct loan limits.

	<p>questions or need clarification on any of our comments. We also welcome any chance to partner and support the US Department of Education in the implementation of the 2024- 25 FAFSA.</p> <p>Comments on the 2024 25 FAFSA draft pdf version Student College or Career School Plans The field name is Grade Level in College 2024-2025.- On the paper application question 4a/ISIR field 44. The Education Level options are being reduced and consolidated, changing from 0-7 to 1-4. The California Student Aid Commission uses the following identifiers for students to properly calculate their eligibility and amount of award. For the 2023 Academic Year: 0 = First year, never attended college;1 =First year, attended college before ;2 =Second year/Sophomore; 3 =Third year/Junior;4 =Fourth year/Senior; 5 =Fifth year/other undergraduate; 6= First year graduate /professional;7 =Continuing graduate/professional Based on the proposed federal changes for the 2024 Academic Year: 1 = First Year (Freshman);2 = Second Year (Sophomore);3 = Other Undergraduate (Junior or Senior);4 = College Graduate, Professional or Beyond (MBA, M.D., Ph.D., etc.) Grade levels Junior and Senior lumped together as one entry. Impact- CSAC uses reported grade level to determine the number of years of Cal Grant eligibility. With the junior and senior as one entry, CSAC will not be able to make this preliminary determination.</p>	
133.b	<p>Student College or Career School Plans The field name is Degree /Certificate. On the paper application question 27/ISIR field 34. The paper application will ask 2 questions reduced from 9 previous choices. The 9 previous choices based on the question, "What will your grade level be when you begin the 2023-24 school year?" 1 = First bachelor's degree; 2 = Second bachelor's degree; 3 = Associate degree (occupational or technical program); 4 = Associate degree (general education or transfer program); 5 = Certificate or diploma for completing an occupational, technical, or educational program of less than two years; 6 = Certificate or diploma for completing an occupational, technical, or educational program of at least two years; 7 = Teaching Credential Program (non-degree program);8 = Graduate or professional degree; 9 = Other/undecided The new questions are: #4e, "When the student begins the 2024 school year, will they have their first bachelor's degree?" Question 4f, "Will the student be pursuing an initial teaching certification the elementary or secondary level?" Impact- CSAC uses degree objectives 5, 6 and 9 to determine Cal Grant C (certificate program) applicants.</p>	<p>133.b) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act</p>
133.c	<p>Student Personal Circumstances The field name is Child or Other Dependents –On the paper application question #5c/ISIR field 49. The paper application previously asked two questions. The current questions are: #47 Have Children You Support? #48 Have Legal Dependents Other than Children or Spouse? The proposed changes will reduce the two questions to one which is: Q#5c "The student has children or other people (excluding their spouse) who live with the student and receive more than half of their support from the student now and between July2024 and June 30, 2025." Impact-California provides an additional monetary award for Students With Dependent children. Reducing the questions related to dependents without distinguishing children from dependent adults will prevent CSAC from identifying the student parents.</p>	<p>133.c) Thank you for your comment. A student with children or dependents is treated the same in the eligibility determination process. The question was designed with that intention in mind.</p>
133.d	<p>Student School Choices The field name is Housing Plans.-On the paper application questions 98b, 98d, 98f, 98h, have been eliminated. For the 2023 Academic year student College Housing Plans were identified as 1=On Campus; 2= Off Campus; 3=With Parents. The proposed changes will eliminate questions related to</p>	<p>133.d) Refer to response for comment number <u>1</u>.</p>

		Housing Plans. Comments on FR Doc # 2023-06169 -3- 5/12/2023 Impact – CSAC uses the housing plans to determine financial need for Cal Grant eligibility. With wide disparities between with parents and on and off campus, this will present a challenge to determine financial need.	
133.e		Student Residency The field name is State of Legal Residence/Legal Residence Date-On the paper application question #14a/ISIR field 115. The current questions: Q18 “In what state do you live?”; Q19 “Did you become a legal resident of this state before Jan 1, 2018?”; Q20 “If the answer to Q19 is “No”, give month and year you became a legal resident of that state”. The proposed federal change will ask: Q14a Students State of Legal Residence; Q14b Date the student became a legal resident. Impact- The prior question 19 was used to determine initial California residency for the Cal Grant program. CSAC will need to explore options to make a preliminary determination of California residency.	133.e) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
133.f		Student Demographic Information The sex gender, sex transgender, ethnicity and race questions were deleted in the April 28, 2023 ISIR record layout draft. Comment: CSAC seeks this data for research purposes, as well as to identify gaps in outreach to different demographic groups. There is a California state mandate to report on the demographics of Cal Grant recipients, as well as a mandate for universal FAFSA completion for high school seniors. California will request access to this data (unitary or aggregate) should the opportunity present itself.	133.f) Thank you for your comment.
133.g		FSA ID Students with undocumented parents will be required to obtain an FSA ID to sign the FAFSA. Comment: This is already a known barrier for undocumented students in California. Many parents don’t have an email address and may not register for one. Additionally, there is a reluctance to provide information to federal agencies in fear of deportation.	133.g) Refer to response for comment number <u>2</u> .
133.h		Comments on the inconsistencies between the Paper Application and the Institutional Student Information Record (ISIR) File Layout Student Marital Status The field name is Marital Status-On the paper application under question #3/ISIR field #43. The paper application identifies #4 as Separated and #5 as Divorced, however the ISIR file layout identifies #4 as Divorced and #5 as Separated.	133.h) Thank you for your comment. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
133.i		Parent Marital Status The field name is Marital Status-On the paper application question #3/ISIR field #230. The paper application identifies #4 as Separated and #5 as Divorced, however the ISIR file layout identifies #5 as Divorced and #6 as Separated.	133.i) The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
133.j		Student Assets The field name is Net Worth of Business/Investment Farms-On the paper application question #22b/ISIR field #156. The paper application identifies #22b as Current Net Worth of Investments, including Real Estate however, the ISIR file layout identifies #22b as Net Worth of Businesses/Investment Farms. The field name is Net Worth of Current Investments. On the paper application question #22c/ISIR field #157. The paper application identifies #22c as Current Net Worth of Businesses and Investment Farms however, the ISIR file layout identifies 22c as Net Worth of Current Investments.	133.j) The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.
133.k		Parent Assets The field name is Net Worth of Business/Investment Farms-On the paper application question #40a/ISIR field #265. The paper application identifies #40a as Current Total of Cash, Savings, and Checking accounts however, the File layout identifies #40a as Net Worth of Businesses/Investment Farms. The field name is Total of Cash, Savings, and Checking accounts- On the paper application question	133.k) The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.

		40c/ISIR field 267. The paper application identifies #40c as Current Net Worth of Businesses and Investment Farms however, the ISIR layout identifies 40c as Total of Cash, Savings, and Checking accounts. Sincerely, CSAC Executive Leadership Team	
0137	134	I encourage ED to consider adding the housing choice question to the FAFSA. The proposal for the 2024-2025 FAFSA removes the student housing choice question. Financial Aid offices may utilize the data from this question to determine cost of attendance amounts for students living at home v. living on their own v. living on campus. The cost of attendance cannot be figured accurately without knowing a student's housing choice. If the question is removed from the FAFSA, it will put a burden on aid offices to try to gather the information a different way through additional forms.	134) Refer to response for comment number <u>1</u> .
0138	135.a	As it is proposed, the draft FAFSA indicates that the net worth of businesses and investment farms should be reported as an asset. We suggest that if a family home resides on the same property as the business or farm, the net worth of the business or farm should not be included. Businesses and farms that are co-located with family homes cannot be easily liquidated to fund a college education. If a family were to liquidate their business/farm physical assets (e.g., land, machinery, equipment) associated with the land in which their family home occupies, they may be in danger of losing both future income and their primary residence.	135.a) Refer to response for comment number <u>51.a</u> .
	135.b	In addition, the current FAFSA asks a housing question that schools utilize to determine the Cost of Attendance for their students. Based on the language in the FAFSA Simplification Act, the Department of Education does not believe they have the authority to ask that question so it has been eliminated from the FAFSA. But schools are required to utilize an accurate Cost of Attendance when calculating financial aid packages for their students. Without this question, schools will need to have a supplemental application to collect the housing intentions of their students, which will add administrative burden to the institution and delay packages getting into the hands of students. The only other option is to make some blanket assumptions, i.e., all freshmen live in the residence halls, but those may not be accurate assumptions. If there is a program review and a school can't document the COA, there could be financial implications – the Department could claim we awarded too much aid to a student, for example.	135.b) Refer to response for comment number <u>1</u> .
0139	136.a	May 16, 2023 Via Federal eRulemaking Portal (www.regulations.gov) Darrin Zhao-King Director of the Information Collection Clearance U.S. Department of Education 400 Maryland Avenue SW, LBJ, Room 224-84 Washington, DC 20202-4537 OFFICE OF THE PRESIDENT 1111 Franklin Street Oakland, California 94607-5200 Re: Docket No.: ED-2023-SCC-0053, Agency Information Collection Activities; Comment Request; 2024-	136.a) Refer to response for comment number <u>81</u> .

	<p>2025 Free Application for Federal Student Aid (FAFSA)</p> <p>Dear Mr. Zhao-King:</p> <p>On behalf of the University of California (UC), one of the country’s premier public research university systems, serving more than 300,000 students, we appreciate the opportunity to comment on the draft text and supporting materials for the 2024-25 Free Application for Federal Student Aid (FAFSA) form.</p> <p>UC has reviewed the draft materials and appreciates the effort needed to re-work and restructure the application and process as a result of the significant overhaul required by the “FAFSA Simplification Act” as included as part of the <i>Consolidated Appropriations Act, 2021</i> (Public Law 116-260). The suggestions that have been noted in comments on the attached FAFSA drafts are an effort to further refine language for greater understanding, specificity, and consideration of the unique circumstances of students.</p> <p>A few highlights UC would like to point out include:</p> <p>Retaining the number in college for those institutions that need to continue to model how the Student Aid Index (SAI) may affect institutional aid programs and avoids institutions asking students to complete another form</p>	
136.b	Removal of the need-based employment question will negatively impact students in state and/or university need-based work-study programs	136.b) Refer to response for comment number <u>60.b.</u>
136.c	Removal of housing-related questions, which impacts institutions’ ability to determine a student’s budget based on one’s living situation and overall cost of attendance	136.c) Refer to response for comment number <u>1.</u>
136.d	Revisions to account for language which may be received with heightened sensitivity	136.d) Thank you for your comment.
136.e	Simplifying the application for incarcerated students to address information challenges	136.e) Thank you for your comment.
136.f	<p>We applaud the Department’s efforts to restructure the application and align with the “FAFSA Simplification Act.” We also appreciate the opportunity to comment on the proposed drafts and welcome additional engagement.</p> <p>Is consent continuous until revoked? Suggest to adjust if this is permitted by law as it removes this step to renew the FAFSA each year.</p>	136.f) Thank you for your comment. Consent and approval must be provided each year a FAFSA form is completed.
136.g	Does this need to be a separate field? Perhaps instead relabel the SSN field to SSN or ITIN as applicable?	136.g) Thank you for your comment. The Department of Education gathered a considerable amount of input from many parties and usability studies and used current industry design standards and best practices to

			implement this change.
136.h	Suggestion to be more specific: "When the student begins the 2024-25 school year, will they have completed their first bachelor's degree?"		136.h) This text is under revision.
136.i	rephrase for clarity to: "Will the student be pursuing their first teaching certificate for elementary or secondary level?"		136.i) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
136.j	Legal guardianship is very easily abused. While this is not the place, suggest to revisit how to close this loophole. For now we suggest explicitly excluding temporary guardianship in this text.		136.j) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
136.k	Rephrase for clarity to: "Do you, the student, maintain a relationship with your parents but they are unwilling to provide their information for the FAFSA?"		136.k) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
136.l	Thank you for maintaining this question. Though it does not affect SAI, campuses have designed their institutional aid programs around the prior EFC formula. As such, they must evaluate the impact of change from EFC to SAI on budgets and determine how to proceed. Maintaining this question for now is useful for the transition.		136.l) Thank you for your comment.
136.m	Could "Other" be renamed " " for students to identify their tribe of origin? The subtext could then read: "Enter your tribal name." This more closely aligns with how American Indians prefer to be identified (by their tribal name). Though ED may not use it for this fashion, it would speak more positively to Native peoples.		136.m) Thank you for your comment. This text is under revision.
136.n	Is "None of these apply." necessary if this is an optional question?		136.n) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(ii)(XVII). "None of these apply" is a needed response to determine applicability.
136.o	"or will" seems to be unnecessary since the FAFSA now collects prior prior year tax data and any federal extension deadline would have passed.		136.o) Thank you for your comment. Some tax filers may qualify for additional extensions.
136.p	I am assuming because this is a paper version of the FAFSA that these questions will be autofilled if student consents to IRS info sharing.		136.p) Certain fields in the online FAFSA form will be prefilled based on internal logic.
136.q	Removal of need based employment question would penalize students who are on institutional need based workstudy or state workstudy programs (e.g. California's Learning Aligned Employment Program).		136.q) Refer to response for comment number 60.b .
136.r	Similar to net worth adjust second sentence to more clearly define as sum of the values of each asset to its own debt.		136.r) Thank you for your comment. The Department of Education believes the current

			instructions provide adequate guidance.
136.s	Suggested text adjustment to reduce underwater property debt being applied to other net positive property: "Don't include the home the student lives in. Net worth is the sum of the value of each investment less any debt owed against it."		136.s) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
136.t	Similar to student's question, remove "or will" since this implies they filed for extension but extension deadline would have passed as well.		136.t) Thank you for your comment. Some tax filers may qualify for additional extensions.
136.u	Could be misinterpreted to mean legal guardian. I would suggest linking to "Who is considered a legal parent on the FAFSA form?" as is done above to reference who is considered a parent prior to the field.		136.u) This text is under revision.
136.v	Given the complexity of who is included in the family based on marital status, I would suggest referring the applicant to the instructions.		136.v) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
136.w	Rephrase for clarity: "Do not include parents."		136.w) Refer to response for comment number <u>7</u> .
136.x	See same comment for student above.		136.x) Thank you for your comment.
136.y	rephrase for clarity: "The parent(s) did not file a U.S. tax return because they did not earn more than the minimum required to file.		136.y) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
136.z	Similar to net worth adjust second sentence to more clearly define as sum of the values of each asset to its own debt.		136.z) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
136.aa	Suggested text adjustment to reduce underwater property debt being applied to other net positive property: "Don't include the home the parent lives in. Net worth is the sum of the value of each investment less any debt owed against it."		136.aa) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
136.ab	rephrase for clarity: "The other parent did not file a U.S. tax return because they did not earn more than the minimum required to file.		136.ab) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
136.ac	Insert duration to which this authorization applies.		136.ac) Please see redisclosure clause in the Federal Tax Information (FTI) Consent and Approval section.
136.ad	Assuming this graphic will be updated with the new rules on parent? Currently has resides with.		136.ad) Thank you for your comment. The graphic will be updated.
136.ae	Is this misleading? Incarcerated students are only eligible for Pell correct?		136.ae) Thank you for your comment. The only differences between the FAFSA form and the FAFSA form for incarcerated students are administrative. It is up to the school the applicant is attending to determine what type of aid they are eligible for.

136.af	Remove: "(which can include living expenses") since that budget component is not part of the budget for incarcerated students	136.af) Refer to response for 136.ae .
136.ag	Remove mentions of components not allowed for incarcerated students - throughout document.	136.ag) Refer to response for 136.ae .
136.ah	Perhaps redundant to indicate prison penalty if they are incarcerated?	136.ah) Refer to response for 136.ae .
136.ai	For those who do not know their SSN, getting access is extremely difficult. Could ED make a help note on this and what the incarcerated member should do to be able to compete it its absence?	136.ai) Refer to response for 136.ae .
136.aj	Phone numbers are not relevant for incarcerated students. Listing this as required will cause stress and confusion.	136.aj) Refer to response for 136.ae .
136.ak	acknowledge that these contact Like mobile phone number, these information data points are likely unavailable for incarcerated students. Could ED list alternative designated contacts, like an educational program staff person or a designee in the financial aid office at the relevant institution, who can manage federal financial aid communications. (e.g. a Program Coordinator at the prison where UC Irvine operates their program for incarcerated students performs this function for some students.)	136.ak) Refer to response for 136.ae .
136.al	Those who are married may not have legal ties with the spouse, or they are legally tied but estranged. Could ED have a statement on the form acknowledging the potential tenuousness of family relations for those who are incarcerated, or allowing some kind of certification of lack of contact or financial engagement with a spouse would be potentially ideal.	136.al) Refer to response for 136.ae .
136.am	Suggestion to be more specific: "When the student begins the 2024-25 school year, will they have completed their first bachelor's degree?"	136.am) Refer to response for 136.ae .
136.an	rephrase for clarity to: "Will the student be pursuing their first teaching certificate for elementary or secondary level?"	136.an) Refer to response for 136.ae .
136.ao	Could this option apply to an incarcerated student?	136.ao) Refer to response for 136.ae .
136.ap	If selection is optional here, remove "None of these apply"	136.ap) Refer to response for 136.ae .
136.aq	This may be a tricky question for someone who is incarcerated. It could be interpreted that they lack a fixed permanent residence if they are incarcerated	136.aq) Refer to response for 136.ae .
136.ar	The last phrase of "or would contacting parents pose a risk.." may be insensitive. Could the question instead be left open ended: "Do unusual circumstances prevent the student from contacting their parents?"	136.ar) Refer to response for 136.ae .
136.as	We would anticipate that incarcerated students may have unique family circumstances which may make this question difficult to answer. We would suggest the Department work with Prison Education Programs or other groups more familiar with the varied situations to inform this text and areas tied to dependency.	136.as) Refer to response for 136.ae .
136.at	This may be difficult to determine for those incarcerated for an extended period. Could an alternative question be posed?	136.at) Refer to response for 136.ae .
136.au	As mentioned previously, supplying this information may be problematic in many cases. Could ED allow a statement on the form acknowledging the potential tenuousness of family relations for those who are incarcerated, or allowing some kind of certification of lack of contact or financial engagement with a	136.au) Refer to response for 136.ae .

		spouse would be potentially ideal.	
0140	137	We are required to build a Cost of Attendance for students based on where they are living. The only way to find out where students will be living is to ask them. Removing this from the FAFSA is forcing schools to develop their own forms to ask this question once they receive the ISIR and this will delay awarding. Please add this question back to the FAFSA.	137) Refer to response for comment number 1 .
0141	138.a	Question #4, the "other undergraduate" category should also list "2nd undergraduate degree"	138.a) This text is under revision.
	138.b	and the "College graduate, professional..." should be worded differently since "college graduate" is a broad definition and students with any type of college degree will mark this.	138.b) This text is under revision.
0142	139	Question #9, The instructions for family size on the 24-25 FAFSA are minimal compared to the previous FAFSA. Could these instructions be expanded as they were in 23-24? This is a concern for situations where the FTI process does not pull in exemptions as the number in family.	139) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
0143	140	Question #22 & #40, Assets should not include a family farm or business with less than 100 employees. Instructions are not clear – what is definition of "for profit agricultural operations?" Also, the 24-25 instructions refer to an "investment farm" which is different than a "family farm." In the instructions on the 23-24 FAFSA, it states, "Investment farm value does not include the value of a family farm that you (your spouse and/or your parents) live on and operate." In the instructions on the 24-25 FAFSA, it states, "Business and/or investment farm value includes the market value of land, buildings, machinery,....." Is the 24-25 FAFSA defining an investment farm differently than on the 23-24 FAFSA? Please clarify what type of business or farm will be reported on the 24-25 FAFSA.	140) Thank you for your comment. 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®).
0144	141.a	Questions #20, 28, 38, 45: •Income Earned from work should have an alpha letter in addition to the line "1" of the tax return.	141.a) Refer to response for comment number 13.a .
	141.b	•Taxes Paid appears to refer to the incorrect line item of 25a. It should most likely be line 22 (minus Schedule 2, line 2).	141.b) Refer to response for comment number 13.a .
	141.c	For the grant/scholarship amount, why is the amount of grants/scholarships optional? Why is this amount not on the spouse section?	141.c) Refer to response for comment number 82.j
	141.d	Could the "reported as income to the IRS" be in bold letters as was done in 23-24?	141.d) This change will be made as requested.
	141.e	•Each field from the tax return should refer to the 2022 tax year.	141.e) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
0145	142	Question #35, number of family members in college, seems to exclude only one parent from the number in college. I would think the "other parent" should also be excluded. "Do not include the parent" might be rephrased to "Do not include either parent" or "Do not include parents."	142) This change has been made.
0146	143	The date of student/parent marital status was helpful when determining family situations. Since this was removed, we are without this resource for problem solving. Is this something that can be included?	143) Refer to response for comment number 104 .
0147	144.a	The U.S. Department of Education ("ED") recently released drafts of the updated Federal	144.a) Thank you for your comment. The

		<p>Student Aid Application material – these included the proposed 2024-2025 Free Application for Federal Student Aid (“FAFSA”) form and the FAFSA Submission Summary (formerly known as the Student Aid Report). We are writing to express our concern and disappointment that information about voter registration is not included in any portion of these materials. President Biden issued a groundbreaking Executive Order on March 7, 2021 Promoting Access to Voting (“Voting Access EO”). The FAFSA process is an ideal place to integrate voter registration and accomplish the goals of the Voting Access EO.</p> <p>Young people are much less likely to be registered to vote than older Americans, and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. We urge the Department to:</p> <ol style="list-style-type: none"> 1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, after students and families see the confirmation page. 	<p>Department of Education provides voting registration and election resources on StudentAid.gov, providing everyone who uses StudentAid.gov, not just FAFSA applicants, access to these resources.</p>
	144.b	<ol style="list-style-type: none"> 2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov. 	<p>144.b) Refer to response for comment number 144.a.</p>
	144.c	<ol style="list-style-type: none"> 3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail. <p>We appreciate the opportunity to provide these comments regarding the 2024-2025 FAFSA. We strongly urge the Department to make these recommended changes and make it easier for students to receive opportunities to register to vote and update their voter registration.</p> <p>Sincerely, Rose Reilly (Campus Vote Project Fellow)</p>	<p>144.c) Refer to response for comment number 144.a.</p>
0148	145	<p>I'm writing to support the request made in the attached March 16, 2023 letter from NASFAA regarding the removal of the Housing question on the 2024-25 FAFSA. As stated in the letter, this appears against the intent of FAFSA simplification, as it is necessary for institutions to have this information in order to develop the Cost of Attendance associated with awarding Title IV aid. This is not optional for schools....the information must be secured to award Title IV aid. Without this field, schools will have to put students through additional steps to collect this information (burden on students and schools), and attempt to develop a Cost of Attendance without a field in our software where this information resides (from the ISIR). This can all be solved to putting this question back on the FAFSA, which will serve students better in the end and keep with the overall intent of FAFSA simplification. Thank you for your consideration [attached NASFAA letter]</p>	<p>145) Refer to response for comment number 1.</p>
0149	146.a	<p>May 19, 2023</p>	<p>146.a) Refer to response for comment number 140.</p>

	<p>RE: ED-2023-SCC-0053 Subject: 2024-25 Draft FAFSA</p> <p>Thank you for the significant time and effort Federal Student Aid (FSA) has invested in the Free Application for Federal Student Aid (FAFSA[®]) “Better FAFSA, Better Future” initiative.</p> <p>I am sharing comments on the draft 2024-25 FAFSA from the Pennsylvania Higher Education Assistance Agency (PHEAA), which was created to provide affordable access to higher education for PA students and families. On behalf of the students and families we serve, we respectfully urge you to consider adjustments in the following areas of the draft FAFSA:</p> <p>Farm Value – Please further clarify the definition of an investment farm as a for-profit agricultural operation (questions 22 and 40) within the instructions for those fields. For example, do applicants need to refer to schedule F of their Federal Tax Return to identify if they have a for-profit agricultural operation? If so, could the instructions point the applicant to field E on schedule F of the 2022 Federal Tax Return where the tax filer is asked whether they materially participate in the operation of the farm? Additionally, would this be a situation where if they answer yes, then the value would not be reported, but if they answer no, then the farm would be considered an investment to include?</p>	
146.b	<p>Other Parent – Instructions for Other Parent 2022 Tax Return Information within question 45 could make it clearer that those that were married, filed jointly in 2022, and currently remain married, need not complete this section. Applicant instructions on page 19 would ideally appear within the actual question section and not only on page 19.</p>	146.b) This change will be made.
146.c	<p>Marital Status Differs from That of Tax Return – Provide additional instructions for currently divorced/separated parents or students who had filed a joint tax return in 2022 with a spouse but are no longer married. Explain how to answer the questions about income, for example the instructions could say: Those who file a joint federal return in 2022 and then are divorced, separated, or widowed before the FAFSA is submitted must determine how much of the income and taxes paid are attributable to them, not their spouse. You can calculate the individual income and taxes paid using the joint return, related schedules, and W-2 forms. Any interest or business income earned on joint accounts or investments should be assessed at 50%. The same procedure should be used to divide business or farm losses.</p>	146.c) Thank you for your comment. 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 [®]).
146.d	<p>Other Parent – Instructions for Other Parent 2022 Tax Return Information within question 45 could make it clearer that those that were married, filed jointly in 2022, and currently remain married, need not complete this section. Applicant instructions on page 19 would ideally appear within the actual question section and not only on page 19.</p>	146.d) Refer to 146.b
146.e	<p>Family Size – It would be helpful to add instructions for the applicant to locate the number of exemptions claimed on the 2022 tax return and answer the family size question if the tax return exemptions no longer match the current family size. The instructions could provide examples of instances where family size may</p>	146.e) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.

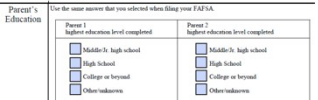
		have changed, such as divorce, death, marriage, births, older siblings no longer in the home, divorce decrees assigning options to claim children, etc.	
	146.f	Annual Child Support Received – This question includes instructions that the amounts listed should be for the “last complete calendar year,” which may be confusing to applicants as to whether it is simply the prior 12 months to application or the last actual year (for example, the total received in 2023 if applying in April 2024). Aside from clarifying the 12 months, for consistency across the applicant pool, this would ideally be the same 12-month period for all applicants. For example, 2022 would both match the tax year being utilized for income purposes and would also be the most recent complete calendar year prior to the 2024-25 FAFSA application window opening.	146.f) Refer to response for comment number 107.x .
	146.g	<p>Application Window – With the already anticipated delayed opening to the 2024-25 FAFSA application window, we respectfully request that FSA do everything possible to hold to the publicized timeline of delivery of the new FAFSA in the 4th quarter of 2023, so as not to further disrupt completion.</p> <p>Thank you for the opportunity to comment on the draft 2024-25 FAFSA and for your consideration of the above recommendations and requests for clarification. We look forward to continuing to partner with FSA in serving the postsecondary education needs of students and families.</p> <p>Sincerely,</p> <p>Elizabeth K. McCloud Vice President PA State Grant & Special Programs</p>	146.g) Thank you for your comment.
0150	147.a	Q 2 email address, state: Do NOT use your high school email.	147.a) Thank you for your comment. 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®).
	147.b	Q’s 3, 20, 32 & 45 Does the separation have to be legal, or just that they live in separate residences?	147.b) Refer to response for comment number 29 .
	147.c	Q 4 Why is this question “What college degree or certificate will you be working on when you begin the 2024-25 school year - 1 st bachelor’s, 2 nd bachelor’s, College graduate or professional degree” left out of Q 4?	147.c) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA

			Simplification Act, or (c) by the FUTURE Act.
147.d	Can Q 5 state “federal” in the question, The student is currently serving on federal active duty in the U.S. armed forces, for purposes other than training?		147.d) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
147.e	Q 7 add the word “biological” to 2nd bullet - Are abandoned by or estranged from their biological parent, and have not been adopted. To the 6 th bullet - Are otherwise unable to contact or locate their biological parents, and have not been adopted. As some kids consider their foster parents as their parents.		147.e) This text is currently under revision.
147.f	Add the word “now” to Q’s 9 & 34 Also include other people if they now live with the parent and parent will provide more than half of their support between July 1, 2024 and June 30, 2025.		147.f) Thank you for your comment. This change will be made.
147.g	Q 10 Why are we getting rid of discount for multiple students in college?		147.g) Refer to response for comment number 40 .
147.h	Could Q’s 15 & 16 be moved into the parent section. It seems very random to have them in the student section.		147.h) Thank you for your comment. These questions are required either (a) to determine eligibility or aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act. Regardless of the parent being a party to the form or not, these questions have to be asked; therefore, it is appropriate for them to be in the student section.
147.i	Can “None of the previous” be removed from Q 17?		147.i) Because this question requires a response, “None of the previous” is needed for those applicants who don’t meet the criteria specified in the other responses.
147.j	Q’s 19 & 27 Why doesn’t the student/student’s spouse sections not have the same questions as in Q’s 37 & 44 of the parent/other parent sections ?		147.j) Thank you for your comment.
147.k	Q’s 20, 28, 38 & 45 Income earned from work is it just the 1040-line 1a OR is it 1040 lines 1a plus (1a through 1i) and 1z?		147.k) Refer to response for comment number 13.a .
147.l	Q’s 20, 28, 38 & 45 For questions regarding the IRA or Pension it should state if negative add (-) before the number.		147.l) Refer to response for comment number 13.a .
147.m	Q’s 20, 28, 38 & 45 Did the student receive the earned income tax credit (EITC)? IRS Form 1040: line 27a. There is no 27a and it’s called EIC on line 27 of the tax return. Make them the same to not confuse students.		147.m) Refer to response for comment number 13.a .
147.n	Q’s 20, 28, 38 & 45 Why do we include income from Schedules C & F under income from work, but only ask if the business has a profit or loss, but not the farm?		147.n) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid

			in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
147.o	Q's 21 & 39 Why are we only counting child support received and not also count child support paid out?		147.o) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
147.p	Q's 22 & 40 Why are business and investment farm value included as assets when other investments that can more easily be liquidated are not? Farms and businesses generally have assets that can't be quickly sold, and if they do sell the assets (for example: farm equipment) then how do they keep farming?		147.p) Refer to response for comment number 51.a .
147.q	Q 23 Housing status has been removed so we can't accurately determine COA without obtaining that information elsewhere (thereby creating a potential delayed or inaccurate award offer as well as administrative burden).		147.q) Refer to response for comment number 1 .
147.r	Q's 24, 29, 41 & 46 Why is the consent after they have filled in all of the tax information? It's simpler if you use DRT (FTI) instead of filling it all in and then giving consent.		147.r) Thank you for your comment. Consent and approval are collected at the start of the application when completing the FAFSA form online. If an applicant is completing a PDF FAFSA, we must collect the tax return information in case the information cannot be obtained via the IRS.
147.s	Q's 24, 29, 41 & 46 What happens if the person doesn't click on the consent to transfer? Do they get an error message? Does it suspend and error out?		147.s) Thank you for your comment. The applicant and any contributor(s) required to be on the FAFSA form must provide consent and approval for an SAI to be calculated. Any party that does not provide affirmation initially will receive a follow-up email requesting they do so if an email has been provided. If there is an issue with IRS connectivity while a user is working on the FAFSA form a message will display stating that the IRS is unavailable, and the user should try again later. The user will be informed that they may choose to continue and manually provide their tax return information, which will be used to calculate their Student Aid Index; however, federal student aid eligibility may change once access to the IRS system is restored and the Department of Education can validate their manual entries.

	147.t	Q's 24, 29, 41 & 46 Everyone needs to apply for their own FSA-ID before they start their FAFSA, and that everyone needs their own FSA-ID that has to be verified is time consuming – making the simplified version more complex.	147.t) Refer to response for comment number <u>2</u> .
	147.u	Q's 29 & 46 No idea where spouse/other parent is, but there is no “legal separation” or if there's a divorce/separation and they aren't on good terms. Other spouse/parent is incarcerated or lives in a remote village overseas, and can't give consent or get a signature. How are they supposed to get the information? Nothing like putting the student in the middle, especially if the issue is between the student and parent.	147.u) Refer to response for comment number <u>28</u> .
	147.v	Q 30 How do you determine which parent to use when separated/divorced parents feel that they are 50/50 split, or it could be a situation of living with one parent while the other parent pays for the student insurance, car, phone, etc., but there isn't a relationship with that parent?	147.v) Refer to response for comment number <u>16</u> .
	147.w	IMPORTANT!!! Please STOP saying Congratulations your FAFSA has been processed. Instead say Review your FAFSA and read the comments to see if you need to correct the FAFSA or submit documents to the college. Thanks.	147.w) Thank you for your comment.
0151	148.a	NASSGAP thanks the Office of Federal Student Aid for all the work done to implement the incredibly important updates to the FAFSA and to open doors for millions of future students. Many of NASSGAP's members have submitted comments individually, often after an internal approval process. Based on past experience, however, we wanted to provide additional comments provided by our members that they were not able to deliver through official channels, perhaps due to approval delays (e.g., many state legislatures are in session and trying to finalize budgets) or simply do not have the bandwidth given the volume of aid awards they are trying to make for the upcoming academic year. What follows are comments from various NASSGAP members trying to give FSA additional insights into the praise states have for the new form, as well as concerns about the new form, potential unintended consequences. Additionally, some of the comments are more questions or suggestions, as we're not able to review and comment on the e-FAFSA, which is what the vast majority of FAFSA completers will use. Skip logic may dictate a different approach than what is on the paper FAFSA. In the following comments, “I” or “We” refers to the NASSGAP member or state submitting the comment, not NASSGAP as a whole. Some members may have conflicting opinions. Housing Many of our members would like to see the current 2023-24 FAFSA “housing” questions (98.b,d,f,h) retained to assist FAAs – and states – in determining the student's full cost of attendance as part of question 23 in the new FAFSA. In many of these states, they will need to find an alternate means to ask	148.a) Refer to response for comment number <u>1</u> .

		the question if not provided via the FAFSA.	
	148.b	<p>Definition of Parent (p.19 on Instructions)</p> <p>We are concerned that students and parents, especially those from first generation families, families with non-traditional structures and other first-time completers of the FAFSA, may not correctly interpret who is considered the parent and may presume they are not eligible to complete the FAFSA or may proceed with the wrong 'parent(s)'</p>	148.b) Thank you for your comment.
	148.c	<p>Regarding Parental Education/First Generation Student – Question 15</p> <p>We would prefer a deeper dive into the parental level of education than the current question. While we don't want to suggest making the question more complicated for students, we think there may be some value in continuing to collect educational attainment level for each parent. I like the suggestion of some "logic" being added so students are not overwhelmed by many questions or options that may not be applicable or cause wider variation in their responses.</p> <p>Having more the "deeper dive" question could help us better align our state definition with the information available on the FAFSA and be able to better identify first-generation college students for programs that require they receive prioritization in awarding.</p> <p>The questions/options confounded us a bit, for a few reasons. First, yes there should be a question on the form on parental status, we use it for a variety of awarding and other analysis of those we award either public or private \$\$\$.</p> <p>Second, a deeper dive set of options should be available.</p>	148.c) Refer to response for comment 73.d .
	148.d	<p>I am wondering and honestly have not investigated if the definition of "first generation" student has or will change as well with the new FAFSA. A common definition used by researchers has been: "A first-generation student is someone whose parents or legal guardians have not completed a 4-year degree at a college or university in the United States during their formative years.</p> <p>we could use three of the deeper dive responses. We would only need to know the highest degree obtained by either parent; we wouldn't need to know both. If the wording of the current response 4 was changed slightly, response 3 wouldn't be needed.</p> <ol style="list-style-type: none"> 1. Neither parent a68ended college 2. One or both parents a68ended college, but neither parent completed college 3.—One or both parents completed college— 	148.d) Refer to response for comment 73.d .

	<p>4. If one or both parents completed college, what was the highest degree level each obtained was (e.g., certificate, Associates, Bachelors or postgraduate)</p> <p>We think the following would be helpful:</p> <ol style="list-style-type: none"> 1. Neither parent attended college 2. One or both parents attended college, but neither parent completed college earned a degree or certificate 3. One or both parents completed college and earned a degree or certificate <p>We don't know that the type of degree is quite as critical when we try to balance with FAFSA simplification and reducing questions. I think even if students answer the question, their answers won't be 100% accurate.</p>	
148.e	<p>Would it be better to ask the parent(s), rather than the student, these questions? The student may not know, and it may be awkward to ask. Or if the student leaves it blank (or "don't know"), populate the question on the e-FAFSA for the parent(s).</p>	148.e) Refer to response for comment 147.h .
148.f	<p>A deeper dive set of options is better, to arrive at the level of education of the parents, and to be more inclusive we should consider education levels within and outside of the United States. As you know immigrant populations who arrive with college and postgraduate educations from their home country have a different generational experience and expectations (before and after the arrive to the US) than those who don't and specially those who had a very limited basic education opportunity or none.</p> <p>For reference and not advocating for exact language here is a questionnaire "post-FAFSA" we use in our private scholarship application:</p>  <p>The screenshot shows a form titled 'Parent 1 Education' and 'Parent 2 Education' with instructions 'Use the same answer that you selected when filing your FAFSA'. Each parent section has a 'Highest education level completed' label and four radio button options: 'Middle/ Jr. high school', 'High School', 'College or beyond', and 'Other unknown'.</p>	148.f) Thank you for your comment.
148.g	<p>Gender, Race and Ethnicity – Questions 11 and 12</p> <p>Regarding the gender and race/ethnicity questions on the FAFSA. If the questions are optional, can they be handled in a post FAFSA survey or through other methods. Our agency has concerns with these questions when they are not needed for the processing of financial aid and the point is to simplify it and</p>	148.g) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.

		not ask unnecessary questions. A related concern expressed by another agency is that if the student gets questions they consider invasive and become concerned about the privacy of their FAFSA, they may decide not to complete the FAFSA.	
	148.h	<p>Student and Parent Assets – Questions 22 and 40 – Summarized, not Verbatim Quotes unless in Quotation Marks</p> <p>Many states submitted comments along the lines of opposing the inclusion of family farms in the asset question. We – the members of NASSGAP – recognize that the long-term solution to this issue will require legislation. “It’s completely unfair for family farmers to include the value of their farm, which is also their primary residence, when other far wealthier families get to exclude the value of their primary residence, even when those families can easily take out a second mortgage loan when most family farms are already in debt”. Given that constraint, “we believe that the wording of questions 22 and 40, and the reference to ‘investment farms’ accurately captures the bipartisan intent of the FAFSA Simplification Act, which was to ensure that large farms encompassing multiple residences (i.e., one farmer bought others) are considered as assets.” We are happy to discuss potential approaches to a legislative fix on this issue, but the overwhelming majority of NASSGAP members recognize that a small to medium-size family farm is not an asset that can be used to pay for college expenses like a stock, mutual fund or savings account can be used.</p>	148.h) Refer to response for comment number 51.a .
	148.i	<p>Revocation of IRS Consent re: Questions 24, 41 and 48</p> <p>Our only other comment related to the DRAFT 2024-2025 FAFSA is that we found the statement related to revoking consent to use FTI to be unclear to students/parents. If they revoke consent, does that give up possibility of future aid, or does it also jeopardize the aid that was already determined based on the FTI that the school/agency had consent for at the time it was used?</p> <p>[picture of statement]</p> <p><small>* I am permitted to provide my approval and consent for the disclosure and use of my FFI, as defined herein, at University of Tennessee. However, the revoking, suspending and consent, neither a nor other applicants for which I participated and shared my FFI will be eligible for federal financial aid and other federal aid programs that need FFI to make determinations for eligibility of aid provided by the institution of higher education, state higher education agency, or other designated non-profits organization.</small></p>	148.i) Thank you for your comment. Please see the revised Federal Tax Information (FTI) Consent and Approval language.
0152	149	<p>Unaccompanied Homeless Youth Question:</p> <p>While I appreciate the expansion of circumstances that may qualify a student, I find myself concerned that in order for a student to qualify they must have an adult who can determine that what they are saying is valid. Why do the lived experiences of unaccompanied or homeless youth need to be verified by another person other than themselves? Many youths conceal their homelessness for fear of being placed in care or being separated from their families. I met a young woman the other day who at 16 her parents kicked her out and she lived out of her car till she was 18, old enough to rent an apartment. She didn't tell anyone, no one at school or authority. She was afraid of being put in foster care. She felt safer living on her own. She does not technically have proof. The burden of proof of homeless is high for those who have survived this trauma. This student should be able to validate her own experience.</p>	149) Thank you for your comment. The Department of Education implemented this change in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.

0153	150	<p>Are there guarantees of safety and security for parents who are now required to out themselves as non-citizens to create an FSA ID. How will their information be protected so that a decision to support their child with documentation status to receive Financial Aid will not be at their own expense or deportation? Will their safety be at risk depending on the administration in office? I worry that taking away the signature page where a parent can sign without an FSA ID will be a barrier for many families who mistrust our systems (understandingly so) and may prevent students from mixed-status families from receiving the funds they are legally qualified to receive.</p>	<p>150) The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.</p>
0154	151	<p>It is essential that the housing status question remain as part of the FAFSA. While it will not factor into the SAI calculation, it plays a gigantic role in determining a student's Cost on Attendance and need. The goal of FAFSA simplification is to remove barriers for students to attend college. While having less questions on the FAFSA is nice, the removal of the housing question puts the burden on higher education institutions to gather this data separately. This will mean adding an additional form for students to complete at every school they will apply to. If a student lists 20 schools on their FAFSA, they will also need to complete 20 housing forms at all these schools. Should a student forget to complete the housing form, it will delay their aid offer from being received in time for them to decide where to attend. If the question were to remain, the student could simply answer it when completing the FAFSA, as they always have. As I write this, it is only May 20th. The 24/25 FAFSA can be release as late as January 1st. Please, work on adding this question back in now. Even if we must wait for the 24/25 FAFSA until January 1st, it will be better for all to have this question included not only for financial aid administrators, but most importantly, for our students. I am attaching NASFAA's letter, which I whole heartedly support. [attached NASFAA's letter]</p>	<p>151) Refer to response for comment number <u>1</u>.</p>
0155	152	<p>The new FAFSA form will be used to implement the Student Aid Index, which can be as low as -\$1500, as compared to a minimum of \$0 for the EFC. The intent of Congress was to highlight distinctions between the neediest students. Earlier this year, FSA apparently provided oral guidance that a student's aid awards cannot exceed the cost of attendance. I believe this guidance contradicts the intent of Congress, which was to recognize that some students are working to help pay the family's bills and the loss of their income when they attend college full-time will impact the family. While I understand that federal aid awards cannot exceed the cost of attending college, I don't think FSA should preclude institutions of higher education (IHEs) and states from addressing the needs identified by a negative SAI. If that student is a parent, childcare becomes an additional expense when the student is attending classes. I would also note that emergency aid, such as a car repair for a commuting student, should be exempt from any cap on student aid relating to generic cost of attendance. While many states will treat a negative SAI as being equal to zero, IHEs are better able to distinguish need in their professional judgments and some states may implement the ability to award based on a negative SAI; FSA should not preclude these activities to help the neediest students.</p>	<p>152) Thank you for your comment.</p>
0156	153.a	<p>As it is proposed, the draft FAFSA indicates that the net worth of businesses and investment farms should be reported as an asset. We suggest that if a family home resides on the same property as the business or farm, the net worth of the business or farm should not be included. Businesses and farms that are co-</p>	<p>153.a) Refer to response for comment number <u>51.a</u>.</p>

		located with family homes cannot be easily liquidated to fund a college education. If a family were to liquidate their business/farm physical assets (e.g., land, machinery, equipment) associated with the land in which their family home occupies, they may be in danger of losing both future income and their primary residence.	
	153.b	Also, there is a lack of clarity on whether the NCES high school code will be included in the ISIR files produced by FSA. Including the NCES high school code on the ISIR files helps states verify students' high school graduation for scholarship eligibility. Will the NCES high school code be included on the ISIR file?	153.b) Yes, the NCES high school code will continue to be included in the ISIR.
	153.c	Lastly, the FAFSA only requires a preparer to provide their information and sign the form: "If a fee was paid to someone for advice or for completing this form, that person must complete this section." This new version indicates: "If someone other than the student, student spouse, parent, or other parent completed this form on the applicant's behalf, that person must complete the Preparer section." This would result in a tremendous barrier to FAFSA completion assistance if anyone providing assistance with completion of the form will be required to provide their social security number and sign the form. It is unclear as to the intent behind this change and the potential responsibilities implicating the preparer given they would be signing the form. The instructions indicate "Leave blank any questions that don't apply to the preparer.", but does that include SSN? Would incomplete fields in this section, such as omission of the SSN, signature, or any other field result in rejection of the form?	153.c) Thank you for your comment. The preparer section is only to be filled out if someone completed the form on the student's behalf, not just that someone provided assistance.
0157	154	As the official voice of the UC Berkeley student body, I am writing to day to advocate for the Department of Education to integrate voter registration into the Free Application for Federal Student Aid ("FAFSA") process. Our over 40,000 students stand in support of this opportunity as it would increase access to the democratic process, particularly among historically disenfranchised communities. Approximately 84% of Black students, 74% of Hispanic students, 68% of Asian students, and 75% of Native American students complete the FAFSA. Integrating voter registration into the FAFSA process would help reach students who often have difficulties navigating the difficult voter registration process or keeping their registration up to date. If the Department of Education integrates a high-quality voter registration opportunity for the students and families they serve, it could generate millions of new applications and voter registration updates annually. Please reach out if you have any additional questions or would like testimonials from our student body.	154) Refer to response for comment number 144.a.
0158	155.a	I write on behalf of College Promise, a national non-partisan, non-profit organization that works to build broad public support for ensuring that hard-working students have access to at least two-years of quality postsecondary educational opportunities, and in response to the U.S. Department of Education's ("the Department") request for public comment on its recently released draft of updated Federal Student Aid application material. That material includes a newly proposed 2024-2025 Free Application for Federal Student Aid ("FAFSA") form and FAFSA Submission Summary (formerly known as the Student Aid Report). Our desire is that non-partisan information about voter registration be coordinated with these and other widely disseminated student contact materials.	155.a) Refer to response for comment number 144.a.

		<p>As you know, President Biden issued a groundbreaking Executive Order on March 7, 2021, designed to promote access to voting (the “Voting Access EO”). It is well-established that young people are much less likely to be registered to vote than older Americans, and students of all ages in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. The FAFSA process offers a high leverage point of opportunity to facilitate voter registration on a non-partisan basis and accomplish the goals of the Voting Access EO.</p> <p>Accordingly, we urge the Department to:</p> <p>1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of FAFSA filing, after students and families see an on-line confirmation page;</p>	
	155.b	2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov; and	155.b) Refer to response for comment number 144.a.
	155.c	<p>3. Provide options for FAFSA applicants to indicate they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF can and should be provided with all FAFSA Submissions Summaries sent through the mail.</p> <p>Timely action by the Department is essential. If it does not begin the process of integrating and coordinating voter registration information now into the FAFSA process, millions of college students and their families could miss out on their opportunity to vote in the 2024 election.</p> <p>We hope you agree with the need for rapid action and appreciate the opportunity to provide public comments regarding the 2024-2025 FAFSA process. Regardless of political party and preferences, I hope you agree with the goal of 100 percent student voter participation.</p> <p>When we all vote, we all win.</p>	155.c) Refer to response for comment number 144.a.
0159	156	<p>RE: USDE Docket ID Number ED-2023-SCC-0053, 2024-25 Free Application for Federal Student Aid (FAFSA)</p> <p>To whom it may concern:</p> <p>Thank you for working to simplify the FAFSA application process and documents on behalf of students and families. Work to advance college affordability and access is critical as needs for a skilled workforce continue to grow. While the spirit of the proposed changes is commendable, there are several areas of concern where the proposed policy will, in practice, work against the intent of the proposed changes. Lake Area Technical College recommends retaining the current exclusion of the net worth of family farms and small businesses as defined under the current expected family contribution (EFC) formula. This exclusion has been in place for years and is beneficial to many FAFSA applicants, particularly middle-income students. If implemented, this change would have a negative impact on many families across the</p>	156) Refer to response for comment number 51.a.

country where farming or running a small business is their primary livelihood. Federal policy should not cut off access to the necessary financial resources that make a college education attainable for students in these hard-working families. At the time when the net worth of a family farm and small business was included on the FAFSA, it was often confusing for families. Many families did not know how to accurately calculate their net worth as the value of property and land could vary from one extreme to another, depending on current market trends. This led to frustration and inconsistencies in completing the FAFSA. One of the goals of the FAFSA Simplification is to make the application easier for families to complete. This is not going to be accomplished under the proposed rules.

Owning a business or family farm does not automatically mean that families have liquid capital to use for educational purposes or that parents have the ability to secure Federal Direct PLUS loans. Many times earnings are reinvested in the business or farm. Families then struggle with the fact that it looks like they have money available to assist their student when, in reality, they do not. This hinders families from exploring higher education opportunities. Our driving goal is for students to obtain the education necessary to find a good paying job and have a successful career.

The exclusion of the business and family farm net worth has been beneficial to families; in many cases it has made these students eligible for a Federal Pell Grant. By requiring the net worth to be included, many of these students will no longer be eligible for grant aid. These students are then eligible for a combination of subsidized and unsubsidized Direct Loans or, in some cases, unsubsidized Direct Loans only. With the unsubsidized loan, the student is responsible for the interest while in school, or the student can opt to capitalize the interest, which is then added to the principal and increases the overall amount the student will owe. While the Federal Direct Loan program is a great option for many students to fund their education, a first-year dependent student Federal Direct Loan annual maximum is only \$5,500. At most colleges across the country, that amount is not enough to cover the direct costs of a full-time college education. (Direct costs include such items as tuition and fees, books and supplies, tools, and on-campus housing, if applicable.) These students are then forced to seek other options for paying for college. Unless these students are fortunate to receive sufficient scholarships to make up the difference, they many times are forced to resort to borrowing additional loans through a private education loan lender or the parent of a dependent student will borrow a Federal Direct PLUS Loan. The private loans have a higher interest rate than the Federal Direct Loan program. The proposed rules would put students from self-employed, entrepreneurial families at an unfair disadvantage to students who have more accessible liquid assets. Upon graduation and embarking on their careers, the students are saddled with a high amount of student loan debt and multiple loan payments. This can then have a direct impact on such decisions as buying a house and others that have a benefit to the overall economy. For many parents, taking on the additional burden of a Direct PLUS is not an option due to financial reasons.

LATC urges the U.S. Department of Education to not include the net worth of a farm and business as part of the proposed application components for the FAFSA. This is in the best interest of many students and families across the country, making a college education possible for the advancement of their careers and earning potential.

0160	157.a	<p>Thank you for offering the public to make comments on the draft version of the 2024-2025 Free Application for Federal Student Aid (FAFSA) published on March 1, 2023.</p> <p>Suggestion: Change “Other Parent” to “Stepparent/Other Parent” to reinforce that the stepparent is the person who provides information on the form if the student’s parent is married to the stepparent even if the other bio/adoptive parent is alive and part if the student’s life.</p>	157.a) Thank you for your comment. The text for this question is being revised.
	157.b	<p>Questions 19, 27, 37, and 44</p> <p>[Student/Spouse/Parent/Other Parent] Tax Filing Status</p> <p>Since Filing Status has a very specific meaning and is used in the next question, I recommend changing the title of these questions to “Status of the Student’s [Spouse’s /Parent’/Other Parent’s] Tax Return”</p>	157.b) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
	157.c	<p>Questions 19 and 27</p> <p>[Student/Spouse] Tax Filing Status</p> <p>Since nations and territories, not international organizations, define when individuals must file tax returns, I recommend changing the text of this section of these questions to “Did the student [spouse] earn income in a foreign country in 2022 or were they employed by an international organization but not required to report their income on a foreign tax return?”</p> <p>Also, it may be insulting to United States citizens living in US territories to be asked to answer yes to a question about filing a foreign return. Can the questions simply say “Did the student [spouse] earn income in a foreign country in 2022, were they employed by an international organization but not required to report their income on a foreign tax return, or did they file a tax return with Puerto Rico or another U.S. territory?”</p>	157.c) Thank you for your comment. The text for this question is being revised.
	157.d	<p>Questions 27 and 44</p> <p>[Parent/Other Parent] Tax Filing Status</p> <p>Since nations and territories, not international organizations, define when individuals must file tax returns, I recommend changing the text of the third bullet of this section of these questions to “Either the parent [other parent] earned income in a foreign country but still did not and will not file a foreign tax return or were they an employee of an international organization but not required to report their income on a any tax return?”</p>	157.d) Thank you for your comment. The text for this question is being revised.

		Note: the sentence structure for this question and the equivalent question for the student are different.	
157.e	Questions 20, 28, 38, 45 Student/Spouse/Parent/Other Parent Tax Return Information There is no Form 1040-line 1 anymore. And I believe that the more appropriate value would be from Form 1040-line 1z (and Form 1040-NR, line 1z) . Almost all the values that sum into Form 1040, line 1z are subject to Social Security and Medicare taxes. This instruction does not include Schedule K-1 (Form 1065), box 14, code A. Just want to point this point this out in case it is an oversight.	157.e) Refer to response for comment number 13.a .	
157.f	Question 20 Student Tax Return Information <ul style="list-style-type: none"> Since IRAs are not qualified plans and more people do rollovers into IRAs than qualified plans, this question would be more accurate if it read “IRA rollover into another IRA or qualified plan” and “Pension rollover into an IRA or other qualified plan” You can cite “IRS Form 5498, box 2” which is where the value of the rollover appears on Form 5498.	157.f) This change has been made as requested.	
157.g	Questions 20, 28, 38, 45 Student/Spouse/Parent/Other Parent Tax Return Information <ul style="list-style-type: none"> I think this should be IRS Form 1040, line 22 I do not know if it is an oversight or not, but “minus Schedule 2, line 2” is missing from this question	157.g) Refer to response for comment number 13.a .	
157.h	Questions 20, 28, 38, 45 Student/Spouse/Parent/Other Parent Tax Return Information It would be clearer if the instruction said “Add up line 31 on each of the parent’s Schedules C and report the sum”	157.h) Refer to response for comment number 13.a .	
157.i	Questions 20, 28, 38, 45 Student/Spouse/Parent/Other Parent Tax Return Information The instructional text here would not be clear to the student/parent, and they should report them even if they did not ultimately owe any tax. How about “Only include grants or scholarships reported on Form	157.i) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.	

		1040, Schedule 1, line 8r, and AmeriCorps benefits reported on Form 1040, Schedule 1, line 8z”	
157.j	Questions 20, 28, 38, 45 Student/Spouse/Parent/Other Parent Tax Return Information	The foreign earned income exclusion includes a component that appears on Form 1040, Schedule 1, line 24j. Since line 8d may include a “housing exclusion” for wage earners, and line 24j is the “housing deduction” for self-employed persons, both lines should be cited in the question.	157.j) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
157.k	The “income earned from work” question for joint filers will be skipped for the other parent if the parent answers “yes” that they filed a joint return.	As currently configured, the other parent’s income earned from work is part of question 45, so will be skipped if the parent and other parent are married to each other and filed a joint return. This would mean that the employment allowance will not be calculated correctly. I would suggest that the income earned from work question be separated from question 45 in some way. I have proposed a way to accomplish this in a separate suggestion.	157.k) Thank you for your comment. FAFSA Simplification regulations do not separate income earned from work (IEFW) for married spouses who file a joint return. Additionally, the FUTURE Act identifies IEFW as FTI; however, since the IRS doesn’t provide separate values for married filing jointly spouses, the FTI must be reported as the total amount on a joint return.
157.l	Definition of “Other Parent” – Instructions on page 19	This instruction does not specify that the “other parent” is, if the parent is married, the person that the parent is currently married to. Though this may seem obvious to those of us in financial aid, it may not be obvious to applicants and parents. Suggested alternative wording: “If the student’s parent is required to provide information in the Parent section, and that parent’s current marital status, as indicated in question 32, is married, or remarried, then the parent’s spouse must complete questions 42 and 43 of the Other Parent section. If the student’s parent is required to provide information in the Parent section, and that parent’s current marital status, as indicated in question 32, is unmarried and legal parents living together, then the student’s other legal parent must complete questions 42 and 43 of the Other Parent section. The other parent must also complete questions 44–46 if the parent answered “No” to “Did or will the parent file a 2022 joint tax return with their current spouse?”, in question 37.” or unmarried and both legal parents living together	157.l) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
157.m	Definition of “Separated” – Instructions on page 19 and 20	Suggestion 1: since the definition of “separated” is changing and now requires that a couple be legally separated (and not just living apart as though they were unmarried in the past), change the first phrase to “if the parents are divorced or legally separated” and/or add a bullet to the “current marital status” that describes the situation when parents are separated and not living together.	157.m) Refer to response for comment number <u>29</u> .
157.n	Suggestion 2: please define “support”. In discussions with aid officers about this change in parent who is required to provide information on the FAFSA, we were thinking about situations where one parent pays		157.n) Thank you for your comment.

		<p>child support and the other receives it – in this case, which parent would treat the child support as income (clearly the parent paying it is supporting the child’s household, but the parent receiving it is supporting the child with it.</p> <p>If this instruction is to have any impact, some definition is required. As we don’t know the answer to the above or other questions, I am unable to provide suggested text.</p>	
	157.o	<p>Asset Instructions (page 21)</p> <p>It is no longer necessary to specify that “investment farms” must be reported. All farms must now be reported. So the word “investment” can be removed from these sections.</p>	<p>157.o) Thank you for your comment. 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>
	157.p	<p>Students and families frequently reduce the value of their assets by credit card debt and educational loans. Please consider more specific language to prevent this – for example: “Net worth means the current value, as of today, of investments, businesses, and/or farm, minus debt related to those same investments, businesses, and/or farms. Do not reduce the value of an asset by credit card or educational debt. When calculating worth of an asset, use 0 for investments or properties with a negative value.</p>	<p>157.p) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.</p>
	157.q	<p>Asset Instructions (page 21)</p> <p>Since all farms are now reportable but some farm owners live in a home on their farm, please add an instruction that the home portion of the farm is not reportable. This could be something like this: “Investments do not include the home you live in, the value of the home on a farm that you live on (but do report the value of the working portion of the farm, ...</p>	<p>157.q) Refer to response for comment number 140.</p>
0161	158	<p>The instructions that allow the "other parent" to skip the income questions if they filed a joint tax return with the parent will prevent the other parent from answering the "income earned from work" question - and this value is necessary to properly calculate the employment allowance. In the attached document, I propose a different way to organize the questions on the FAFSA so that this question can be answered even if the parent and other parent filed a joint return together. In addition, this moves some of the instructions on the latter pages of the application into the question itself, where they are more likely to be seen.</p> <p>Suggestion: rearrange the “Tax Return Information” so that instructions for skipping portions of it will</p>	<p>158) Refer to response for comment number 157.k.</p>

resolve some of the issues above. Here's a graphic that shows how this might look.

Parent (and Other Parent) Income and Assets
 Answer the following questions about your child's parent and other parent and if they provided information earlier in the application. Provide each parent's information in the appropriate column. If only the parent provided information, enter the second column blank.

Parent Information
 Income earned from work
 IRS Form 1040-line 7 or 8 (1040-line 14)
 IRS Form 1040-line 7 or 8 (1040-line 14)
 Schedule 1-line 8
 Tax exempt interest income
 IRS Form 1040-line 8
 Adjusted gross income
 IRS Form 1040-line 11
 Income tax paid
 IRS Form 1040-line 28a

Other Parent Information
 Income earned from work
 IRS Form 1040-line 7 or 8 (1040-line 14)
 Schedule 1-line 8
 Tax exempt interest income
 IRS Form 1040-line 8
 Adjusted gross income
 IRS Form 1040-line 11
 Income tax paid
 IRS Form 1040-line 28a

Did the parent, the other parent, or both file a Schedule A, R, E, or H with their 2022 IRS Form 1040? Yes No Don't know

Did the parent, other parent, or both receive the earned income tax credit (EITC) on their 2022 IRS Form 1040? Yes No Don't know

By displaying these sections side-by-side and rearranging the order in which the questions are asked, it is possible to collect the income-earned-from-work information when it is required, and collect the joint information in just one place, without pointing to the instructions in the later pages of the application.

0162 159.a

Please consider splitting the status of the student/spouse/parent/other parent tax return into two questions – one of which addresses information from those who “did file” a return and the other which collects information from those who “will file” a return. Since the 2024-2025 FAFSA will not be available before the IRS’s deadline for those who request an automatic six-month extension for their return deadline, 2024-2025 presents a unique opportunity to test strategies that can lighten the burden on institutions when addressing late filers. In addition, since the new application process relies heavily on the IRS Direct Data Exchange (DDX) tool and late filers will not have access to this tool, a process can be created that allows schools to process those applications from late filers who have IRS approved reasons for not having filed their return, while collecting data from, and providing information to, those who do not have legitimate extensions.

For example, consider this possible question:

<begin question>

If you have not filed your 2022 tax return yet, what is the reason?

oI have not filed a tax return, and was not required to ask the IRS for an extension, due to my military service in a combat zone or other exempted area

oI have not filed a tax return because I live or work in an area that has been granted an extension beyond

159.a) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.

		<p>October 15, 2023 due to a Presidentially declared disaster oi have received an extension letter from the IRS to file my tax return after the October 15th, 2023 deadline and can provide a copy of this to the student's college if asked oi have not filed my tax return for a reason not listed above</p> <p>If you selected the second or third bullet, what is the due date for your tax return? XX/XX/202X</p> <p><end question></p> <p>If this question were on the application, institutions would know that people who selected the first, second or third bullet had (assuming they were honest), had legitimate and permitted reasons not to have filed a tax return, while the application (either on-line or through communication via mail by paper filers) could let people who select the fourth bullet know that their applications cannot be processed until their tax return has been submitted to the IRS – eliminating the school from this process. By collecting the due date of the tax return for legitimate extenders, the institution and the Department of Education would have a date at which to being looking for the applicant's data from the IRS.</p>	
	159.b	I also suggest that for 2025-2026 and later, the FAFSA be released on the day after the IRS's deadline for those who apply for the automatic extension to October 15th, so that there will be no applicants or family members who have not filed their return, but still have time to do so before the IRS's deadline passes.	159.b) Thank you for your comment. Please refer to comment 136.o .
0163	160.a	<p>The U.S. Department of Education ("ED") recently released drafts of the updated Federal Student Aid Application material – these included the proposed 2024-2025 Free Application for Federal Student Aid ("FAFSA") form and the FAFSA Submission Summary (formerly known as the Student Aid Report). We are writing to express our concern and disappointment that information about voter registration is not included in any portion of these materials. President Biden issued a groundbreaking Executive Order on March 7, 2021 Promoting Access to Voting ("Voting Access EO"). The FAFSA process is an ideal place to integrate voter registration and accomplish the goals of the Voting Access EO.</p> <p>Young people are much less likely to be registered to vote than older Americans, and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. We urge the Department to:</p> <ol style="list-style-type: none"> 1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, after students and families see the confirmation page. 	160.a) Refer to response for comment number 144.a .
	160.b	2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov.	160.b) Refer to response for comment number 144.a .
	160.c	3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form ("NMVRF") through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be	160.c) Refer to response for comment number 144.a .

		provided with all FAFSA Submissions Summaries sent through the mail.	
	160.d	<p>4. Ensure all appropriate forms and/or instructions are available and provided in multiple languages in recognition that many households primary language may not be English (especially in multiple generation households) and prospective students will need to be able to translate this information to their parent/guardian as appropriate.</p> <p>We appreciate the opportunity to provide these comments regarding the 2024-2025 FAFSA. We strongly urge the Department to make these recommended changes and make it easier for students to receive opportunities to register to vote and update their voter registration.</p> <p>Sincerely,</p>	160.d) Thank you for your comment. The Department of Education plans to add language support resources on StudentAid.gov to assist customers in completing the FAFSA form.
0164	161.a	<p>The U.S. Department of Education (“ED”) recently released drafts of the updated Federal Student Aid Application material – these included the proposed 2024-2025 Free Application for Federal Student Aid (“FAFSA”) form and the FAFSA Submission Summary (formerly known as the Student Aid Report). We are writing to express our concern and disappointment that information about voter registration is not included in any portion of these materials. President Biden issued a groundbreaking Executive Order on March 7, 2021: Promoting Access to Voting (“Voting Access EO”). The FAFSA process is an ideal place to integrate voter registration and accomplish the goals of the Voting Access EO.</p> <p>Young people are much less likely to be registered to vote than older Americans, and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. We urge the Department to:</p> <ol style="list-style-type: none"> 1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, after students and families see the confirmation page. 	161.a) Refer to response for comment number 144.a.
	161.b	<ol style="list-style-type: none"> 2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov. 	161.b) Refer to response for comment number 144.a.
	161.c	<ol style="list-style-type: none"> 3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail. <p>Right now, timely action by the Department of Education is essential. If ED does not begin the process now, millions of college students and their families could miss out on their opportunity to vote in the 2024 election.</p> <p>ED must follow through on the Administration’s commitment to integrate voter registration into the financial aid process by adding information to the Free Application for Federal Student Aid (“FAFSA”). This</p>	161.c) Refer to response for comment number 144.a.

		<p>action can make a real difference. If ED integrates a high-quality voter registration opportunity for the college students they serve, it could generate millions of new voter registrations annually.</p> <p>We appreciate the opportunity to provide these comments regarding the 2024-2025 FAFSA. We strongly urge the Department to make these recommended changes and make it easier for students to receive opportunities to register to vote and update their voter registration.</p> <p>Sincerely,</p> <p>Clarissa Unger Executive Director Students Learn Students Vote Coalition</p>	
0165	162	<p>Please return the Living Arrangements to the FAFSA. As stated in other comments, and by NASFAA, having institutions request an additional form adds another barrier to the students. In addition, institutions will not be able to provide a better estimate for living expenses, and will be dealing with a lot of requests for adjustments; which again adds an extra barrier to students as well as delay in receiving funds.</p>	162) Refer to response for comment number <u>1</u> .
0166	163.a	<p>I am writing on behalf of the West Virginia Higher Education Policy Commission and Community and Technical College System to share concerns we have with the U.S. Department of Education's (ED's) proposed changes to the Free Application for Federal Student Aid (FAFSA).</p> <p>West Virginia currently has one of the lowest college-going rates in the country, with only 46.4 percent of graduating seniors in the class of 2022 going on to pursue education or training after high school. There are varying factors contributing to this low rate, but one of the biggest hurdles we consistently hear is that students believe higher education is unaffordable. However, with state-sponsored financial aid, which - combined with federal support including the Pell Grant - makes college an affordable option for any student, no matter their background.</p> <p>The first step to unlocking these funds (both federal and state aid from WV) is the FAFSA. The FAFSA has historically been a complicated form that students and their families often need help completing. ED's proposed changes to the form in the spirit of simplification, we fear unintended consequences that will prevent high-need West Virginia students from completing the form - and from accessing money needed for their education.</p> <p>Our concerns include the following:</p> <ul style="list-style-type: none"> •New data collected for research only: The proposed FAFSA adds questions about applicants' sex, race, and ethnicity, none of which have any bearing on their eligibility for financial aid. These questions (numbered 11 and 12) are clearly listed as being "used for research purposes only," so we believe they 	163.a) Refer to response for comment number <u>73.c</u> .

		are unnecessary for the intended use of the form and should be removed.	
	163.b	<p>●Addition of farms and small businesses: The FAFSA revisions include the additional requirement that families report the net worth of a family farm or small business. We believe this will make it even more difficult for students in rural areas to pursue college, as it could be too difficult to value farms or small businesses and the exclusion of such assets could result in more middle-income students being eligible for aid.</p>	163.b) Refer to response for comment number 51.a .
	163.c	<p>●Requirement of both parents' signatures: We fully support having income information imported into the FAFSA directly from the IRS and understand the importance of parents giving consent for their IRS information to be released to the Department of Education, but we also understand there are many situations where it is difficult for a student to obtain a parent signature. Having both parents' signatures is a new requirement of the simplified FAFSA and we believe it will impede many of our students from being able to complete the form.</p> <p>West Virginia students already face a number of challenges when it comes to pursuing and accessing education or training after high school. As you know, our state has faced a drug misuse epidemic that has resulted in more of our young people than ever before being raised by someone who isn't a biological parent. These students are often juggling their own jobs and helping to raise their siblings, and accessing all the information they need to determine if they qualify for financial aid for college can be a significant impediment to their futures.</p> <p>I understand that the Department of Education has discussed delaying the launch of the new FAFSA from October 1, 2023 to as late as the end of the year. This tightened time frame will already make it even more challenging for students looking to pursue money for college next year, so I hope these concerns can be reviewed as urgently as possible.</p>	163.c) Refer to response for comment number 28 .
0167	164.a	<p>The U.S. Department of Education ("ED") recently released drafts of the updated Federal Student Aid Application material – these included the proposed 2024-2025 Free Application for Federal Student Aid ("FAFSA") form and the FAFSA Submission Summary (formerly known as the Student Aid Report). I am writing to express my concern and disappointment that information about voter registration is not included in any portion of these materials. President Biden issued a groundbreaking Executive Order on March 7, 2021 Promoting Access to Voting ("Voting Access EO"). The FAFSA process is an ideal place to integrate voter registration and accomplish the goals of the Voting Access EO.</p> <p>Young people are much less likely to be registered to vote than older Americans, and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. We urge the Department to:</p> <ol style="list-style-type: none"> 1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, after students and families see the confirmation page. 	164.a) Refer to response for comment number 144.a .

	164.b	2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov.	164.b) Refer to response for comment number 144.a.
	164.c	<p>3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail.</p> <p>Realizing the full potential of this vital EO is one of the most important things President Biden and the leaders of federal agencies can do to promote voting rights among college students, and doing so would leave a lasting legacy on our democracy. We urge ED to take immediate action to integrate voter registration into the FAFSA process to ensure all eligible college students and their families have access to the ballot box.</p> <p>At New Era Colorado we have spent decades working to make elections more accessible for young people in the state of Colorado. We believe that including voter registration information in the FAFSA is an important step to enfranchising voters to participate in a democracy that they have been left out of.</p>	164.c) Refer to response for comment number 144.a.
0168	165.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	165.a) Refer to response for comment number 1.
	165.b	<p>The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases.</p> <p>These two questions are a necessity when trying to streamline and be as transparent as possible.</p>	165.b) Refer to response for comment number 1.
0169	166.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another	166.a) Refer to response for comment number 1.

		request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	
	166.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases. These two questions are a necessity when trying to streamline and be as transparent as possible.	166.b) Refer to response for comment number <u>1</u> .
0170	167.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	167.a) Refer to response for comment number <u>1</u> .
	167.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases. These two questions are a necessity when trying to streamline and be as transparent as possible.	167.b) Refer to response for comment number <u>1</u> .
0171	168.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	168.a) Refer to response for comment number <u>1</u> .
	168.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases. These two questions are a necessity when trying to streamline and be as transparent as possible.	168.b) Refer to response for comment number <u>1</u> .
0172	169.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate	169.a) Refer to response for comment number <u>1</u> .

		cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	
	169.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases. These two questions are a necessity when trying to streamline and be as transparent as possible.	169.b) Refer to response for comment number <u>1</u> .
0173	170.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	170.a) Refer to response for comment number <u>1</u> .
	170.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases. These two questions are a necessity when trying to streamline and be as transparent as possible.	170.b) Refer to response for comment number <u>1</u> .
0174	171.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	171.a) Refer to response for comment number <u>1</u> .
	171.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases.	171.b) Refer to response for comment number <u>1</u> .

		These two questions are a necessity when trying to streamline and be as transparent as possible.	
0175	172	Please add the housing portion back to the FAFSA.	172) Refer to response for comment number <u>1</u> .
0176	173.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	173.a) Refer to response for comment number <u>1</u> .
	173.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases.	173.b) Refer to response for comment number <u>1</u> .
0177	174.a	It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	174.a) Refer to response for comment number <u>1</u> .
	174.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases. These two questions are a necessity when trying to streamline and be as transparent as possible	174.b) Refer to response for comment number <u>1</u> .
0178	175.a	I'm concerned that the student housing question has been removed from the FAFSA. We are now being tasked to put together an accurate cost of attendance for the student, and this makes this task more difficult. This will create more burden on the students as well as the administrators in order to properly gather information in order to meet the requirements for other federal mandates and laws. The intent has been to simplify the FAFSA process and ask as few questions as possible, however, omitting the housing question makes things far less simple.	175.a) Refer to response for comment number <u>1</u> .
	175.b	Also, the question regarding Work Study is also necessary as that is also an omission that creates more burden on the institution and offices, as well as the student as it becomes more difficult to package	175.b) Refer to response for comment number <u>1</u> .

		students w/o this knowledge.	
0179	176.a	"It is concerning to see that the student housing choice question has been removed from the FAFSA. This question is a key data piece that financial aid administrators absolutely need to put together an accurate cost of attendance and to package a student correctly. If the question is ultimately left off of the final form, the burden to collect this additional piece of information from all financial aid students will be another barrier when aid offices often have to do more with less. The burden will not only lie with financial aid offices, but also for the student who has to complete yet another form or respond to another request pertaining to their aid eligibility. While I understand the intention to simplify the FAFSA process and ask as few questions as possible, the missing housing choice question is a large oversight and will cause more work for everyone.	176.a) Refer to response for comment number <u>1</u> .
	176.b	The removal of the question that asks if students are interested in work-study will also be labor intensive on both staff and students. The school will have to assume it in the award package and this will cause students to have to inquire about work-study or loan increases. These two questions are a necessity when trying to streamline and be as transparent as possible."	176.b) Refer to response for comment number <u>1</u> .
0180	177.a	A few concerns with the new FAFSA: The financial aid administrators across the entire United States are VERY concerned about the housing question being removed. It may seem like a simple question, however, the answer to that question allows us to create an accurate budget for students which we are required to have in order to award a student. Not having this question on the FAFSA is putting another barrier in front of students because it is going to require colleges to create another form for students to complete in order for us to collect that data.	177.a) Refer to response for comment number <u>1</u> .
	177.b	The other question we are concerned about is the removal of the "Interested in FWS" question. Again, we rely on that question to identify students who are interested in the FWS program. It will put a much larger burden on the financial aid administrators to just randomly award any student FWS whether they are interested or not. This will cause a lot of awarding and cancelling which will take a lot of resources that we could use elsewhere. Again, another barrier for students as we will need to create something for students to let us know they are interested.	177.b) Refer to response for comment number <u>1</u>
	177.c	We do appreciate that instead of 3rd and 4th Year being separate it is now combined as other undergraduate. This should reduce the number of students that incorrectly identify as 5th year other. However, I think it's confusing for credential students because the last option lists MBA, M.D. so it may feel like no option applies to them.	177.c) Thank you for your comment. Additional guidance will be added to help applicants better answer this question.
	177.d	The new signature process seems complicated. There are a LOT of moving parts with the new process requiring ALL to obtain an FSA ID and relying on an email to "invite" them to provide information on the FAFSA. Many parents out there may or may not use an email. These emails may go to the "junk" folder and so they may not even see the invitation. There is a new phrase out there in the FA community that instead of this being "FAFSA Simplification" it is becoming "FAFSA Complication." It's very sad that it takes 40 years to have such a huge overhaul on the FAFSA and most of the items that the Department of Ed are saying is simplifying the process, is really	177.d) Thank you for your comment.

		making it more complicated for students and their parents and creating some additional barriers for students.	
0181	178	<p>May 23, 2023 Docket ID ED-2023-SCC-0053</p> <p>U.S. Department of Education, Office of Postsecondary Education 400 Maryland Ave. SW, Second Floor Washington, DC 20202</p> <p>Thank you for allowing Western Governors University (WGU) the opportunity to provide input on the Dear Colleague Letter (DCL) regarding the 2024-2025 Free Application for Federal Student Aid (FAFSA).</p> <p>WGU is a private, nonprofit institution of higher education based in Salt Lake City, Utah, that offers online, competency-based education programs to students nationwide. WGU is accredited by the Northwest Commission on Colleges and Universities and currently serves more than 144,000 full-time students with approximately 318,000 graduates in all 50 states.</p> <p>As an institution wholly dedicated to student success, WGU advocates for public policies that enable and empower innovation, ensure academic quality, increase affordable access, support accountability, and prioritize student-centered support and graduate outcomes. WGU endorses responsible measures that improve educational quality and remove barriers for all learners.</p> <p>WGU comments on the 2024-2023 Free Application for Federal Student Aid (FAFSA)</p> <p>WGU applauds the Department's efforts to make the FAFSA simpler and more accessible for all. The ability to import IRS tax info is an important change, as it will help students by eliminating unnecessary complexities and significantly reducing completion time.</p> <p>However, WGU agrees with the National Association of Student Financial Aid Administrators (NASFAA) and others who have expressed concern over the absence of a housing choice question. Removal of this question makes it difficult for financial aid officers to estimate a student's total costs. It may also require institutions to implement additional processes to gather this information. As NASFAA stated in its letter from March 16, 2023: "Removing the housing choice question from the FAFSA both defeats the purpose and goes against Congress' intent for FAFSA simplification."</p> <p>We urge the Department to consider adding a housing question to the revised FAFSA, as it will help</p>	178) Refer to response for comment number <u>1</u> .

		<p>ensure a more simplified, accurate process. Thank you for your consideration of our comments.</p> <p>Respectfully submitted, /robert.collins@wgu.edu/</p> <p>Bob Collins Vice President, Financial Aid Western Governors University</p>	
0182	179	<p>The “creation of a roles-based solution” requiring that parents log in with their FSA ID in order to complete the FAFSA online poses a significant barrier to low-income, first-generation students served by college access programs. Low-income, first-generation students have significant difficulty merely obtaining the necessary financial documents from their parents to complete the FAFSA, due to parental mistrust of the process.</p> <p>Moreover, many parents of low-income, first-generation students do not regularly use email and require significant support to complete the FSA ID registration process. Coordinating with parents of low-income, first-generation to create a FSA ID is difficult for both counselors and students due to work commitments and the digital access issues faced by low-income, first-generation families. Requiring that parents of low-income, first-generation students have to login to complete their own section on the FAFSA when they have already provided the necessary income documentation for the children to complete the FAFSA application poses an unnecessary burden on low-income, first-generation students seeking to complete the FAFSA. Parents have already provided consent to using their financial information to complete the FAFSA when they provided their financial documents to their child; there is thus no need to add this additional mandatory step to require parents to complete the sections relevant to them on the FAFSA.</p>	179) Refer to response for comment number <u>2</u> .
0183	180.a	<p>I am writing on behalf of Northcentral Technical College to request amendments to the FAFSA Simplification Act.</p> <p>First, we strongly urge your support of the Family Farm and Small Business Exemption Act as introduced by Congressman Mann (H.R. 1250) and its companion bill introduced by Senator Ernst and Tester (S. 1237). This bill would restore the exclusion of the net worth of family farms and small businesses in the SAI calculations (as defined under the current EFC formula).</p> <p>The requirement within the FAFSA Simplification Act to report the net worth of a family farm or small business on the FAFSA and treat it as an asset in the calculation of a student’s financial aid eligibility will negatively impact eligibility of middle and lower-income students, many of whom had previously been eligible for federal or need-based aid. A dependent student from a family of four with a parental income of \$60,000 and a reported small business or family farm net worth of \$1 million would have an EFC of \$7,626 with the existing needs analysis formula. Under the new formula, the Student Aid Index (SAI) would be \$41,056. Students who were previously eligible for need-based aid based on the previous</p>	180.a) Refer to response for comment number <u>51.a</u> .

		<p>definitions of assets will likely become ineligible to receive the same assistance when their SAI is calculated, negatively impacting their ability to pursue and/or complete their degree.</p> <p>Farms and businesses differ from other liquid assets that could easily or quickly be sold for cash to contribute to a student's education. The assets that contribute to the net worth of a family farm or business include items that are used to produce the products they sell. Assets such as grain and feed inventories, market livestock, breeding livestock, machinery and equipment, buildings, and farmland for a farm or equipment, trademarks or patents, and land for a small business do not give an accurate account of a family's available contribution. Farm families and small business owners may be forced to decide between liquidating assets and borrowing against these assets to support the education of their children.</p> <p>As a community and technical college in rural Wisconsin, we anticipate that a number of our students whose parents have a family farm or own a small business will be negatively impacted by this change and may be forced to drop out or forgo college altogether. We ask that the Department continue to exclude the net worth of small businesses and family farms from asset calculations on the FAFSA.</p>	
	180.b	<p>Second, we urge your reconsideration of the exclusion of the student housing choice question, beginning with the 2024-25 FAFSA. Financial Aid Offices rely on this question to put together an accurate cost of attendance and to package financial aid offers accurately. The cost of attendance is a necessary component of student aid eligibility and it cannot be constructed accurately without knowing a student's housing choice, creating the need for an additional survey to applicants to obtain this information. We would urge the Department to reconsider the removal of this question and to reinstate it back to the FAFSA for the release of the 24-25 FAFSA.</p>	180.b) Refer to response for comment number <u>1</u> .
0184	181	<p>Please add housing question back to FAFSA so financial aid offices do not need to come up with a separate way to capture this information. This places undue burden on students and financial aid professionals to take additional action when the information could be provided through FAFSA submission.</p>	181) Refer to response for comment number <u>1</u> .
0185	182.a	<p>The Honorable Miguel Cardona Secretary of Education U.S. Department of Education 400 Maryland Avenue S.W. Washington, D.C. 20202</p> <p>Re: Docket ID Number ED-2023-SCC-0053</p> <p>The Association of Community College Trustees (ACCT) appreciates the opportunity to provide comments on the draft 2024-25 Free Application for Federal Student Aid (FAFSA).</p> <p>ACCT is a non-profit educational organization of governing boards, representing more than 6,500 elected and appointed trustees who govern over 1,200 community, technical, and junior colleges in the United States and beyond. Trustees have the fiduciary responsibility of their institution and responsibility for</p>	182.a) Thank you for your comment. Please see response <u>25.b</u> .

		<p>hiring the college leadership. Further, trustees are leaders in their community and are concerned with the health of the community college sector, both in terms of finances and student success.</p> <p>As community colleges disproportionately educate students from low-income backgrounds, it is crucial that the FAFSA work well for our students. To that end, ACCT offers the following comments on the draft FAFSA:</p> <p>State Deadlines: Given the shift in the FAFSA opening date, many states are re-evaluating their state deadlines. The state deadlines should be reviewed regularly and updated as needed so that students receive the most up-to-date information. This is particularly important for community college students as they are more likely to complete the FAFSA just prior to enrolling and to enrolling at non-traditional start dates.</p>	
	182.b	<p>Demographic and Parent Education Status: These two questions should be labeled as “for research purposes only,” specifying that the information is not shared with the colleges listed on the FAFSA. These questions may be discouraging to first-generation students who question whether or not they belong on campus.</p>	<p>182.b) Regarding the parent education status question: no change. Schools may use this question to determine eligibility for other types of aid.</p> <p>Regarding the demographic question, it is already stated that the answers will be used for research purposes only.</p>
	182.c	<p>1. The options under demographics should be alphabetized.</p>	<p>182.c) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.</p>
	182.d	<p>The definition of “attended” college should be included in the parent’s education status.</p>	<p>182.d) Thank you for your comment. The text for this question will be revised.</p>
	182.e	<p>3. Small Businesses and Investment Farms: There is significant concern among the rural community college sector about the change in treatment of small businesses and farms. For farms in particular, the financial structure that requires borrowing at the beginning of the year and paying back that loan over the course of the year means that the debts against the farm fluctuate. ACCT is supportive of colleges working with Congress to re-evaluate how small businesses and farms are included in the asset calculation. For the Fiscal Year 2024-2025, the Department of Education could:</p> <p>1. Remove or define “investment” as part of the farm.</p>	<p>182.e) Refer to response for comment number <u>140</u>.</p>

		<p>2. Include in the instructions that the family home should not be included, even if it is physically located on the farm.</p> <p>Provide further instruction on how to calculate assets.</p>	
	182.f	<p>3. Housing Question: While a small percentage of community college students live in on- campus housing, many campuses do provide housing to at least a portion of their students. For this reason, it would be beneficial for community college financial aid offices to receive information as to whether a student plans to live in on-campus housing.</p>	182.f) Refer to response for comment number <u>1</u> .
	182.g	<p>Foreign Languages: The FAFSA Simplification Act expanded the FAFSA to include the 11 most common languages spoken by English language learners and their parents. The instructions on the FAFSA should include additional information for receiving support in those languages. Future versions of the FAFSA should be available in all 11 languages.</p>	182.g) Refer to response for comment number <u>160.d</u> .
	182.h	<p>3. Mailing Cost: Given the required changes to the FAFSA to include separate financial information for spouses and each parent, plus the reformatting for an easier-to-use form, has resulted in a paper FAFSA that is multiple pages longer than the previous paper FAFSA. The mailing instructions should include whether additional postage is required for 14 pages using an average weighted paper. This is particularly important for the currently incarcerated population who now have access to Pell Grants and are required to complete the paper form.</p> <p>Thank you again for the opportunity to provide these comments. If there are further questions, please contact Carrie Warick-Smith, Vice President-Public Policy, ACCT at cwsmith@acct.org.</p>	182.h) This change will be made as requested.
0186	183	<p>Can you please add the housing question back to FAFSA? Financial aid offices have used this data point for years to flesh out different costs for students based on their housing preferences. Forcing schools to create a method to get this same information that has always been available through other means seems to be a step backward.</p>	183) Refer to response for comment number <u>1</u> .
0187	184.a	<p>The U.S. Department of Education (“ED”) recently released drafts of the updated Federal Student Aid Application material – these included the proposed 2024-2025 Free Application for Federal Student Aid (“FAFSA”) form and the FAFSA Submission Summary (formerly known as the Student Aid Report). We are writing to express our concern and disappointment that information about voter registration is not included in any portion of these materials. President Biden issued a groundbreaking Executive Order on March 7, 2021 Promoting Access to Voting (“Voting Access EO”). The FAFSA process is an ideal place to integrate voter registration and accomplish the goals of the Voting Access EO.</p> <p>Young people are much less likely to be registered to vote than older Americans, and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up</p>	184.a) Refer to response for comment number <u>144.a</u> .

		to date, and exercising their right to vote. We urge the Department to:	
	184.b	1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, after students and families see the confirmation page.	184.b) Refer to response for comment number 144.a.
	184.c	2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov. 3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form ("NMVRF") through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail. We appreciate the opportunity to provide these comments regarding the 2024-2025 FAFSA. We strongly urge the Department to make these recommended changes and make it easier for students to receive opportunities to register to vote and update their voter registration. Sincerely, The Civics Center	184.c) Refer to response for comment number 144.a.
0188	185.a	May 23, 2023 Department of Education Office of the Secretary 400 Maryland Avenue, SW Washington, DC 20202 Submitted via regulations.gov Re: FAFSA Revisions, FR Document #2023-06169 Dear Secretary Cardona and Department of Education Staff: Thank you for your service and leadership to our nation and for the opportunity to submit comments as requested by the Department of Education (ED) regarding FAFSA revisions. If the proposed revisions occur, as we believe they should, we welcome the opportunity to provide further input to assist in this important task. We submit this letter on behalf of Evermore, a national nonprofit dedicated to improving the lives of bereaved children and families. Evermore was founded to help raise awareness of the consequences of bereavement on society, advance sound research that drives policy and program investments, and advocate on behalf of bereaved and orphaned students, including those who use the FAFSA form to	185.a) Refer to response for comment number 1.

submit critical financial information necessary to receive financial aid and matriculate into postsecondary education.

Evermore applauds all ED stakeholders for determining revisions to the FAFSA were warranted, particularly the revisions pertaining to orphanhood. Over 13 million students rely on the FAFSA form to determine their eligibility for federal, state, and institutional aid. These applications amount to over \$120 billion in aid being distributed to students in need via grants, low-interest loans, and work-study programs.¹ Indeed, FAFSA has increased access to higher education, with an estimated 70 percent of undergraduates filing a FAFSA application,² yet many barriers continue to exist for those from traditionally underprivileged and marginalized backgrounds. As data reveal, when these demographic factors intersect with the hardships inherent to parental bereavement, it is a recipe for disaster.

As access to higher education continues to expand, it is critical to consider the ways parental bereavement impacts students. Bereavement—or the loss of a loved one by death—is one of the most traumatic stressors a person endures, and evidence from American institutions of higher learning show as many as 30-40 percent of undergraduate students are within the first year of grieving the loss of a close friend or family member, with nearly half being within merely two years of experiencing a significant loss.³ Scholars in this area have referred to college student bereavement as a “silent epidemic” that negatively impacts students socially, academically, and developmentally.⁴

According to data as recent as December 2022, it is estimated that 2.2 million children in the United States are parentally bereaved.⁵ We define parentally bereaved children as children and adolescents under the age of 18 who have experienced the death of a parent with whom they cohabitated, including biological, step, and adopted children. Note that we do not differentiate between children who have lost one versus both parents. Also note that for a child under the age of 18, it is rare for both parents to die. This definition conforms with those of other domestic and international policy institutes and organizations (e.g., UNICEF), in addition to U.S. government agencies (e.g., CDC).

Extensive evidence indicates bereavement is a critical risk factor for a host of serious conditions. For example, students who have lost a parent face significant adversity, including hardships that impact their physical and mental health, social stability, and financial security. Furthermore, when compared to their peers who had not lost a parent, children who had been parentally bereaved showed a higher risk of being depressed, involved in violent crimes, experiencing academic failure, attempting suicide, suicide,

misusing alcohol and substances, and dying prematurely from any cause.⁶

This topic is even more relevant, given the COVID-19 pandemic. The CDC estimates one child lost a parent or caregiver for every four COVID-19-associated deaths, translating to nearly 250,000 children having lost a parent or custodial grandparent in the U.S. alone.^{7,8} These heart-wrenching figures suggest there is a greater need now than in years prior for the ED to consider the impact bereavement and orphanhood has on students.

Moreover, we recognize a major goal of FAFSA is to expand access to education, which inherently means providing need-based aid to those from disadvantaged backgrounds. Many of the students who receive such aid included historically marginalized populations, including those previously defined as racial or ethnic minorities. For example, 70.6 percent of Black full-time students at 4-year institutions received need-based federal aid, according to a 2011 report from the National Center for Education Statistics.⁹ Similarly, trends in parental bereavement disproportionately impact historically marginalized student populations.

Consider these quick facts on parental bereavement among students in the U.S.¹⁰:

- Since 2000, **Indigenous children** have been parentally bereaved at a higher rate than every other racial or ethnic group, reaching an all-time high of 2.2 times the national rate in 2021.
- **Black children** have experienced a nearly 20 percent increase in annual rates of childhood bereavement since 2000 and an increase of 51 percent since 2013. Their 2021 rate—579 newly bereaved children per 100,000—is second only to that of Indigenous children.
- From 2000 to 2021, the annual rate of childhood bereavement among **Asian children** increased

by more than 22 percent.

- From 2019 to 2020, **Hispanic children** experienced a 40 percent increase in the annual rate of childhood bereavement, the greatest single-year percentage increase in the past 20 years.
- Between 2000 and 2020, the annual rate of parentally bereaved **White children** has steadily increased, from 341 to 499 per 100,000—a 50 percent rise.

Given the aforementioned, we strongly encourage the Secretary and Department staff to consider the following when revising the FAFSA:

- 1) Adding an orphanhood-specific question to the FAFSA.
- 2) Revising the definition of orphanhood to be congruent with those used by domestic and international policy institutes, organizations, and government agencies.
- 3) Working with states and school districts to develop bereavement policies that support students

who are grieving and mourning their losses.

Specifically, we suggest the following.

1) Adding an orphanhood-specific question to the FAFSA. To best support parentally bereaved and orphaned children, the ED must first collect specific data on this phenomenon to understand the unique needs and adversities these students face. At present, there is no national collection system that aggregates annual data on bereavement, such as demographics (e.g., trends by race and geography), cause of death, and family kinship. Thus, bereavement as a public health and social concern remains invisible, despite yielding the potential for significant medical, behavioral, and economic hardship among college and university students.¹¹

One notable difference between primary and secondary institutions and higher education is the way they identify at-risk children. In primary and secondary settings, schools may offer parents and guardians the ability to report a child's bereavement status during the annual student registration process, much as

	<p>they can report health concerns (e.g., allergies), guardians' occupational status (e.g., parents who are in the military), and academic challenges (e.g., dyslexia). However, in the post-secondary educational landscape, institutions must rely on students self-reporting the death of a parent or primary caregiver—and as prior research has shown—many are averse to self-disclosing such incidence.</p> <p>Worse yet, the vast majority of colleges and universities lack student-specific bereavement policies.¹² This means the self-disclosure of parental loss remains solely in the hands of the bereaved student, forcing them to contact individual professors, department chairs, deans, and other administrators to request excused absences, deadline extensions, and other accommodations. For many, and particularly among traditionally marginalized populations, the power differential alone is enough to warrant avoiding disclosure.</p> <p>This overall lack of structure leads to critical data slipping through the cracks. Depending on who died in the household, additional insecurities may ensue, resulting in food, housing, financial, and healthcare insecurity. These insecurities, along with the demands of academic rigor and competition, can accumulate to impair a student's ability to enroll and succeed academically.</p> <p>Despite these alarming scenarios, there is currently no mechanism through which institutions of higher education can identify grieving students and refer them to campus-based resources.¹³ We feel strongly that revising the FAFSA to enable the collection of critical data on the parentally bereaved will help the ED grasp the adversities orphaned children face when entering higher education, allowing these issues to be more readily addressed and supporting the preparation these students require for short- and long-term success.</p>	
185.b	<p>2) Revising the definition of orphanhood to be congruent with those used by domestic and international policy institutes, organizations, and government agencies. Currently, ED's proposed revision to FAFSA defines orphanhood as "at any time since the student turned 13, they were an orphan (no living biological or adoptive parent)." Defining orphan status when a student turns 13 is not congruent with other United States governmental agencies, as well as policy institutes, both domestic and abroad. The department should define orphanhood as the phenomenon of a child under 18 losing <i>one or both parents or primary caregivers</i>.^{14,15}</p>	185.b) Thank you for your comment. The Department of Education uses this question as a criterion for dependency determination. The FAFSA Simplification Act did not redefine an orphan for this purpose.
185.c	<p>Working with states and school districts to develop bereavement policies that support students who are grieving and mourning their losses. According to ED, more than 73 million students attended schools in 2020. This figure includes students at every level, from those in kindergarten to those in postsecondary institutions (e.g., colleges and universities).^{16,17} As concurrent mortality epidemics sweep the nation,</p>	185.c) Thank you for your comment. This issue either falls outside the scope of the FAFSA form or is too nuanced to be properly addressed in this context.

		<p>students are not immune from the toll that death has taken on families. By some estimates, 40 percent of university students have experienced the death of a loved one in the previous two years;¹⁸ however, while the number of bereavement leave policies aimed at supporting students in higher educational settings has increased in recent years, they are the exception, not the rule, (e.g., Purdue University's GAPS policy).¹⁹</p> <p>In closing, we believe the Department of Education must act on behalf of grieving students and families, and we thank you for the opportunity to submit these comments.</p> <p>Joyal Mulheron Red Douglas Evermore, Executive Director Evermore, Policy Advisor</p>	
0189	186.a	<p>Attached please find comments on the 2024-25 draft FAFSA from the National Association of Student Financial Aid Administrators</p> <p>May 23, 2023</p> <p>Director of the Information Collection Clearance U.S. Department of Education 400 Maryland Avenue SW LBJ, Room 224-84</p> <p>Washington, DC 20202-4537</p> <p>To whom it may concern:</p> <p>Docket ID ED-2023-SCC-0053</p> <p>On behalf of the National Association of Student Financial Aid Administrators (NASFAA), we respectfully submit to the U.S. Department of Education (ED) our comments on ED's proposed 2024-2025 Free Application for Federal Student Aid (FAFSA®) (Docket ID ED-2023-SCC- 0053).</p> <p>NASFAA's membership consists of more than 29,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every 10 undergraduates in the United States.</p> <p>We applaud ED for its updated paper FAFSA design and for releasing the draft FAFSA only a month later</p>	<p>186.a) Thank you for your comment. The updates that are included in each year's application release take a considerable amount of input and effort by many parties to define the requirements, ensure the accuracy of the functionality, develop the system, test the system, and resolve any issues, apply security protocols, and clear the application with OMB. Because of the extensive amount of time needed to complete all these activities, the date on which application screenshots are provided via the FAFSA Preview Presentation is the earliest that is possible.</p>

		<p>than in past years, despite an anticipated delay of the FAFSA launch by as much as three months. Early knowledge of how FAFSA questions will be worded is helpful to financial aid administrators as they prepare to educate students and train staff about the FAFSA changes for next year.</p> <p>While we appreciate the supplemental user online experience scenarios to help understand the flow of the online application, we urge ED to share more of the online FAFSA experience as soon as possible, since more than 99% of applicants complete the online form. Understanding a demonstration site is unlikely to be available until close to the FAFSA launch date, screenshots that demonstrate the FAFSA process flow and exact wording of questions and help text are critical to financial aid administrators conducting financial aid nights for prospective students and should be released no later than September 1, 2023.</p>	
186.b	<p>General Comments and Questions on Process and Burden</p> <p>We appreciate ED's efforts over the past several years to reduce the number of applications selected for verification by improving its selection algorithms. ED has previously indicated that it will abandon those algorithms for the 2024-25 aid year and rely instead on a random selection process for verification until it learns more about the impacts of FAFSA simplification on data reporting errors. Given the institutional verification cap was removed in 2021 and that ED states in the accompanying PRA statement institutions must verify all applications the FPS selects for verification, we ask ED to confirm the percentage of applications it plans to select in 2024-25 and to reinstate the institutional verification cap until new algorithms are developed.</p>	186.b) Thank you for your comment. This issue either falls outside the scope of the FAFSA form or is too nuanced to be properly addressed in this context.	
186.c	<p>Also related to burden estimates, we ask whether ED's estimate of the number of applicants who will complete a paper FAFSA accounts for the potential increase in paper applicants due to newly established federal student aid eligibility for students enrolled in Prison Education Programs and the likelihood the will complete paper forms due to limited access to computers and mobile devices.</p>	186.c) Thank you for your comment. The Department of Education is not anticipating any significant changes in paper FAFSA submission volumes.	
186.d	<p>Finally, ED notes in its burden estimates of 1.53 hours for dependent students and .77 hours for independent students to complete the online FAFSA that they lowered burden estimates due to the new FUTURE Act Internal Revenue Service (IRS) Federal Tax Information (FTI) direct data transfer. We ask if ED offset that burden reduction by taking into account the time it will take applicants, their spouses, their parents, and/or stepparents to complete the new consent process for sharing FTI. The new roles-based FAFSA completion process and collecting consent from all involved parties will add to completion time, which ED must factor into its burden estimates.</p>	186.d) The Department of Education's applicant burden model considers the average time it will take to prepare, complete and submit the FAFSA form to compute the individual burden estimate. For more information, please refer back to Supporting Statement Part A question 12.	
186.e	<p>Paper Draft FAFSA</p> <p>Since we do not have the benefit of previewing the online form at this time, we ask ED to apply all of our comments related to the paper FAFSA to the online form. And because the Incarcerated Applicant Form is identical to the FAFSA, our comments here apply to that form as well.</p>	186.e) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.	

	<p>We offer the following recommendations to improve the form's usability and correct errors:</p> <ul style="list-style-type: none"> ● The Consent to Retrieve and Disclose Federal Tax Information (FTI) section includes: "The redisclosure of my FTI to any future 2024-25 FAFSA forms for which I elect to participate (e.g., if I elect to participate in my child's <emphasis added> FAFSA form or to complete my own FAFSA form after participating in another FAFSA form)." <p>We recommend ED updates this to include references to stepchildren and spouses since stepparents and students' spouses may also be providing consent to disclose FTI.</p>	
186.f	<p>Question 1, SSN, gives the instructions: "The student's full name exactly as it appears on their Social Security card." but later in the same section the student has the option to provide an ITIN if they do not have an SSN. The instruction line needs to account for the fact that not everyone will report an SSN. We suggest ED amend the language to read: "The student's full name exactly as it appears on their Social Security card, if they have a Social Security Number. If no Social Security Number, enter Individual Taxpayer Identification Number (ITIN) below."</p>	186.f) This text is under revision.
186.g	<p>Question 5: ED should remove the "See 'Can I skip any questions'" line since Question 5 can not be skipped.</p>	186.g) This change will be made as requested.
186.h	<p>Question 6 includes the "See 'Can I skip any questions'" line, but the corresponding section on page 19 does not include instructions for when students can skip Question 6. We believe students should be able to skip Question 6 if they are independent by any of the criteria in Question 5. If so, ED should add Question 6 to the instructions on page 19 where it already states students can skip Questions 7 and 8 if they are independent.</p> <p>o Related, the instructions for skipping Questions 7 and 8 permit skipping those questions only if students are independent by age, marital status, or credential level. We believe students should be able to skip Questions 7 and 8 if they are independent by nature of any of the other independent student status criteria.</p>	186.h) Thank you for your comment. 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®).
186.i	<p>Question 8: We recommend ED add clarifying text instructing applicants that "unusual circumstances" are listed in Question 7. We offer the suggested change: "Are the student's parents unwilling to provide their information, but the student doesn't have an unusual circumstance listed in Question 7 that prevents them from contacting the parents or obtaining their information?"</p>	186.i) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
186.j	<p>Questions 11 and 12, Student Demographic Information & Student Race and Ethnicity: We recommend that ED add language that schools and states cannot see the applicant's answers. As noted in our 2023-24 FAFSA public comments, the assurance that the student's responses to this question won't affect aid eligibility alone is inadequate. Students could fear schools might use this information in the admissions process or in some other way unrelated to aid eligibility. It needs to be clear not only that it won't be used, but that the information is not even available to schools and states.</p>	186.j) Thank you for your comment. Regarding the suggested text for demographics and race sections, this change is being made. For the suggestion to move questions 11 and 12 -The layout of the form was designed with the

		<p>o We also recommend moving these questions to an earlier point in the FAFSA, such as after Question 1. As currently placed, these questions fall between other questions related to student eligibility and, even with explanatory language, give the impression they are tied to eligibility.</p>	<p>intent of asking the pertinent questions needed to determine student identity and contact information, dependency status, and whether any other contributors need to be a party to the form. Questions not used for those purposes appear later in the form.</p>
186.k	<p>Question 15, Parent Educational Status: We recommend that ED change the wording of this question to ask, “Did either of the student’s parents attend or complete college” and to give response options of “Neither parent attended college,” “One or both parents attended college, but neither parent completed college,” “One or both parents completed college,” and “Don’t know.”</p> <p>o This change would address the issue of different definitions of first-generation students among states and institutions, where some define first-generation as having parents who didn’t attend college and others define it as having parents who did not complete college.</p> <p>■ We do not believe ED is limited in asking only whether the student’s parents attended college, as is written in the legislation, because ED has already determined that it could ask the student’s gender and whether they are transgender, when the law only requires a question about the student’s sex.</p>	<p>186.k) This text is under revision.</p>	
186.l	<p>We ask why Questions 19 and 29 do not ask the same filtering questions about tax return type, as they do in the parent section.</p>	<p>186.l) Refer to response for comment number 59.b.</p>	
186.m	<p>Questions 19 and 27: We ask why there are only two options — “filed 1040 or 1040-NR” and “Did the student (spouse) earn income in a foreign country in 2022, or were they employed by an international organization that did not require them to file a tax return?” when Question 37 and Question 44 offer five additional options for tax filing status.</p>	<p>186.m) Refer to response for comment number 59.b.</p>	
186.n	<p>Questions 20, 28, 38, and 45 ask for “Income earned from work” and refer to line 1 of IRS Form 1040 or 1040-NR, but there is no single line 1 on those forms. Rather, there are line items numbered 1a-1i and 1z. ED should update this instruction to specify exactly which of those fields must be included as a response to this question.</p>	<p>186.n) Refer to response for comment number 13.a.</p>	
186.o	<p>Questions 20 and 38 ask for “Amount of college grants, scholarships, or AmeriCorps benefits reported as income to the IRS (Optional).” Understanding this is optional in that it won’t hold up completion/processing of the FAFSA, making it optional on the paper form seems to add little value and, in fact, could harm students who will skip the question when completing it could result in additional eligibility for student aid. We recommend removing the “optional” designation from the form. ED can still treat it as optional in processing without discouraging students from completing this question.</p> <p>We believe this question should also appear in the Student Spouse and Student Other Parent sections per FAFSA Simplification Act Section 483(a) (2)(B)(ii)(XX)</p>	<p>186.o) Thank you for your comment. This text is under revision.</p>	

186.p	Questions 20, 28, 38, and 45 indicate the figure applicants should enter as Income Tax Paid is IRS form 1040 line 25d. However, currently this figure is 1040 line 22 minus Schedule 2, line 2 (Excess Advance Premium Tax Credit Repayment Amount.) We do not believe the calculation of Income Tax Paid has changed in statute and ask ED to confirm this change is correct.	186.p) Refer to response for comment number 13.a .
186.q	Questions 20, 28, 38, and 45 instruct applicants to use IRS form 5498 to determine IRA and pension rollovers into a qualified plan. ED should add a line item from form 5498 for clarity.	186.q) Refer to response for comment number 13.a .
186.r	Questions 21 and 39 instruct applicants and their parent to report child support received for the last complete calendar year. Given that applicants may be completing the FAFSA in any one of three different calendar years, the amount of child support for the last complete calendar year may be very different based only on whether the FAFSA was filed on December 31 or January 1. This will add complexity and burden to the verification process since financial aid administrators would have to change their documentation requirements for every student based on when they completed the FAFSA. The law requires only that applicants report an annual child support amount. We recommend using the prior-prior year's child support received for consistency.	186.r) Refer to response for comment number 107.x .
186.s	Questions 22 and 40 ask for the net worth of businesses and investment farms. We recommend removing the word, "investment" and referring only to farms more broadly since the FAFSA Simplification Act no longer limits farm assets to be reported on the FAFSA to investment farms.	186.s) Thank you for your comment.
186.t	Question 21: ED should add the "See 'can I skip any questions'" line here since question 21 can be skipped.	186.t) Thank you for your comment. This question is required in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act Section 483(a)(2)(B)(XV)(aa).
186.u	Question 37 and Question 44 have a new tax filing option: "Either the parent earned income in a foreign country but still did not and will not file a foreign tax return or they were an employee of an international organization that did not require them to file a tax return. Such international organizations include, for example, the United Nations, World Bank, and International Monetary Fund." but there are no instructions for how to answer Question 38 and Question 45 if that response is selected. We recommend that ED add instructions for how to answer this question.	186.u) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
186.v	Question 37 and Question 44 instruct applicants, "If one of the options in the second column below is selected and the parent is unmarried, questions 38-40 can be skipped." We recommend changing the language to "right-hand column" for clarity.	186.v) Refer to response for comment 43 .
186.w	We urge ED to add back the student housing choice question. Institutions must know which students will live off campus so they can provide them with realistic housing estimates now that the methodology for calculating institutionally-owned housing cost estimates is so prescriptive. Without knowing where students plan to live, schools seeking to keep their costs of attendance consistent will be forced to use the institutionally-owned housing estimates for all students, potentially greatly over- or underestimating off-campus housing costs in the cost of attendance.	186.w) Refer to response for comment number 1 .

186.x	<p>We urge ED to add back the option for independent students to provide parental income information on the FAFSA. Health professions schools need parental income information for awarding both Health Resources and Services Administration (HRSA) Health Professions Student Loans (HPSL) programs and need-based institutional aid. If ED does not provide the option for applicants to provide this information, we ask that they work with HRSA to explain the burden their regulations place on health professions schools now that this information is not available on the FAFSA. We also ask, if applicants completed the paper FAFSA with parental income data, would ED provide that information on the ISIR?</p>	186.x) Thank you for your comment. The Department of Education is permitted only to ask questions that are required either (a) to aid in determining eligibility, (b) by the FAFSA Simplification Act, or (c) by the FUTURE Act.
186.y	<p>Paper Draft FAFSA Notes Section</p> <ul style="list-style-type: none"> ● In the “Which parent should include information?” section, ED instructs applicants, “If the parents are divorced or separated, answer the questions about the parent who provides the greater portion of the student’s financial support...” We believe this will lead to questions about a time frame for when the greater portion of support was provided since that may vary for applicants. ED should be clearer in the instructions on the time frame applicants should use. 	186.y) Thank you for your comment. 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®) form.
186.z	<p>The asset instructions have an error in the “Investments also include...” heading. The form says parents of dependent students should report qualified education benefits “...including all accounts owned by the student and all accounts owned by the parents for any member of the household.” However, the FAFSA Simplification Act changes the qualified education benefits to be reported as assets in 480 (f)(3)(B). ED should change the instructions to match the law that states parents of dependent students only report qualified education benefits as assets when “...the account is designated for the student...”</p>	186.z) This text is under revision.
186.aa	<ul style="list-style-type: none"> ● The Business/Farm Instructions are identical to the 2023-24 instructions despite the significant change to include small businesses and family farms. Families will have many questions about exactly what assets must be reported. Many people engage in farming activities but do not consider their property to be a farm, while others receive income from farming but do not engage in farming themselves. Further, many farm families reside on their farms and, because primary residences are exempt from reporting on the FAFSA, they need clear instructions on how to separate their residence and non-farm land from their farms. <p>○ There must be a clear way for families to establish whether their property is considered a farm for asset reporting purposes on the FAFSA. We recommend instructing families that if they own property for which they file an IRS Schedule E or F where they report any type of farm income, then the property in question is a farm since those schedules appear to capture all types of income or losses generated from farming. ED must also provide clear instructions about how to treat a primary residence that is on family farmland. Families that don’t own farms are able to exclude both the dwelling and the land it sits on from assets on the FAFSA under the primary residence exemption. We recommend ED use language such as “the land you/your family lives on that is not used for farming” to describe what can be excluded from asset</p>	186.aa) Refer to response for comment number 140 .

		reporting.	
186.ab	Incarcerated Applicant Form (IAF)	<p>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 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.</p> <ul style="list-style-type: none"> ● We recommend that ED edit language from the IAF introductory page that says “use this to apply for ... work-study and loans,” considering students completing this form won’t qualify for loans. 	186.ab) Refer to response for comment number 136.ae.
186.ac	We recommend that ED remove application deadlines for states that do not provide funding for incarcerated students.		186.ac) Refer to response for comment number 136.ae.
186.ad	We recommend that ED remove language instructing students to check with their high school counselor about other sources of aid and deadlines since high school counselors are likely not available to this population.		186.ad) Refer to response for comment number 136.ae.
186.ae	We recommend that ED remove references throughout the IAF that refer to living expenses and room and board since those costs are not part of the cost of attendance for incarcerated students.		186.ae) Refer to response for comment number 136.ae.
186.af	<ul style="list-style-type: none"> ● Several dependency options in Question 5 can likely be removed, such as: <ul style="list-style-type: none"> ○ “The student is currently serving on active duty in the U.S. armed forces for purposes other than training,” since an individual presumably cannot be incarcerated while serving on active duty in the US Armed Forces. ○ The student has children or other people (excluding their spouse) who live with the student,” since an incarcerated individual cannot have dependents living with them. 		186.af) Refer to response for comment number 136.ae.
186.ag	We recommend that ED remove Question 6 since an incarcerated student would not be considered homeless.		186.ag) Refer to response for comment number 136.ae.
186.ah	We recommend that ED remove Question 9, since family size would presumably always be 1 for this population.		186.ah) Refer to response for comment number 136.ae.
186.ai	<p>FAFSA Submission Summary</p> <p>We commend ED on the redesign of the FAFSA Submission Summary, previously known as the Student</p>		186.ai) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.

		<p>Aid Report (SAR). It is not only more visually appealing, but the name change better characterizes the purpose of the document. The new language in the FAFSA Submission Summary section at the top of Page 1 clearly explains what the form is, and should help applicants understand its uses.</p> <p>In the “Federal Student Aid Eligibility” section, the last sentence reads, “Your SAI is subject to change if you update or correct your FAFSA.” We recommend adding that the SAI can change as a result of verification. ED could use this language only on FAFSA Submission Summaries of students selected for verification. Adding that language will help prepare applicants for the possibility that their eligibility for student aid could change upon verification since this is a common area of confusion financial aid administrators have to resolve for students.</p>	
	186.aj	<p>Also in the “Federal Student Aid Eligibility” section, we ask for clarification about ED’s use of the language, “Based on your SAI, it appears that you may be eligible for a Federal Pell Grant of up to \$7,395...” Since Pell Grant eligibility will be determined largely based on federal poverty guidelines, most students’ SAIs will not determine their Pell Grant amounts. Will this language only appear on FAFSA Submission Summaries of students who are eligible for a Pell Grant by nature of the SAI?</p>	<p>186.aj) Thank you for your comment. 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>
	186.ak	<p>In the “Special or Unusual Circumstances” section, ED states in the first line, “If you or your family have experienced special or unusual circumstances that impact your ability to pay for school, you may be eligible for an adjustment on your FAFSA form.” We recommend adding language that an adjustment to the FAFSA could result in additional student aid eligibility. As written, students are unlikely to understand the potential benefits of adjusting information on the FAFSA and may not be inclined to report changes to their school.</p>	<p>186.ak) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.</p>
	186.al	<p>In the “Federal Student Loan Summary,” there appear to be fields for totals that do not have figures filled in under the FFEL and/or Direct Loans and Perkins headings. The “TEACH Grants Converted to Direct Loans” heading should also have a “Total Principal Balance” to match the above two headings.</p>	<p>186.al) The document in question is for illustrative purposes only.</p>
	186.am	<p>In the “Federal Student Loan Summary,” in the second paragraph, ED states, “If there is an amount listed for Federal Family Education Loan (FFEL) Program “Unallocated Consolidation Loans,” it is because we could not determine whether those balances were subsidized or unsubsidized,” but there does not appear to be a distinction between Direct Loans and FFEL in the “106mountt of Loans Outstanding.” If this is the case, the reference to FFEL should be removed, or the sentence should be reworded to: “If there is an amount listed as ‘Unallocated Consolidation Loans’ it is because we could not determine whether loans you borrowed under the Federal Family Education Loan (FFEL) Program were subsidized or unsubsidized.”</p>	<p>186.am) The document in question is for illustrative purposes only.</p>
	186.an	<p>In the “How to Correct Your Information” section, the first bullet reads, “The answer you provided is</p>	<p>186.an) Thank you for your comment. The</p>

		<p>printed in bold. If you find a mistake, enter the correct answer in the field.” We recommend adding clarifying language that applicants should enter the correct answer “in the field below the mistake” to avoid confusion.</p> <p>Conclusion</p> <p>We recognize the 2024-25 draft FAFSA is the product of significant time and effort by the Department to interpret and implement historic changes to how students apply for federal student aid. Smooth implementation is critical to achieving the goal of the FAFSA simplification legislation, especially considering the delayed launch date. We look forward to continuing to work with FSA toward a successful rollout of forthcoming FAFSA simplification efforts.</p> <p>We appreciate the opportunity to comment on this information collection. If you have any questions regarding these comments, please contact me or NASFAA Senior Policy Analyst Jill Desjean at desjeanj@nasfaa.org.</p> <p>Regards,</p> <p>Justin Draeger, President & CEO</p> <p>Jill Desjean, Senior Policy Analyst</p>	<p>Department of Education believes the current instructions provide adequate guidance.</p>
0190	187	<p>Can you please add the housing question back onto the FAFSA? Removing this question seems to cause more harm than good and will require financial aid administrators to develop new policies and practices to capture the same information that would be included on the FAFSA by default. Removing this component will only add more stress and tasks on students and administrators to accurately represent the cost of attendance by request additional documentation or information.</p>	<p>187) Refer to response for comment number <u>1</u>.</p>
0191	188.a	<p>The Honorable Miguel Cardona Secretary of Education U.S. Department of Education 400 Maryland Avenue S.W. Washington, D.C. 20202</p> <p>Re: Docket ID Number ED-2023-SCC-0053</p> <p>May 23, 2023</p> <p>We appreciate the opportunity to provide feedback on the draft 2024-2025 FAFSA, which was posted in the Federal Register on March 23, 2023. The attached comments are submitted by ScholHouse</p>	<p>188.a) Thank you for your comment. 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®) form.</p>

	<p>Connection, John Burton Advocates for Youth, and the Youth Law Center.</p> <p>We are pleased to partner with Federal Student Aid to ensure a smooth and effective implementation of the revised FAFSA form. Please do not hesitate to reach out to us if we can answer any questions or provide any assistance.</p> <p>Sincerely</p> <p>Comments on the Free Application for Federal Student Aid (FAFSA) Federal Register Number: 2023-06169</p> <p>Submitted by: Barbara Duffield & Jillian Sitjar, SchoolHouse Connection; Debbie Raucher, John Burton Advocates for Youth; Jasmine Miller & Jenny Pokemper, Youth Law Center</p> <p>Date: May 23, 2023</p> <p>Special Circumstances? Page 1</p> <p>We are pleased to see the notification of special circumstances in the first page of the application.</p> <p>Question 2 Page 5 Student Contact Information</p> <p>Directions regarding providing a mailing address for students who do not have a stable address</p> <p>In question 2, a student must provide their permanent mailing address. Information should be added to the “Notes” section on page 19/20 to provide instructions for students who lack a permanent address and are experiencing homelessness, as well as other youth populations who may experience frequent and unexpected changes of address, including migrant youth and foster youth.</p> <p>Proposed language: “If you are homeless or have no stable address, you can provide an address at which you can reliably receive mail. If you secure a permanent address during the school year, it is recommended that you change your mailing address to reflect this information.”</p>	
188.b	<p>Question 4 Page 6 Student College of Career School Plans</p>	188.b) This text is under revision.

		<p>Clarification of timing of degree receipt</p> <p>“When the student begins the 2024–25 school year, will they have their first bachelor’s degree?” could be misunderstood to mean that the student is pursuing their first bachelor’s degree. Adding the word “already” (will they already have their first bachelor’s degree) would minimize the possibility of confusion.</p>	
188.c	<p>Question 4 Page 6 Student College or Career School Plans</p> <p>Provide clarification for students who are/were dually enrolled</p> <p>Asking about the student’s college grade level, “First Year,” can be confusing for students that took dual enrollment or concurrent enrollment courses in high school. It would be clearer if information was added, noting that students who took dual enrollment or concurrent enrollment classes in high school are still considered First Year (freshmen).</p>	<p>188.c) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.</p>	
188.d	<p>Question 5 Page 6 Student Personal Circumstances</p> <p>Simplification and clarification of “ward of the court” and “in foster care”</p> <p>We recommend that “ward of the court” and “in foster care” be merged into a single question and that clarifications be made in the explanation. Question 5 of the FAFSA provides separate options for being a “ward of the court” or “in foster care.” These terms are generally interchangeable. If these are maintained as separate options, the instructions on page 20 should distinguish under what circumstances a student should use one versus the other to avoid confusion.</p> <p>Additionally, the “ward of the court” designation is used in some states to refer to youth in the juvenile justice system, which can lead to additional confusion. The explanation previously given on this topic stated that ward of the court was not meant to refer to situations in which a person was incarcerated, but this covers only a subset of youth involved with the juvenile justice system, most of whom are incarcerated only for short periods of time, followed by services and treatment in the community. This explanation should be clarified to state that being incarcerated, on its own, is not a ground for being considered a ward of the court, but that being incarcerated does not cancel out prior experience as a foster youth/ward of the court. A very large percentage of youth under 25 in the criminal or juvenile justice system are youth with prior child welfare experience. Guidance should ensure that these youth understand that they are still able to check the “in foster care after 13” box. Finally, the definition of ward of the court would be clearer if included the language from the FSA handbook, which references legal</p>	<p>188.d) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.</p>	

		<p>custody. A definition of legal custody would also be instructive.</p> <p>Example text could include:</p> <p>For FAFSA purposes, a youth is a dependent or ward of the court if the juvenile court has taken legal custody of the youth. Legal custody is generally understood to mean that the court has authority to make decisions on a child’s behalf. Typically, this refers to situations in which the youth was taken into child welfare (foster care) custody, the youth’s parents had their parental rights terminated, or the youth’s parents are deceased or incapacitated, and the court stepped in to take their place. If a youth is taken into juvenile court custody for purposes of incarceration, this alone does not qualify them as a “ward of the court” for the FAFSA but, importantly, it <i>does not disqualify</i> them from being a ward of the court <i>if other eligible circumstances apply</i>. A youth who was determined to be a “ward of the court” prior or subsequent to confinement could meet the definition and be considered an independent student for Federal financial aid purposes.</p>	
188.e	<p>Question 6 Page 6</p> <p>Student Other Circumstances</p> <p>Provide clarification</p> <p>We appreciate the Department’s efforts to implement provisions related to unaccompanied youth experiencing homelessness. However, we remain concerned about the timeline provided for when a student was experiencing homelessness. We request that the Department change “At any time on or after July 1, 2023” to “At any time during 2022 or 2023...” to conform to the same prior-prior year timeline used for income information and in the lead-in to questions 18 and 36. We believe this is permissible since the Higher Education Act does not specify a timeline. We also seek to clarify that, if an applicant has indicated yes to the homeless filtering question during their first time filling out the FAFSA, but selects “none of these apply” to the determination source, and is later determined to be homeless by their financial aid administrator, that such student will have their status pre-selected in a renewal application. Finally,he answer choice for a determination from a Financial aid administrator (FAA) appears to refer to a returning or transfer student who has a determination from an FAA at another institution, however this is not entirely clear. We recommend that the option to indicate a determination from a Financial aid administrator (FAA) be clarified to indicate a FAA from another institution.</p>	188.e) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.	
188.f	<p>Question 6 Page 6</p>	188.f) Thank you for your comment.	

	<p>Student Other Circumstances</p> <p>Provide additional explanation</p> <p>We recommend that the electronic version include help text explaining why a student would choose “none of these apply” and next steps. Information is listed on page 20. <i>“If you answered “Yes” but did not receive a determination from the persons listed, select “None of these apply” and contact the financial aid administrator at your college. This person can determine if you are “homeless” and, therefore, not required to provide parent information.”</i></p> <p>We further recommend that a link to the following document be shared as a voluntary template for institutions to assist students in requesting an unaccompanied homeless youth determination: https://schoolhouseconnection.org/financial-aid-for-unaccompanied-homeless-youth/#faa</p>	
188.g	<p>Question 7 Page 6 Student Unusual Circumstances</p> <p>Inclusion of parental incapacitation for dependency overrides</p> <p>Many of the situations listed as unusual circumstances are causes of youth homelessness. Therefore, we are very pleased to see the inclusion of language directing applicants to Question 6, unaccompanied homeless youth, if their circumstances resulted in lacking a safe, stable place to live. In addition, we recommend that parental incapacitation be included as a grounds for a dependency override. Parental incapacitation has traditionally been considered a ground for a dependency override. A student cannot meaningfully contact a parent who is in a coma or is otherwise incapacitated.</p> <p>An example of a situation in which this might be relevant would be a 20 year old with a single parent who becomes incapacitated in an accident or is committed to a mental health institution. Because the 20 year old is not a minor, they would not be placed in a guardianship or foster care, but they also would have great difficulty obtaining their parental tax information.</p>	188.g) Thank you for your comment. The examples included in Question 7 are not intended to be an exhaustive list of unusual circumstances.
188.h	<p>Question 9 Page 7 Family Size</p> <p>Clarification on the term family</p> <p>The terms family and family size should be described clearly so students are alerted that “family” includes more than just biological family members. Additional help text and/or information in the notes as well as training on the term is highly recommended. While the instruction states that an applicant should “Also</p>	188.h) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.

		include other people if they live with the student and the student will provide more than half of their support between July 1, 2024, and June 30, 2025,” this is not sufficient to provide a student a precise idea of who should and should not be included. For example, if a student is supporting their live-in boyfriend, with whom they have no formal “family” relationship, they would be confused given that they provide more than half the boyfriend’s support but a boyfriend does not meet the traditional definition of family.	
188.i	<p>Question 11 Page 7</p> <p>Student Demographic Information</p> <p>We are strongly supportive of the inclusion of non-binary and transgender identification options.</p> <p>Question 15 Page 8 Parent Education Status</p> <p>Specify all questions where parent education status does not impact eligibility for aid</p> <p>If “Parent Education Status” does not impact eligibility for aid, it is recommended that similar language is added to the student gender and race/ethnicity question. (<i>“The answer to this question does not affect aid eligibility and will not be used in any aid calculations.”</i>)</p>		188.i) No change. Some schools and states use this question to determine eligibility for certain types of aid.
188.j	<p>Question 18 Page 8 Federal Benefits Received</p> <p>Clarify the term “family”</p> <p>“At any time during 2022 or 2023, did the student or anyone in their family receive benefits from any of the following federal programs?”</p> <p>The terms family and family size should be described clearly so students understand which family members are included in this question and are alerted that “family” includes more than just biological family members. Additional help text and/or information in the notes as well as training on the term is highly recommended.</p>		188.j) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.
188.k	<p>Parent Section</p> <p>Beginning on Page 13</p> <p>Revise instructions</p> <p>We recommend that instructions be revised so that a student who is independent or asking for an</p>		188.k) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.

		<p>unusual circumstances determination understands that they do not need to fill out the Parent section.</p> <p>Proposed instructions: "Some students may not need to provide parental information based on their responses to Q 5, 6, or 7."</p>	
	188.l	<p>FAFSA Submission Summary</p> <p>Clarification of the distinction between "special circumstances and unusual circumstances"</p> <p>On the FAFSA submission summary, the distinction between Special or Unusual Circumstances on page 2 should be clarified. We recommend stating that the presence of a "special circumstance" may qualify the student for an adjustment to their award amount and that the presence of an "unusual circumstance" may qualify the student to submit the FAFSA as an independent student.</p> <p>This section should also explain that all institutions are required to have a policy for how to address both Special and Unusual Circumstances and provide relevant information on how to follow up. We further recommend that the FAFSA submission for a provisional independent student clearly states that they have submitted as a provisional independent student due to an unusual circumstance and what steps they and the institution must take in order to finalize their FAFSA.</p>	188.l) Thank you for your comment. 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®).
0192	189	<p>My concern is with two parents needing an FSAID. I understand the regulation to have them approve their taxes being used. Step-parents at times are unwilling to provide their information to help out a step-child. This may hinder a student using Financial aid.</p>	189) Thank you for your comment. A spouse will only need to be a party to the form if the student or parent did not file a joint tax return with their current spouse.
0193	190	<p>Question 22 and question 40</p> <p>This question does not allow farm families to show the amount of support that they are able to provide as they would have to sell their land or equipment in order to use that asset to pay for their child's tuition.</p>	190) Refer to response for comment number 51.a .
0194	191.a	<p>The Hope Center at Temple University appreciates the opportunity to comment on the 2024-25 FAFSA. We look forward to working with the Department to implement these changes.</p> <p>May 23, 2023</p> <p>U.S. Department of Education 400 Maryland Ave. SW, LBJ, Room 224-84, Washington, DC 20202-4537 Washington, DC 20202-8240.</p> <p>Re: Agency Information Collection Activities; Submission to the Office of Management and Budget for</p>	191.a) Refer to response for comment number 107.a .

	<p>Review and Approval; Comment Request; 2024-2025 Free Application for Federal Student Aid (FAFSA), Docket ID: ED-2023-SCC-0053</p> <p>Dear Director of the Information Collection Clearance:</p> <p>The Hope Center at Temple University is pleased to comment on the 2024-25 Free Application for Federal Student Aid (FAFSA). After many decades of work to simplify federal financial aid, we are finally on the cusp of fully implementing the <i>FAFSA Simplification Act</i>. This overhaul will substantially benefit the nearly 18 million students and their families applying for federal financial aid annually. We recognize and appreciate the significant time, attention, and dedication of U.S. Department of Education (“Department”) staff and contractors in executing this once-in-a-generation reform and the redesign of the FAFSA.</p> <p>There are now 1.1 million fewer students enrolled in higher education today than in the fall of 2019 before the COVID-19 pandemic.¹ And the number of students considering stopping out of college has reached all-time highs.² We must begin to attract new students and their families to college—and retain existing students—by making higher education more affordable and providing streamlined access to grants, loans, and work-study. We urge the U.S. Department of Education (“Department”) to seize this opportunity to streamline financial aid processing by addressing some areas of concern with the draft 2024-25 FAFSA and related items.</p> <p>Overall Comments on Timeline, Process, and Consumer Testing We know that the Department understands the urgency of releasing the FAFSA form as soon as possible. It is also critically important to have a date certain for when the 2024-25 FAFSA period will open. Colleges, K-12 schools, college access professionals, and families need to plan, prepare, and begin to assist applicants accordingly. Most high school seniors will be on winter break for part of December, and many families will be taking time off from work when some would typically begin the FAFSA process. We request an announcement of the release date by no later than the start of the new award year—July 1, 2023.</p>	
191.b	<p>We also ask the Department to publish screenshots and a full demonstration site of the online FAFSA as soon as possible. While we greatly appreciate the time and effort that it took to publish the paper FAFSA for this public comment period, it is critically important to understand the full user experience. Concerns over the misalignment between public comment and the FAFSA development period in the past led Congress to require, in the <i>Higher Education Act of 1965</i> (HEA) Section 483(a)(4)(B), that public comment</p>	191.b) Thank you for your comment. The updates that are included in each year’s application release take a considerable amount of input and effort by many parties to define the requirements, ensure the accuracy of the

¹ National Student Clearinghouse Research Center. (2023, February). [Current Term Enrollment Estimates](#).

² Gallup and Lumina Foundation. (2023). [State of Higher Education Report 2023](#).

		would provide “adequate time to incorporate feedback prior to development of the application for the succeeding award year.” The preceding paragraph also requires consultation with stakeholders on an annual basis, and The Hope Center stands ready to offer assistance and feedback. We ask the Department to confirm that, for the 2025-26 award year, both the paper FAFSA and online user experience will be available during the public comment period.	functionality, develop the system, test the system, and resolve any issues, apply security protocols, and clear the application with OMB. Because of the extensive amount of time needed to complete all these activities, the dates on which the demonstration website and the FAFSA Preview Presentation screenshots are available are the earliest that is possible.
191.c		Finally, the <i>FAFSA Simplification Act</i> requires extensive consumer testing of the draft FAFSA and related materials and disclosures, including with “prospective first-generation college students, representatives of students (including low-income students, English learners, first-generation college students, adult students, veterans, servicemembers, and prospective students), students’ families (including low-income families, families with English learners, families with first-generation college students, and families with prospective students), institutions of higher education, secondary school and postsecondary counselors, and nonprofit consumer groups.” This consumer testing can reveal “pain points” and areas of confusion that impede applicants’ progression through the form. While we understand the significant operational constraints and lack of adequate funding for the Department, we ask for additional public information on consumer testing moving forward, including the timelines and how consumer testing will benefit the future design of the FAFSA.	191.c) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
191.d		<p>Cost of Attendance</p> <p>We understand that the Department has decided that all financial aid – including campus-based, state, and institutional aid (but possibly excluding emergency aid) – should be limited to the total cost of attendance (COA). This interpretation contradicts the HEA, as modified by the <i>FAFSA Simplification Act</i>, which prescribes a limitation to COA only for Pell Grants, Direct Loans, and TEACH Grants. In contrast, campus-based, state, and institutional aid are not limited to COA by the HEA. Unfortunately, the Department’s decision in this matter could significantly undermine the benefit of the negative Student Aid Index (SAI).</p> <p>The negative SAI intended to reflect the substantial expenses that many students and families with low incomes face, including caregiving and work obligations, and to help students avoid basic needs insecurity by providing them with additional financial aid for these expenses. Many students and families have income levels far below the Income Protection Allowance, but their Expected Family Contribution has historically been truncated at zero. As the National Association of Student Financial Aid Administrators correctly indicated, “the negative SAI establishes a framework to allow the very neediest students to receive aid in excess of the Cost of Attendance (COA) established by their school.”³</p>	191.d) The Department of Education has referred this suggestion to the appropriate business unit to review recommendations.

	<p>The formula specified in HEA Section 471 specifies that need is calculated as $(COA) - (SAI) - (other\ financial\ assistance)$. Under mathematical principles, when a student's SAI is negative, subtracting two negative numbers thereby results in addition, and the formula should show an increase in the student's need. This calculation was also the intent of Congress. The statute describes areas where a negative SAI is to be treated as zero but does specify this treatment in HEA Section 471 for the need calculation.⁴</p> <p>By establishing that a negative SAI shall be truncated to zero for the purposes of awarding campus-based, state, and institutional aid beyond COA, the Department has contradicted the HEA and curtailed potential benefits to students in the form of additional assistance. This constrains states and institutions from supporting students with the greatest financial need. While this issue is not specific to the form itself, it is substantially related and has significant implications for the functionality of the need-based financial aid determined by the FAFSA. We call on the Department to reverse its policy interpretation and align guidance with the statutory language as soon as possible.</p>	
191.e	<p>FSA ID & Multi-Factor Authentication</p> <p>With the introduction of a role-based process requiring unique FSA IDs, the FAFSA will have a secure process for obtaining consent from each applicant to share income information. However, we are concerned about the potential for technological difficulties that could make it difficult for students and families to proceed seamlessly through the form. When multiple family members must log in separately, there may be more instances where applicants can be interrupted from completing the form, which could introduce a drop-off for many families. Additionally, Internal Revenue Code § 6103(13)(F), as specified by the <i>FUTURE Act</i>, gives the option for just one taxpayer in a joint return – i.e. one member of a married couple – to provide consent for disclosure of the information, meaning the Department does not need to require an FSA ID and role for both parents in the case of a dependent student who has two parents with a joint return. We urge the Department to require only one FSA ID for joint filers, and hope the Department will follow up robustly with users who have not been able to complete the FSA ID process to provide them with assistance.</p>	<p>191.e) Thank you for your comment. The Department of Education implemented this change in accordance with the security and identity validation requirements of the <i>FUTURE Act</i>.</p> <p>A spouse will only need to be a party to the form if the student or parent did not file a joint tax return with their current spouse.</p>
191.f	<p>We also request that the Department publish the process for applicants without a Social Security Number (SSN) to obtain an FSA as quickly as possible and avoid creating any systems that appear unequal in nature for these applicants. The FSA ID registration process must provide clear and supportive instructions for anyone who is in this situation. It is critical that the Department take into account the understandable fear and mistrust that non-citizen parents may experience in filling out any part of the FSA ID or FAFSA process given the xenophobic rhetoric and policy environment across much of the United States.</p>	<p>191.f) Thank you for your comment. Additional guidance will be posted.</p>
191.g	<p>Finally, we ask ED to provide a wide range of multi-factor authentication (MFA) options that are not limited to cell or email and to ensure these options are both accessible for people with audio or visual impairments and minimize cognitive overload.⁵ Many email systems already have MFA and are quite</p>	<p>191.g) Thank you for your comment. The Department of Education has referred this suggestion to the appropriate business unit to</p>

		secure, and not all users have ready access to a phone. Students experiencing, or at risk of, homelessness may not have their own cell phone. Providing authentication that can be accessed via the internet, instead of only by phone, is essential. We encourage the Department to also offer third-party authenticator apps, QR codes, or Login.gov to fulfill the MFA requirement.	review recommendations.
191.h	Questions on the FAFSA Benefits received (questions 18 and 36): This question not only provides a pathway to simplifying the FAFSA process for applicants but, on the back end, can be used in efforts to connect such applicants with benefits they may be eligible for. Under HEA Section 483 (a)(2)(B)(ii)(XVII), the Secretary is authorized to add “ <i>any other means-tested program determined by the Secretary to be appropriate.</i> ” We urge the Department to add other federal benefits that could significantly improve the financial security of students and their families—including the Affordable Connectivity Program (ACP), Low-Income Housing Tax Credit, Child Tax Credit, Low Income Home Energy Assistance Program (LIHEAP), and American Opportunity Tax Credit or Lifetime Learning Credit(s). The ACP is linked to Pell Grant eligibility, and providing a more robust list of tax benefits would allow the Department to enhance student tax filing significantly.	191.h) 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.	
191.i	We also ask the Department to revise the term “ <i>Refundable credit for coverage under a qualified health plan (QHP)</i> ” to a more commonly understood description (e.g. “tax credit for health insurance under the Affordable Care Act”) and to add, following the Supplemental Nutrition Assistance Program (SNAP), the term “formerly known as food stamps.”	191.i) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.	
191.j	For the help text for this question, we recommend adding a note that applicants should base their answer on any “family” members they included in the calculation of the family size in question 9. And, we suggest including language that answering this question could make it easier for applicants to complete the FAFSA (by bypassing asset information) and could help the applicant obtain additional financial support, since they may be able to apply for these benefits. When applicants know the potential benefit of the question, they are more likely to answer it with greater accuracy.	191.j) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.	
191.k	Student other circumstances (question 6): We thank the Department for implementing the revisions to the questions related to homelessness and for their significant time and attention to this population of students. However, we remain concerned about the timeline provided for when a student was experiencing homelessness, which the HEA does not specify. We request the Department change “At any time <i>on or after July 1, 2023</i> ” to “At any time <i>during 2022 or 2023...</i> ” to conform to the same prior-prior year timeline used for income information and in the lead-in to questions 18 and 36. We also seek to clarify that, if an applicant has indicated yes to the homeless filtering question during their first time filling out the FAFSA, but selects “none of these apply” to the determination source, and is later determined to be homeless by their financial aid administrator, that such student will still have their determination of homelessness pre-selected in a renewal application.	191.k) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.	
191.l	<ul style="list-style-type: none"> Special circumstances note (first page): We commend the Department for placing the 	191.l) Thank you for your comment.	

⁵ LexDis – Accessible Technology for Learning. (2022, February). [Multifactor Authentication – Cognitive overload?](#)

		notification of special circumstances on the first page. We suggest the Department ensure this also appears prominently on the online FAFSA, and add language that indicates why an applicant would choose to notify their financial aid office in such circumstances, e.g. “ <i>you may be eligible for additional aid.</i> ” Otherwise, applicants may not understand that taking this extra step can benefit them.	
191.m	<ul style="list-style-type: none"> Unusual circumstances (question 7): We thank the Department for their collaboration in recent enhancements to the unusual circumstances text and guidance. We ask the Department to make the language used in this question the same as the text used elsewhere for consistency. For example, the Department can remove “and have not been adopted” where it appears twice, as such language does not appear in statute and is more restrictive than the HEA. Students can have similar circumstances with their adoptive parents, and the language could lead students who have been adopted to think they do not qualify for unusual circumstances erroneously. 	191.m) This text is under revision.	
191.n	In the case of parents who are incarcerated, please remove “contact with the parents would pose a risk to the student” as this limits the applicability of this category when parental incarceration, by itself, would interfere with the ability to access and complete the FAFSA—particularly the FSA ID process. We also ask the Department to replace the plural “parents” with the flexible “parent(s)” in each instance, given that students may only have one parent filling out the FAFSA.	191.n) Thank you for your comment. 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®).	
191.o	The Department should also specify in guidance that a student’s request for a determination of provisional independence will be honored 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, just like the standard for students who must obtain a determination of independence if they are unaccompanied and experiencing homelessness or at risk of homelessness.	191.o) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.	
191.p	Apply for a Direct Unsubsidized Loan Only (question 8): This question is not required by the HEA, will be used by a few applicants, and should be eliminated. As amended by the <i>FAFSA Simplification Act</i> , the HEA authorizes a student to pursue just a Direct Unsubsidized loan, but only as an alternative to the professional judgment process or in the case of the failure to be declared provisionally independent. The question is also likely to induce confusion relative to the new pathway for students who are eligible to claim unusual circumstances. Students would be better served by having a simpler FAFSA process with this question removed.	191.p) Thank you for your comment. This question is needed to determine the applicants who fall into this exception category and allow for this population to successfully submit the FAFSA form.	
191.q	State deadlines (page 2): We request that the Department review and confirm state financial deadlines and keep these deadlines up to date throughout the award year. As a result of the delay in the 2024-25 FAFSA period, some states are revisiting their deadlines. We also recommend that the FAFSA include informational links to a state agency website, if available, where students can find out more information about financial aid in their state. Finally, we ask the Department to minimize the term “ask your financial	191.q) Thank you for your comment. Please see response 25.b .	

		aid office,” which appears 25 times on this page, as directing students outside of the FAFSA process can interrupt the completion of the form.	
191.r		Demographic questions (questions 11 & 12): We strongly support the non-binary and transgender identification options and celebrate this change being fully integrated with the FAFSA. We recommend the Department move up questions related to sex/gender and race/ethnicity earlier in the form, alongside other demographic questions. In doing so, applicants will be less likely to be confused about how answering these questions does not affect a student’s federal financial aid (just like, for example, indicating any age over 24 years old or the state in which they live).	191.r) Thank you for your comment. The layout of the form was designed with the intent of asking the pertinent questions needed to determine student identity and contact information, dependency status, and whether any other contributors need to be a party to the form. Questions not used for those purposes appear later in the form flow.
191.s		We agree with the Department’s decision not to provide student-level data on sex/gender to states and institutions, given ongoing questions about the legislative environment in many areas, including transphobic attacks. We also suggest the Department add language to question 11 indicating that the information will not be provided to the college or state, to alleviate applicants’ concerns about using their data. However, there remains significant power in the visibility and research opportunities offered by aggregate or summary statistics. We, therefore, encourage the Department to provide aggregate (not student-level) statistics and associated cross-tabs on the total number of applicants by sex/gender and race/ethnicity to each state. Such data are also crucial for ongoing efforts to improve FAFSA completion. States should be able to obtain the total numbers and percentages of Black men or Latine women, for example, who complete the FAFSA in order to understand any potential equity gaps.	191.s) The Department of Education is researching all available options and has referred this suggestion to the appropriate business unit to review recommendations.
191.t		Contact information (questions 2, 26, 31, 43): We request the Department add help text near the term “permanent mailing address” to address situations in which an applicant is experiencing homelessness, which is defined as not having access to lacking fixed, regular, and adequate housing. An applicant in such a situation would otherwise not know how to complete the form appropriately.	191.t) Thank you for your comment. 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®) form.
191.u		Family size (questions 9 and 34): We request the Department include help text explaining what steps an applicant should take if their family size changes after they submit their FAFSA and due to planned or unplanned circumstances. Under HEA Section 480(k)(3) the Secretary is required to “provide procedures for determining family size in cases in which information for the taxable year used in determining the amount of need of the student for financial assistance under this title has changed or does not accurately reflect the applicant’s current household size...” An applicant who is pregnant or expecting or who otherwise experiences a change in their family size should be able to adjust this number later, especially if such adjustment would make the student eligible for additional Pell Grant or other aid. We also request that the Department establish a procedure for reconciling any differences between the family size	191.u) Thank you for your comment. The Department of Education believes the current instructions provide adequate guidance.

		indicated by the student, and the parent(s), such that if different numbers are used, the applicant can solve this discrepancy before the FAFSA is filed and before any consequences of verification.	
191.v	Foreign languages: The <i>FAFSA Simplification Act</i> requires the FAFSA to be available in the 11 most common languages. We understand the Department’s operational constraints at this time, including the inability to come into compliance with this requirement in 2024-25. Still, we request the Department provide help text in 11 (or more) languages on the online FAFSA that direct applicants toward free assistance with language translation and to indicate when additional languages will be made available. We also request that the Department confirm that the 2025-26 FAFSA will be available in the 11 most common languages.	191.v) Refer to response for comment number <u>160.d</u> .	
191.w	Housing question: We understand there are significant concerns in the financial aid community about the removal of the housing question. However, we think this is an opportunity to improve COA calculations going forward. There have been longstanding concerns about COA accuracy, and we have asked the Department to regulate this topic. ⁶ As we provided in our comments for the 2023-24 FAFSA, a student’s housing plan can also change significantly between the time they fill out the FAFSA and when they enroll. Financial aid offers often contain little transparency about how students can adjust their costs even if their circumstances change. The U.S. Government Accountability Office found that 55% of colleges do not provide a total cost of attendance that includes key direct and indirect costs in their financial aid offers, and 46% do not provide information on the costs of housing and meals. ⁷ Colleges should take multiple steps to understand students’ nontuition costs beyond their choice of housing, including their food, transportation, and child care needs. We ask the Department to consider creating a voluntary template or form that colleges can use to inquire about students’ non-tuition tuition costs and potential public and tax benefits that could assist them with these costs, similar to the Department’s leadership with the College Financing Plan.	191.w) Refer to response for comment number <u>1</u> .	
191.x	FAFSA Submission Summary and Confirmation Page We appreciate renaming the Student Aid Report into the FAFSA Submission Summary, which better reflects the use of the document. We ask the Department to clarify in which circumstances applicants can access the FAFSA Submission Summary and in what format. We also seek clarity on whether the FAFSA Submission Summary replaces both the SAR and the SAR Acknowledgement. And, we request the opportunity to view and comment on the confirmation page that applicants will see after submitting the FAFSA.	191.x) Thank you for your comment. The Department of Education is in the process of making updates and will provide guidance on how to obtain or request a copy of the FAFSA Submission Summary. The FAFSA Submission Summary will replace the SAR & SAR acknowledgement and, similar to the SAR, will always be accessible to the student online. In addition, some students will receive their FAFSA Submission Summary via paper when certain conditions are met.	
191.y	We recommend adding the following sections or language to the FAFSA Submission Summary:	191.y) Thank you for your comment. The FAFSA	

⁶ The Hope Center. (2023, April). [Coalition Letter to the U.S. Department of Education on Cost of Attendance](#).

⁷ U.S. Government Accountability Office. (2022, December). [Financial Aid Offers: Action Needed to Improve Information on College Costs and Student Aid](#).

	<ul style="list-style-type: none"> • A section that makes clear that a student could obtain additional aid through professional judgment. Applicants are otherwise unlikely to understand the potential benefits of adjusting information on the FAFSA and may not be inclined to report changes to their school. HEA Section 483(b) requires the Secretary to disclose information on professional judgment. The FAFSA Submission Summary, any confirmation page, and any follow-up emails are the appropriate places for this information to be provided to students. • A section that helps students obtain additional financial support through public benefits, tax benefits, and aid due to veteran or servicemember status. According to our national survey of nearly 200,000 students at more than 200 colleges conducted in the fall of 2020, <i>three in five</i> students (58 percent) do not have enough to eat or a safe and stable place to live, and 14 percent are experiencing homelessness.⁸ With record numbers of students facing basic needs insecurity, it is more important than ever to connect financial aid applicants with additional ways to meet their expenses. Creating a new section on these forms of support can also be used in part to fulfill the requirement in HEA Section 483(a)(3), clauses (iv) through (vi), for the Department to follow up with information on: <ul style="list-style-type: none"> ○ Federal means-tested benefits that the applicant did not indicate they receive, but for which they may be eligible, and relevant links and information on how to apply for such benefits; ○ Information on education tax benefits; and ○ If the student identified as a veteran, or as serving (on the date of the application) on active duty in the Armed Forces for other than training purposes, information on benefits administered by the Department of Veteran Affairs or Department of Defense, respectively. • A “to-do list” that specifies the next steps that students may need to take after submitting the FAFSA. For example, students may need to review and confirm a financial aid offer, respond to requests related to verification, complete a Master Promissory Note, complete supplementary processes related to special or unusual circumstances (if applicable), and respond to other inquiries from their financial aid office. If a student misses one of these steps, they may fail to get the financial aid they need to enroll and succeed in higher education. It is important to advise 	<p>submission summary mock-up included in the clearance package is intended to provide commenters with the general structure and layout of the form. Information included in the FAFSA Submission Summary is customized to the applicant based upon the information collected and returned during the processing of the form.</p> <p>The Department of Education will provide information to applicants on how to request a professional judgement and additional information for other federal benefits along with next steps in the FAFSA completion process.</p>
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⁸ The Hope Center for College, Community, and Justice. (2021). [The Hope Center Basic Needs Survey: Basic Needs Insecurity During the Ongoing Pandemic.](#)

		<p>students upfront of these steps, especially since the FAFSA is likely only the first step in a lengthy financial aid process.</p> <p>A link to vote.gov to register to vote or update voter registration information, including accompanying information. The Internal Revenue Service included such language in the Tax Year 2022 Instructions for the 1040 Form, and the U.S. Postal Service includes an interactive process for applicants to register to vote or update their registration as part of the change-of-address process. We also ask that, after the confirmation page, the Department a proactive prompt that asks applicants if they would like to register to vote, or update their registration, and then redirects applicants to vote.gov. Civic engagement benefits all communities, including financial aid applicants.</p>	
	191.z	<p>Finally, Under the Office of Management and Budget notice, the language indicates, “By answering question 23, and signing the FAFSA form, you give permission to the U.S. Department of Education to provide information from your application <i>to the college(s) listed in that question.</i>” This section should caveat that answers to the Demographic Questions in question 11 will not be provided directly to the college.</p> <p>Conclusion</p> <p>We again thank the Department once again for their work and attention to the development of this new and streamlined version of the FAFSA. We appreciate the opportunity to provide these comments regarding the 2024-24 FAFSA and look forward to working with you to implement these changes that will make it easier for students to obtain the resources they need to pursue higher education.</p> <p>Sincerely,</p> <p>Bryce McKibben Senior Director of Policy & Advocacy The Hope Center at Temple University</p>	191.z) This change will be made.
0195	192.a	<p>NASSGAP thanks the Office of Federal Student Aid for all the work done to implement the incredibly important updates to the FAFSA and to open doors for millions of future students. Many of NASSGAP’s members have submitted comments individually, often after an internal approval process. Based on past experience, however, we wanted to provide additional comments provided by our members that they were not able to deliver through official channels, perhaps due to approval delays (e.g., many state legislatures are in session and trying to finalize budgets) or simply do not have the bandwidth given the volume of aid awards they are trying to make for the upcoming academic year. What follows are comments from various NASSGAP members trying to give FSA additional insights into the praise states have for the new form, as well as concerns about the new form, potential unintended consequences. Additionally, some of the comments are more questions or suggestions, as we’re not able to review and comment on the e-FAFSA, which is what the vast majority of FAFSA completers will use. Skip logic may</p>	192.a) Thank you for your comment. 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®) form.

		<p>dictate a different approach than what is on the paper FAFSA.</p> <p>In the following comments, "I" or "We" refers to the NASSGAP member or state submitting the comment, not NASSGAP as a whole. Some members may have conflicting opinions. Providing these additional comments submitted by a member to us:</p> <p>In reference to Question 8 in the Student Section of the .pdf draft, we believe the heading preceding this question, "Apply for a Direct Unsubsidized Loan Only," will give the impression that the FAFSA is used to apply for an unsubsidized loan. Our department has always done our best to dispel the myth that the FAFSA is used as a loan application. Yes, there is an italicized note that says an FAA at the student's school will determine their eligibility, but we think the heading "Unable to Provide Parental Information" is more direct and causes less confusion.</p>	
	192.b	<p>We are hoping the "high school attended" (Question 17) will be a dropdown box on the e-FAFSA and that there will be a search tool by zip code or other similar approach to guide students to enter the correct high school rather than manually entering something that doesn't match your records or ours.</p>	<p>192.b) Thank you for your comment. The Department of Education is updating the online high school search feature to better assist customers and improve the accuracy of information collected and submitted on the Free Application for Federal Student Aid (FAFSA®) form.</p>
0196	193	<p>Submitted via. https://www.regulations.gov</p> <p>Kate Mullen, PRA Coordinator Strategic Collections and Clearance, Governance and Strategy Division Office of the Chief Data Officer Office of Planning, Evaluation and Policy Development 400 Maryland Ave. SW LBJ, Room 6W208B Washington, DC 20202-8240</p> <p>RE: Comment Request; 2023-2024 Free Application for Federal Student Aid (FAFSA) (Docket No. ED-2022-SCC-0024)</p> <p>To Whom It May Concern:</p> <p>On behalf of the Human Rights Campaign's more than three million members and supporters nationwide, I write in response to the Department of Education's ("the Department") request for public comments regarding the Department's proposal to update the Free Application for Federal Student Aid ("FAFSA") process. Unfortunately, recently released drafts of the updated FAFSA form do not appear to include information about voter registration, which is an important step to improving student civic engagement.</p>	<p>193) Refer to response for comment number 144.a.</p>

We believe that the Department is uniquely situated to support youth voter turnout and can provide a convenient and accessible platform for students to register to vote, and which will also eliminate the need for additional steps or paperwork.

Democracy thrives on the active participation of all of its citizens, including young people, whose participation in the electoral process ensures intergenerational equity and inclusivity. In casting their ballots, they play a crucial role in influencing policy priorities and shaping the political landscape. This is especially important for students, who possess unique insight and interest about issues like affordable and accessible education, student loans, and employment prospects in the labor market.

However, younger would-be voters face a myriad of challenges that prevent them from registering and casting their ballots. Young people may encounter difficulties navigating registration requirements and obtaining necessary identification documents. It may also be more difficult for young people to take time off of work to vote or to find reliable transportation to a polling place.

Obstacles are especially pronounced for young people who are from historically oppressed groups, like communities of color, LGBTQ+ people, and people with disabilities. Persistent legislative and regulatory actions designed to silence the voices of these marginalized communities have too-often succeeded. According to the U.S. Census Bureau, 77% of white eligible voters are registered to vote, in comparison to 69% of Black eligible voters, 63% of Native-American eligible voters, 64% of Asian-American eligible voters, and 61% of Latinx eligible voters.¹ Less than two-thirds of young people aged 18-24 are registered to vote - just 64% - which is an alarming 10 percentage points lower than all other age groups.² Historical and ongoing racism, economic constraints, and voter suppression explain many of these disparities, and federal action to address these issues continues to stall. The present-day reality is that voters are more vulnerable to discrimination now than at any time since the Voting Rights Act was signed into law nearly sixty years ago.

However, the Department and other federal agencies have powerful tools at their disposal to bolster protections for weakened voting rights. As President Biden highlighted in his Executive Order on March 7, 2021, Promoting Access to Voting ("Voting Access EO"), Congress has recognized that Federal, State, and local governments have a duty to promote the exercise of the fundamental right to vote.³ The Department can do that by expanding youth voter access to registration and election information in the FAFSA application process, via inclusion of a link to voter registration resources in the Student Aid Report ("SAR"). The Department can also issue comprehensive guidance to colleges and universities about their legal responsibilities to provide voter registration under the Higher Education Act ("HEA") and encourage

		<p>them to promote student civic engagement on campus.</p> <p>There is no single fix for increasing youth turnout in elections, but making the registration process easier and less restrictive is a critical part of the solution. By helping to reduce systemic barriers at the ballot box, the Department will encourage and empower young people to use their voice where it matters most. It is our hope that they will readily commit to doing so.</p> <p>We thank the Department for their consideration of this comment and our recommendations.</p> <p>Sincerely,</p> <p>Courtney Avant</p>	
0197	194.a	<p>1. Add voter registration information into both the electronic and hard copy of the FAFSA Submission family farm</p> <p>Summary.</p> <p>An easy step the Department of Education can take to provide access to voter registration information in the FAFSA process is to add information about voter registration to the FAFSA Submission Summary (formerly known as the Student Aid Report). This information should be added to both the electronic and the hard copy (paper) Submission Summary provided to applicants.</p> <p>The following represents some recommended language:</p> <p><i>Voter Registration</i></p> <p><i>Do you need to check or update your voter registration? Visit Vote.gov to register to vote and get information from your state election office about voter registration and eligibility. (Optional)</i></p> <p>There are several locations in the paper Submission Summary where this simple language on voter registration could be added. This could be added to the Federal Student Aid Eligibility section on page 1 of the paper Submission Summary immediately after the language providing additional information about IRS tax benefits, or at the end of the Comment section on page 2. This simple language should also be added to an analogous location in the online Submission Summary provided to applicants.</p>	194.a) Refer to response for comment number <u>144.a.</u>

	<p>The Vote.gov language in the online version of the Submission Summary should hyperlink directly to Vote.gov. Vote.gov is a resource maintained by the General Services Administration (“GSA”). As part of the voting access EO, GSA is working on some improvements to the Vote.gov interface.⁴ Currently, Vote.gov provides voter registration information, links and resources for all states and territories. The pending changes are focused on improving the user experience of Vote.gov – the registration information provided will remain the same and will continue to be maintained by GSA. This means with one brief section of text, the Department of Education would be able to provide access to relevant, authoritative voting information to all FAFSA applicants.</p> <p>In response to the EO, other federal agencies have included voter registration information in relevant resources provided to the public. For example, the IRS included similar language in the Tax Year 2022 Instructions for the 1040 Form.⁵ The Department of Education must follow the example of the IRS and add voter registration information to the FAFSA Submission Summary in compliance with the EO’s directive to expand citizens’ opportunities to register to vote.⁶</p> <p>⁴ Per the voting access EO, GSA is working on improvements to the interface with voter registration services provided on Vote.gov. EO, Section 5. <i>See, e.g.,</i> Comment on Federal Register Document #2021-12619 from the ACLU and Demos (Comment ID NIST-2021-0003-0147), <i>available at</i> https://www.regulations.gov/comment/NIST-2021-0003-0147.</p> <p>⁵ 1040 Instructions, Tax Year 2022, <i>available at</i> https://www.irs.gov/pub/irs-pdf/i1040gi.pdf.</p> <p>⁶ Vote.gov provides links to all state online voter registration systems. But this is not effective for all individuals because not all states have online voter registration systems, and in most states, an individual must have a valid state driver’s license or ID card to use these systems. As an alternative, Vote.gov</p>	
194.b	<p>2. Incorporate a Voter Registration Question into the FAFSA Online Application Process.</p> <p>To provide the most effective registration opportunity, a voter registration question and registration information must be integrated into the FAFSA online application. We know this is the most impactful option based on extensive experience with state government agencies that provide voter registration opportunities pursuant to the National Voter Registration Act of 1993 (“NVRA”).⁷</p> <p>Although legal restrictions limit the Department’s ability to incorporate voter registration information into</p>	194.b) Refer to response for comment number <u>144.a</u> .

the FAFSA online application *before* the application is submitted, the Department can and must provide voter registration information *after* the application is submitted. Information about registering to vote should be added to the confirmation page that an applicant sees immediately after they submit their application.

The voter registration information should be presented as a completely voluntary question, explicitly stating that voter registration is not a required part of the FAFSA application and in no way affects the determination of benefits. State agencies and the NVRA provide models for effectively doing this without interrupting the benefits application process. Based on these models, we urge the Department to prominently display the following language immediately after a FAFSA application is submitted:

If you are not registered to vote where you live now, would you like to register to vote? (Optional)

You should be registered to vote at your current residence, and therefore, should submit a voter registration application to update your address if you are not sure if your voter registration is current.

The voter registration application will provide the specific details about who is eligible to vote in your state, but be aware that in all states and the District of Columbia you must be a U.S. citizen to register to vote in federal elections.

provides access to the National Mail Voter Registration Form ("NMVRF"). This form can be used to register to vote in almost all states. See National Mail Voter Registration Form, U.S. Election Assistance Comm'n, available at <https://www.eac.gov/voters/national-mail-voter-registration-form>; see also 52 U.S.C. § 20505(a).

However, this form must be printed and many people do not have access to a printer, including many people with disabilities, people with lower incomes, younger and older people, and members of other marginalized communities. These are the same communities that have the lowest existing voter registration rates. Given the limitations of online voter registration and inequitable access to printers, the Department of Education should also offer to mail a copy of the NMVRF to FAFSA applicants who request it. The NMVRF could be sent with the Submission Summary whenever it is mailed to applicants. Offering an option to request a voter registration form through the mail is the only way to ensure that everyone is given a meaningful opportunity to register to vote.

⁷ 52 U.S.C. §§ 20501.

Applying to register to vote will not affect your federal student aid eligibility.

Yes, I would like to register. *By selecting this option, you will be redirected to Vote.gov where you can access voter registration information specific to your state of residency.*

The penultimate sentence in the recommended language above (“Yes, I would like to register.”) should be hyperlinked directly to Vote.gov. Providing this opportunity while applicants are still online will significantly increase the likelihood that they will register to vote.

Vote.gov has limitations for some individuals because of its reliance on online voter registration. Therefore, an option for obtaining a National Mail Voter Registration Form (“NMVRF”) through the mail should be provided in this process. Applicants should be asked if they want to receive a voter registration form in the mail in addition to being redirected to Vote.gov. Additionally, the NMVRF could be included with the Submission Summary.

3. There is a Significant Need to Provide Additional Opportunities to Register to Vote, Particularly for Young People.

The Department of Education has a unique opportunity to reach students and FAFSA users of all ages. Young Americans in particular are much less likely to be registered to vote than older Americans and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. Far too often, students face unnecessary barriers to exercising their right to vote. Students often move around and go to college in states that make it more difficult for them to vote. And citizens aged 18-25 have the lowest level of voter registration rates of citizens of all other age ranges.⁸ Integrating a voter registration opportunity into the FAFSA provides a unique opportunity to provide an additional voter registration opportunity to younger Americans.⁹

We know from the incredible success of the NVRA, which celebrates its 30th anniversary this year, that providing voter registration opportunities during the application process for other government benefits is highly impactful. The NVRA expanded access to the ballot and made it easier for millions of Americans to register to vote and update their registration by providing voter registrations opportunities through state

agencies such as motor vehicle departments and public assistance offices. For example, from 2006 to 2022, 3.5 million additional Americans completed voter registration applications due to effective NVRA-compliant voter registration services provided by state public assistance agencies.¹⁰

⁸ U.S. Census, *Voting and Registration in the Election of November 2020*, available at <https://www.census.gov/data/tables/time-series/demo/voting-and-registration/p20-585.html>.

⁹ In the National Study of Learning, Voting, and Engagement, a landmark study of U.S. college and university student voting, the median age of students was 21, and 70 percent of the students were under the age of 25.

¹⁰ Laura Williamson, Pamela Cataldo & Brenda Wright, *Toward a More Representative Electorate*, Demos, available at <https://www.demos.org/research/toward-more-representative-electorate>.

In no small part due to low voter registration rates, young people have low election participation rates. For example, although a record number of young people voted in the 2018 midterm elections, that turnout still represented only 28 percent of young people¹¹ and 40 percent of students overall.¹² In the 2014 election, a record-low 13 percent of youth turned out.¹³ Citizens who are 18 and 19 are even less likely to participate in elections. And young people with low incomes and young people of color have especially low rates of registration and voting.¹⁴

Integrating the recommended voter registration opportunities into the FAFSA process would have long lasting effects given what we know about the habit-forming nature of voting. A recent study found that voting in one election increases the probability of voting in a future election by 10 percentage points on average.¹⁵ This makes it all the more important that voting becomes normalized at an early age. Being registered also significantly increases the likelihood that a citizen will go on to vote. In 2008, 84 percent of registered youth cast a ballot.¹⁶ Providing students, particularly young students, with a meaningful opportunity to register or update their voter registration increases the likelihood that they will develop a lifelong pattern of civic engagement.

The underrepresentation of students in voter registration and turnout rates is not due to apathy. Many students want to engage in the political process but often face numerous systemic barriers. Some

students do not know how to register to vote for the first time, and many struggle to keep their voter registration address up to date. One of the most significant barriers to increased student voter participation is the transient nature of student life compared to the general population. The need for students to keep their voter registration up to date in order to fully participate has never been more crucial, especially given the recent proliferation of opportunities to vote by mail, and the fact that many jurisdictions will not count provisional

¹¹ 2018 Election Center, Center for Information & Research on Civic Learning and Engagement, Tufts University, available at <https://circle.tufts.edu/index.php/2018-election-center>.

¹² *Democracy Counts 2018: Increased Student and Institutional Engagement*, Institute for Democracy and Higher Education, Tufts University, available at <https://idhe.tufts.edu/resources/democracy-counts-2018-national-nslve-data>.

¹³ 2018 Election Center, Center for Information & Research on Civic Learning and Engagement, Tufts University, available at <https://circle.tufts.edu/index.php/2018-election-center>.

¹⁴ *Broadening Youth Voting*, Disparities in Youth Voting, Center for Information & Research on Civic Learning and Engagement, Tufts University, available at <https://circle.tufts.edu/our-research/broadening-youth-voting#disparities-in-youth-voting>.

¹⁵ Yael Bromberg, *Youth Voting Rights and the Unfulfilled Promise of the Twenty-Sixth Amendment*, 21 U. Penn J. Const. Law, 1105, 1112 (2019) (citing Thomas Fujiwara, Kyle Meng & Tom Vogle, *Habit Formation in Voting: Evidence from Rainy Elections*, 8 AM. ECON. J. 160 (2016); see also Alan S. Gerber, Donald P. Green & Ron Shachar, *Voting May Be Habit-Forming: Evidence from a Randomized Field Experiment*, 47 AM. J. POL. SCI. 540 (2003); Alexander Coppock and Donald P. Green, *Is Voting Habit Forming? New Evidence from Experiments and Regression Discontinuities*, 60 AM. J. OF POL. SCI. 1044 (2016)).

¹⁶ *Midterm and Presidential Elections are Different for Youth*, Center for Information & Research on Civic Learning and Engagement, Tufts University, available at <https://circle.tufts.edu/latest-research/midterm-and-presidential-elections-are-different-youth>.

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ballots cast in the wrong precinct. Therefore, even students who are already registered would benefit from receiving voter registration services as a part of the FAFSA application process.

That's why we are calling on you to take action today in support of President Biden's voting access EO. One of the most impactful ways the federal government could contribute to improving voter registration rates is by integrating an offer of voter registration into the FAFSA application process as recommended above. From 2019 to 2020, 17.7 million students filed a FAFSA, which included approximately two-thirds of all undergraduate students.¹⁷ Significant numbers of students of color submit a FAFSA application every year: 83% of Black students, 74% of Hispanic students, 54% of Asian students, and 77% of Native American students complete the FAFSA.¹⁸ Moreover, 73% of students with low incomes complete the FAFSA.¹⁹ Of these, more than half are eligible for Pell grants, which are generally awarded to those with family incomes below \$30,000.²⁰ This data makes clear that the FAFSA process provides a uniquely meaningful opportunity to reach voter-eligible populations with some of the lowest voter registration rates.

We appreciate the opportunity to provide these comments regarding the 2024-2025 FAFSA. We urge the Department to expeditiously implement these recommended changes to make it easier for students to register to vote and update their voter registration.

Sincerely,

**American Civil Liberties Union Campaign Legal Center Campus Vote Project
Demos**

Fair Elections Center

Healthy Democracy Health People Initiative

League of Conservation Voters

National Urban League

The Hope Center for College, Community, and Justice The Leadership Conference on Civil and Human Rights

		<p>¹⁷ FAFSA Application Statistics, <i>available at</i> https://www.savingforcollege.com/article/fafsa-application-statistics#:~:text=Almost%2018%20million%20students%20file,the%20impact%20on%20financial%20aid.</p> <p>¹⁸ <i>Id.</i> ¹⁹ <i>Id.</i></p> <p>²⁰ Over 60 percent of Pell Grant recipients have family incomes below \$30,000 a year. See President's FY 2023 Budget Request for the U.S. Department of Education, Congressional Justifications Volume I, Student Financial Assistance, p. 19 (2022), <i>available at</i> https://www2.ed.gov/about/overview/budget/budget23/justifications/o-sfa.pdf.</p>	
0198	195	<p>The New Jersey Higher Education Student Assistance Authority (HESAA) respectfully requests the Department (ED) to include the NCES code for the student's high school on 2024-25 ISIRs. In addition, we request that ED help students to properly report their high school on question 17, by ensuring that the 2024-25 FAFSA offers students a drop-down list of high school names based on the City and State the student enters in response to question 17, and then in the back-end processing assign a NCES code to the student's selected high school and include this code on the ISIR generated from the student's FAFSA submission.</p> <p>New Jersey HESAA supports community and secondary school-based efforts to encourage FAFSA completion through multiple outreach initiatives, including data-sharing agreements with high schools. Pursuant to the terms of these agreements, HESAA matches high school student data against the ISIRs that HESAA receives from ED, which enables HESAA to provide updates to participating high schools on the FAFSA status of their students. The success of this match depends on including the NCES high school code on the ISIR. If we could only use the high school name, even with additional city identifiers, this process would not be as precise, as some high school names are similar to the names of other high schools in New Jersey, and this variation could introduce errors into the matching process.</p> <p>Currently, the 2023-24 FAFSA allows for students to identify the high school of attendance via a drop-down list. However, many students use the free-form field to type in their high school name instead of selecting a school from the drop-down list. We request that ED make it mandatory (not optional) on the 2024-25 FAFSA for the student to fill in the City and State in which their high school is located, as well as the name of the High School, when they respond to question 17. In many cases students use mobile phones to complete their FAFSAs and the search results can display many high school names. Students viewing these search results on small screens may not scroll to the next page to find their high school; in many cases, students give up on using the drop-down search and instead type in the name of the high school manually. To address this concern, the 2024-25 FAFSA should display results generated from the</p>	<p>195) Thank you for your comment. The Department of Education is updating the online high school search feature to better assist customers and improve the accuracy of information collected and submitted on the Free Application for Federal Student Aid (FAFSA®) form.</p> <p>The NCES code will continue to be included on the ISIR.</p>

		drop-down search that are narrowed based on the city and state selected, and then after students select their high school, the FAFSA should display the selection and require students to agree that it is correct.	
0199	196.a	<p>Response to Request for Comments on Docket ED-2023-SCC-0053</p> <p>Comments Due: Comments Submitted by: Title of the Collection:</p> <p>Federal Register Citation: ED Docket ID #: OMB Control Number: Federal Register Number:</p> <p>Student Section, page 6</p> <p>May 23, 2023 Illinois Student Assistance Commission (ISAC) Agency Information Collection Activities; Comment Request; 2024-2025 Free Application for Federal Student Aid (FAFSA®) 88 FR 17560 ED-2023-SCC-0053 1845-0001 2023-06169</p> <p>Q4 Student College or Career School Plans: When the student begins the 2024-25 school year, what will their college grade level be?</p> <p>Comment: Maintain the current format (i.e., the format in use on the 2023-24 FAFSA) of this question (current option choices of 0 – 7), or at a minimum, have a separate option choice for recent high school graduates.</p> <p>Rationale: The new format of this question limits the ability to separate students who will be first-time freshmen from returning students that are still in a freshman status. Beginning with the 2020-21 school year, Illinois implemented a FAFSA mandate requiring all high school seniors to complete a FASFA as a prerequisite to receiving a high school diploma. Having first-time freshmen separated from other students in a freshman status will enable the State to better track the impact of its FAFSA mandate. Also, maintaining the current format of this question will help with FASFA matching.</p>	196.a) Thank you for your comment. The grade level question is used to set federal direct loan limits.
	196.b	<p>Q5 Student Personal Circumstances</p> <p>Comment: Restructure the check box that currently reads, “The student has children or other people (excluding their spouse) who live with the student and receive more than half of their support from the student now and between July 1, 2024, and June 30, 2025.” Instead, structure it as two separate check boxes (the way it is on the current FASFA) that read as follows: “The student has or will have children who live with the student and receive more than half of their support from the student now and between July</p>	196.b) Refer to response for comment number <u>133.c</u>

	<p>1, 2024, and June 30, 2025.” and “The student has dependents (other than the student’s children or spouse) who live with and receive, and will continue to live with and receive, more than half of their support from the student now and between July 1, 2024, and June 30, 2025.”</p> <p>Rationale: For purposes of a TANF match in the State of Illinois, FASFA applicants with dependent children need to be separate from those applicants with other dependents, as the Illinois TANF program only provides assistance</p> <p>for pregnant women and families with one or more dependent children. Illinois is also</p> <p>taking steps to improve outcomes for students who are parents, e.g., by recently requiring that institutions provide students who are parents with information on the state’s childcare assistance program and the federal dependent care allowance. Being able to distinguish students who are parents from students with other dependents will help the state to better understand student-parents’ needs and outcomes and to design appropriate policies to help them succeed.</p>	
196.c	<p>Student Section, page 8 Q14 Student State of Legal Residence</p> <p>Comment: Reword this question to read, “Student State Where of Legal Residence the Student Resides:”</p> <p>Rationale: There is concern with the term “state of legal residence” as many families, especially those with a mixed immigration status, believe they are being asked about immigration status. The suggested rewording of this question will help to clarify that the FASFA is asking for the state in which the student resides, not whether they are a U.S. citizen.</p>	196.c) Thank you for your comment. The Department of Education considers this suggestion a stylistic preference.
196.d	<p>Parent Education Status Q15:</p> <p>Comment: Reword the question and answers to read, “Did either of student’s What experience do your parents attend college have with education beyond high school?”</p> <ul style="list-style-type: none"> o “YesNeither parent attempted education beyond high school” o No One or both parents attempted education beyond high school, but did not complete a Baccalaureate (4-year college) degree o One or both parents completed a Baccalaureate (4-year college) degree o Don’t know.” <p>Rationale: We recommend revising the word “college” to “education beyond high school” to include those parents who may have obtained a postsecondary credential. Also, the question and answers, as</p>	196.d) Thank you for your comment. The text for this question will be revised.

		<p>drafted, do not accurately reflect students that would be considered first-generation students. According to the federal definition, a student is considered to be a first-generation college student if their parent(s) did not complete a baccalaureate degree. Many states and institutions, as well as Federal programs such as TRIO, offer financial aid specifically to first-generation students. However, if a student answers yes to this question based on whether the parent(s) “attended” college (which could be anywhere from one semester on up) rather than completed, they could disqualify themselves from those types of financial aid.</p>	
0200	197	<p>The creation of a roles-based solution is detrimental for students who are low-income and first generation. As an academic advisor working in NYC schools, I have seen how difficult it is for students to obtain copies of their parents’ tax returns. Many parents of students who are first-generation lack the familiarity with technology and struggle to even make an account for FAFSA. With all of the proposed changes to the FAFSA application, low-income, first generation students will find it more difficult to apply for financial aid and ultimately, have them give up on their dreams to apply and attend college.</p>	197) Refer to response for comment number 2 .
0201	198.a	<p>I write on behalf of Common Cause Education Fund, a nonpartisan grassroots organization with state affiliate organizations dedicated to upholding the core values of American democracy. We work to create open, honest, and accountable government that serves the public interest; promote equal rights, opportunity, and representation for all; and empower all people to make their voices heard in the political process.</p> <p>The U.S. Department of Education (“ED”) recently released drafts of the updated Federal Student Aid Application material – these included the proposed 2024-2025 Free Application for Federal Student Aid (“FAFSA”) form and the FAFSA Submission Summary (formerly known as the Student Aid Report). We are writing to express our concern and disappointment that information about voter registration is not included in any portion of these materials. President Biden issued a groundbreaking Executive Order on March 7, 2021 Promoting Access to Voting (“Voting Access EO”). The FAFSA process is an ideal place to integrate voter registration and accomplish the goals of the Voting Access EO.</p> <p>Young people are much less likely to be registered to vote than older Americans, and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. We urge the Department to:</p> <ol style="list-style-type: none"> 1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, after students and families see the confirmation page. 	198.a) Refer to response for comment number 144.a .
	198.b	<ol style="list-style-type: none"> 2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov. 	198.b) Refer to response for comment number 144.a .
	198.c	<ol style="list-style-type: none"> 3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail. 	198.c) Refer to response for comment number 144.a .

		<p>In too many states, strict and arbitrary registration deadlines disenfranchise eligible voters. This means our elections are missing out on the vital voices of our country’s youngest voters. Registering eligible voters when they interact with the FAFSA is one of the best ways to streamline our voting systems, and it keeps voter rolls more accurate by removing the need to process updates or forms by hand.</p> <p>We appreciate the opportunity to provide these comments regarding the 2024-2025 FAFSA. We strongly urge the Department to make these recommended changes and make it easier for students to receive opportunities to register to vote and update their voter registration.</p> <p>Common Cause</p>	
0202	199.a	<p>The Honorable Miguel Cardona Secretary of Education U.S. Department of Education 400 Maryland Avenue S.W. Washington, D.C. 20202</p> <p>Re: Docket ID Number ED-2023-SCC-0053</p> <p>Rural Community College Alliance values this opportunity to present the concerns regarding the draft 2024-25 Free Application for Federal Student Aid (FAFSA).</p> <p>RCCA is a national alliance with over 270 members who share a specific focus on the importance of rural and rural-serving community colleges. One of the key tenets of our Strategic Plan is to “Advance the value proposition of rural community colleges among legislators, governmental agencies, stakeholders, and publics.” This incorporates identifying potentially detrimental outcomes to family farmers and their dependents seeking a college degree under current recommended changes to the FAFSA process.</p> <p>As many of our members serve in America’s Heartland and across the country, RCCA appreciates that family farms are valued as the foundation of many local rural communities, yet how their income is determined is unlike other families. The Small Businesses and Investment Farms section is of great concern to RCCA. For farms in particular, the financial structure that requires borrowing at the beginning of the year and paying back that loan over the course of the year means that the debts against the farm fluctuate. RCCA is supportive of colleges working with Congress to re-evaluate how small businesses and farms are included in the asset calculation. For the Fiscal Year 2024-2025, the Department of Education could:</p> <ol style="list-style-type: none"> 1. Remove or define “investment” as part of the farm. 	199.a) Refer to response for comment number 51.a .
	199.b	<ol style="list-style-type: none"> 2. Include in the instructions that the family home should not be included, even if it is physically located on the farm. 	199.b) Refer to response for comment number 140 .

	199.c	3. Provide further instruction on how to calculate assets.	199.c) Thank you for your comment. 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®) form.
	199.d	4. The calculation should not include non-liquid farm assets, such as farmland and equipment when determining a farm family's ability to pay for college.	199.d) Refer to response for comment number 51.a.
	199.e	Another section we recommend changes is State Deadlines: Deadlines need to be confirmed with each state due to changes many states have already made to adapt their processes to the pending FASFA changes and delay in the opening of the form.	199.e) Thank you for your comment. Please see response 25.b.
	199.f	The online form should include web links for each state's financial aid program so that students can confirm the deadlines themselves in case they change. 1. Monthly updates would benefit students, parents, and college staff accessing forms online. Thank you for your consideration of our concerns. If you have any questions or concerns, please contact Jill Loveless, president for Rural Community College Alliance, at president@ruralccalliance.org or by phone at 928-925-4081.	199.f) Thank you for your comment. 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®) form.
0203	200	May 23, 2023 The Honorable James Kvaal Under Secretary of Education U.S. Department of Education 400 Maryland Ave., SW Room 7E307 Washington, DC 20202 Mr. Richard Cordray Chief Operating Officer Federal Student Aid U.S. Department of Education 830 First St., NE Washington, DC 20002 RE: Free Application for Federal Student Aid (Docket ID number ED-2023-SCC-0053) Dear Under Secretary	200) Thank you for your comment. The Department of Education implemented this change in accordance with the statutory or regulatory requirements defined by the FAFSA Simplification Act and FUTURE Act.

Kvaal and Mr. Cordray,

I am writing on behalf of the Foundation for Tacoma Students in Tacoma, Washington with concerns about the removal of the “sibling discount” as part of the simplified Free Application for Federal Student Aid (FAFSA) that will be available to students in 2023.

While we are supportive of most of the provisions of the law, we are concerned that students with siblings in college will in many cases be eligible for considerably less financial aid after FAFSA simplification than under the current formula. We feel that abruptly removing the sibling discount will undermine ED’s goal of accurately calculating college financial burden.

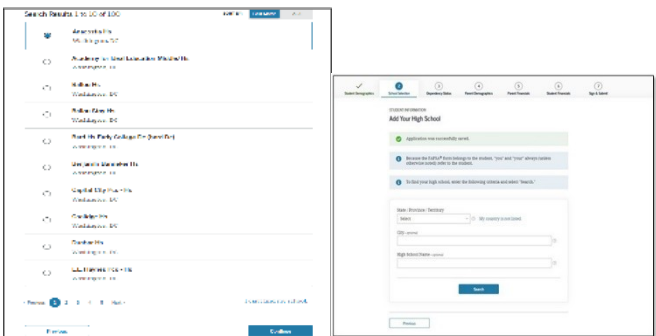
The simplified FAFSA will continue to ask about the number of siblings in college at the same time, but it will not use that information in the Student Aid Index (SAI) formula. That is, the effective “sibling discount” will be eliminated. This change will have a sizable impact on financial aid eligibility for students with siblings in college at the same time. Ignoring other changes in the formula, students with one sibling in college will have an expectation of family or personal financial contribution that is about twice as what their expected contribution is under the current system. The higher SAI translates to less eligibility for financial aid for these students.

We would like to ask ED to consider a transitional period of 3-4 years in which the revised SAI formula is phased in. ED could preserve the current expected family contribution formula that is reduced proportionally to the number of students in a family who are in college at the same time for one year. The revised formula could begin to take effect in year two with a smaller reduction in expected family or personal financial contribution; and then go fully into effect in year three or four.

In the long run, eliminating the sibling discount could bring greater equality to the financial aid system. Raising two children costs the same regardless of how close they are in age. From that perspective, providing discounts for siblings who happen to be in college at the same time is unfair and this policy change serves as a correction. However, we feel that doing so immediately will create significant problems for students who are currently of or near college age. For those already in college and likely for those approaching college age, the shock of facing higher prices is one they are not prepared for. A reasonable phase in period will give students and families time to prepare and provide policy makers with an opportunity to examine the impacts of this policy and make adjustments if necessary.

We support most of the aspects of the 2020 FAFSA Simplification Act, including:

		<ul style="list-style-type: none"> Increasing the income cutoff used to automatically award the maximum Pell Grant Increasing the amount of student and parent income that is exempted in determining financial need Reducing parents' expected payments for students with low incomes Significantly reducing the number of questions in the FAFSA form. <p>The changes entailed in this legislation will make it easier for students to apply for financial aid and will make college more affordable for lower income students. I applaud ED for balancing many complexities, and working to implement this policy in a way that provides the greatest benefit to lower income students. However, we feel that eliminating the discount students receive when they have siblings enrolled in college may carry unintended negative consequences for students currently enrolled in college or approaching college enrollment. For this reason, we request that ED consider a phased-in approach of this aspect of the law. Thank you for the opportunity to submit a public comment.</p> <p>Sincerely,</p> <p>Dr. Tafona Ervin Executive Director, Foundation for Tacoma Students</p>	
0204	201	The removal of the housing plan question will necessitate supplemental data collection. The consequent burden placed students is antithetical to the spirit of the FAFSA Simplification Act.	201) Refer to response for comment number <u>1</u> .
0205	202.a	<p>As an outreach professional working for state agency working with state grants and scholarships I believe it is essential that the online FOTW (FAFSA On the Web).</p> <ul style="list-style-type: none"> Getting the NCES code for the student's high school on 2024-25 ISIRs. 	202.a) Thank you for your comment. The NCES code will be included on the ISIR.
	202.b	To assist students in properly reporting their high school online, and by ensuring that the 2024- 25 FAFSA requires the "City" as a mandatory field to complete when students are searching for their high school; since there are numerous high schools with the same name or close to same name this is a very essential request to eliminate or reduce miss reporting or inaccurately reporting the high school name.	202.b) Thank you for your comment. The Department of Education is updating the online high school search feature to better assist customers and improve the accuracy of information collected and submitted on the Free Application for Federal Student Aid (FAFSA®) form.

	202.c	<ul style="list-style-type: none"> • Addition of a high school drop-down (straight down and not page by page) list of high school names based on the mandatory State & City in the online response to this high school search, and then in the back-end processing that generates the ISIR from the student's FAFSA submission, ED should assign a NCES code to the student's selected high school. <p>Currently, the 2023-24 FAFSA allows for students to identify the high school of attendance via a drop-down list and the list can be very long and have multiple pages. By requiring the City to be mandatory it will assist in the smaller lookup and improving the reporting results found for the correct selecting the correct answer.</p> 	202.c) Thank you for your comment. The Department of Education is updating the online high school search feature to better assist customers and improve the accuracy of information collected and submitted on the Free Application for Federal Student Aid (FAFSA®) form.
0206	203.a	<p>Via https://www.regulations.gov/ Re: Comment in Support of Including Voter Registration information as part of the Free Application for Federal Student Aid (“FAFSA”) materials.</p> <p>LatinoJustice PRLDEF (“LatinoJustice”) submits this public comment regarding the 2024-2025 FAFSA and the inclusion of voter registration materials as part of the application and FAFSA Submission Summary (formerly known as the Student Aid Report). For over five decades, LatinoJustice has litigated against practices that seek to dilute the voting power of Latinos and advocated for policies and practices that instead enhance that power. LatinoJustice writes today to call for the inclusion of voter registration information in FAFSA materials.</p> <p>Voting rights have faced increasingly partisan attacks aimed at suppressing access to the ballot. In 2021, President Biden issued an executive order, Promoting Access to Voting (“Voting Access EO”), calling for federal agencies to “consider ways to expand citizens’ opportunities to register to vote and to obtain information about, and participate in, the electoral process.”¹ Specifically, the Voting Access EO called for</p>	203.a) Refer to response for comment number <u>144.a</u> .

such considerations to include

ways to provide relevant information in the course of activities or services that directly engage with the public — including through agency materials, websites, online forms, social media platforms, and other points of public access — about how to register to vote, how to request a vote-by-mail ballot, and how to cast a ballot in upcoming elections.

Since the announcement of the executive order, only a few agencies have made noteworthy progress in expanding opportunities to register to vote.

The U.S. Department of Education, through its FAFSA application and subsequent Submission Summary, is best positioned to provide voter registration information not only to parents assisting with the application process, but also to students who are part of the new voter demographic. Unfortunately, recently released drafts of the updated FAFSA exclude any information about voter registration, in contravention of the strong exhortation in the Voting Access EO. Nearly 18 million students apply for school aid each year using the FAFSA

¹ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/03/07/executive-order-on-promoting-access-to-voting/>

application.² More than half of all applicants are within the key new voter 18-24 age range.³ As for historically disenfranchised groups, **74% of Latino students** and 84% of Black students complete the FAFSA.⁴ Accordingly, inclusion of voter registration information in the FAFSA application and subsequent Submission Summary would play an instrumental role in increasing voter registration and eventual turnout in ballot access for marginalized groups.

Young people are much less likely to be registered to vote than older Americans and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. Moreover, many states have failed to address limitations to current voter registration methods, including refusing to provide for same-day and online voter registration, or pre-registration for 16- and 17-year-olds. Federal agencies can play a key role in ensuring that young people and students have meaningful opportunities to participate in the electoral process.

		<p>For all these reasons, LatinoJustice urges the Department of Education to:</p> <p>Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, <i>after</i> students and families see the confirmation page.</p>	
	203.b	Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov .	203.b) Refer to response for comment number 144.a.
	203.c	<p>Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail.</p> <p>As we gear up for the 2024 election cycle, it is imperative that the Department of</p> <p>Education act now to ensure millions of students and their families, including those from historically marginalized groups, are provided vital voter registration information. We urge the Department to take immediate action to integrate voter registration into the FAFSA process to ensure all eligible college students and their families have access to the ballot box.</p> <p>Sincerely,</p> <p>Fulvia Vargas-De Leon Senior Counsel LatinoJustice.PRLDEF.fvargasdeleon@latinojustice.org</p> <p>² https://studentaid.gov/data-center/student/application-volume/fafsa-school-state ³ <i>Id.</i> ⁴ U.S. Department of Education, National Center for Education Statistics, The National Postsecondary Student Aid Study (NPSAS), 2016, https://nces.ed.gov/surveys/npsas/</p>	203.c) Refer to response for comment number 144.a.
0207	204	<p>As the statewide student association representing 100,000 Minnesota community and technical college students, LeadMN is acutely aware of the needs of students because we are students. We want to thank the Department of Education for intentionally elevating the voice of students as you work to improve the FAFSA process.</p> <p>We want to urge the Department of Education to integrate voter registration into the FAFSA process. The number one reason that young people do not register to vote is because no one asked them to register to</p>	204) Refer to response for comment number 144.a.

		<p>vote. By integrating voter registration into an existing activity, it will help more young people get registered to vote.</p> <p>President Biden recognized the importance of connecting higher education and democratic engagement in his groundbreaking March 7, 2021 Executive Order 14019 Promoting Access to Voting (“Voting Access EO”). Realizing the full potential of the Voting Access EO is one of the most important steps President Biden and the leaders of federal agencies can take to promote voting rights for all eligible Americans, including college students. This would leave a legacy on our democracy and ensure that every student’s voice is heard.</p> <p>Integrating voter registration into the FAFSA application process would help reduce barriers faced by historically disenfranchised communities. Approximately 84% of Black students, 74% of Hispanic students, 68% of Asian students, and 75% of Native American students complete the FAFSA. Integrating voter registration into the FAFSA process would help reach students who often have difficulties navigating the onerous voter registration process or keeping their registration up to date.</p> <p>This integration must go beyond just providing a link to the vote.gov page and should be a proactive prompt to register to vote. We know that students have the power to make a difference in our democracy. The Department of Education has the power to tear down an institutional barrier that too many young people face when they want to democratically engage.</p> <p>Sincerely,</p> <p>John Runningen President LeadMN - College Students Connecting for Change</p>	
0208	205.a	<p>Foundation for Civic Leadership (“FCL”) is providing this comment to ask that the Department of Education (“ED”) incorporate voter registration resources in The Free Application for Federal Student Aid (“FAFSA”) form. FCL is a nonpartisan nonprofit dedicated to engaging the next generation in democracy, and believes that ED has a unique opportunity to better serve students and the country by including these resources in this round of updates to the FAFSA form.</p> <p>Timely action by ED is essential for ED to enhance American education by properly informing students about voter registration resources. If the Department does not begin the process now, millions of college students and their families could miss out on learning how to register to vote, an essential part of learning democracy in America. If ED integrates a high-quality voter registration opportunity for college students into the FAFSA process, it would significantly increase both the learning among young people about how American democracy works, and increase engagement among young people in American democracy.</p>	205.a) Refer to response for comment number <u>144.a.</u>

	<p>The challenges young Americans face in participating in America include lack of information about registration for elections. Young Americans have less information about the voting process, and state requirements can confuse them even further, meaning they might be unsure on how to properly register to vote. First-time voters and those attending out-of-state colleges and universities are likely even less familiar with the process, making it particularly difficult for them to engage in our democracy. Young people also have a harder time with the parts of registering that cannot be done online, including aspects of the process that might require them to mail-in documentation.</p> <p>Therefore, we urge the Department to:</p> <p>1.Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, after students and families see the confirmation page.</p>	
205.b	<p>2.Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov.</p>	<p>205.b) Refer to response for comment number <u>144.a.</u></p>
205.c	<p>3.Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail.</p> <p>FCL appreciates the opportunity to provide these comments regarding the 2024-2025 FAFSA. FCL strongly urges the Department to make these recommended changes and make it easier for students to receive opportunities to register to vote and update their voter registration.</p> <p>DATE: May 23 2023 TO: Department of Education FROM: Foundation for Civic Leadership SUBJECT: FAFSA Form Updates</p> <p>Foundation for Civic Leadership (“FCL”) is providing this comment to ask that the Department of Education (“ED”) incorporate voter registration resources in The Free Application for Federal Student Aid (“FAFSA”) form. FCL is a nonpartisan nonprofit dedicated to engaging the next generation in democracy, and we believe that ED has a unique opportunity to better serve students and the country through this round of updates to the FAFSA form.</p> <p>Timely action by ED is essential for ED to enhance American education by properly informing students about voter registration resources. If the Department does not begin the process now, millions of college</p>	<p>205.c) Refer to response for comment number <u>144.a.</u></p>

students and their families could miss out on learning how to register to vote, an essential part of learning democracy in America. If ED integrates a high-quality voter registration opportunity for college students into the FAFSA process, it would significantly increase both the learning among young people about how American democracy works, and increase engagement among young people in American democracy.

Our democracy is built on the right to vote, but many Americans face barriers that make it difficult to register to vote and cast a ballot. Young people face significant hurdles when voting and consistently vote at lower rates than older Americans; according to the US Census Bureau, only 46% of eligible voters aged 18–29 voted in 2016, as opposed to around 71% for those aged 65 and older. And even though young people turned out in historic numbers during the 2018 election, their turnout only amounted to 35.6%, whereas 66% of seniors casted their ballots.

The challenges young Americans face in participating in America often begin with registration for elections. Young Americans have less information about the voting process, and state requirements can confuse them even further, meaning they might be unsure on how to properly register to vote. First-time voters and those attending out-of-state colleges and universities are likely even less familiar with the process, making it particularly difficult for them to engage in our democracy. Young people also have a harder time with the parts of registering that cannot be done online, including aspects of the process that might require them to mail-in documentation.

Recognizing the challenges Americans face when voting, President Biden took a step in the right direction on March 7, 2021 by issuing the groundbreaking Executive Order 14019 - Promoting Access to Voting (“Voting Access EO”). This order asserted that it is “the responsibility of the Federal Government to expand access to, and education about, voter registration and election information, and to combat misinformation, in order to enable all eligible Americans to participate in our democracy.” President

Biden tasked each agency of the Executive Branch to consider ways to expand opportunities for citizens to register to vote and obtain information about the process.

Information about voter registration should be included in the FAFSA materials. Recently released drafts of the updated FAFSA materials—these included the proposed 2024-2025 FAFSA form and the FAFSA Submission Summary (formerly known as the Student Aid Report)—did not include voter registration information, but ED still has time to take the steps to include these materials.

In March, FCL and 56 other organizations representing a diverse set of communities published a comprehensive report evaluating the progress of President Biden’s Voting Access EO. See [here](#) to access

the report, *Strengthening Democracy: A Progress Report on Federal Agency Action to Promote Access to Voting*. Several departments have made excellent progress; others, like ED, still have an opportunity to pursue action to implement Biden's EO. It would be wise of ED to follow other departments in taking advantage of essential opportunities.

Each year, millions of young people submit FAFSA applications. According to ED, from 2020-2021, almost 18 million people submitted a FAFSA application. The most recent National Postsecondary Student Aid Study found that 84% of Black students, 74% of Hispanic students, 68% of Asian students, and 75% of Native American students complete the FAFSA. Integrating voter registration resources into the FAFSA application would help ensure more young Americans have access to timely, accurate voting information.

President Biden noted in his EO that voters of color face obstacles that disproportionately affect their ability to vote, including a lack of proper election information. The National Study of Learning, Voting, and Engagement ("NSLVE")—a leading study of college student voting in the U.S.—found a racial gap in turnout during the 2016 election; Asian students were 2.5 times less likely to vote than White students, and Black and Hispanic students were each 1.3 times less likely to vote than their White counterparts. In 2020, NSLVE found that Asian American student participation rose but remained below all other demographic groups and that the voting rates of Black women dipped significantly lower than all other demographics.

As many of these young students apply for FAFSA, adding voter registration to the application would be a powerful step forward to ensuring students have easy access on how to become registered voters.

Therefore, we urge the Department to:

1. Add a proactive prompt that can redirect applicants to [vote.gov](https://www.vote.gov) at the conclusion of the FAFSA, after students and families see the confirmation page.
2. Add information about voter registration to the FAFSA Submission Summary, including information about [vote.gov](https://www.vote.gov).
3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form ("NMVRF") through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail.

		FCL appreciates the opportunity to provide these comments regarding the 2024-2025 FAFSA. FCL strongly urges the Department to make these recommended changes and make it easier for students to receive opportunities to register to vote and update their voter registration.	
0209	206.a	<p>Integrate Voter Registration into the Free Application for Federal Student Aid (FAFSA) Process</p> <p>The U.S. Department of Education (“ED”) recently released drafts of the updated Federal Student Aid Application material – these included the proposed 2024-2025 Free Application for Federal Student Aid (“FAFSA”) form and the FAFSA Submission Summary (formerly known as the Student Aid Report). ALIENTO is writing to express our concern and disappointment that information about voter registration is not included in any portion of these materials. President Biden issued a groundbreaking Executive Order on March 7, 2021 Promoting Access to Voting (“Voting Access EO”). The FAFSA process is an ideal place to integrate voter registration and accomplish the goals of the Voting Access EO.</p> <p>ALIENTO is a community organization based in Phoenix, Arizona that is DACA, undocumented, and youth-led. ALIENTO wants to ensure our community of young voters has a convenient voting access to exercise their civic duty. Young people are much less likely to be registered to vote than older Americans, and students in higher education face substantial barriers to registering to vote, keeping their voter registration information up to date, and exercising their right to vote. We urge the Department to:</p> <ol style="list-style-type: none"> 1. Add a proactive prompt that can redirect applicants to vote.gov at the conclusion of the FAFSA, <i>after</i> students and families see the confirmation page. 	206.a) Refer to response for comment number 144.a.
	206.b	<ol style="list-style-type: none"> 2. Add information about voter registration to the FAFSA Submission Summary, including information about vote.gov. 	206.b Refer to response for comment number 144.a.
	206.c	<ol style="list-style-type: none"> 3. Provide options for FAFSA applicants to indicate whether they want to receive a National Mail Voter Registration Form (“NMVRF”) through the mail. The NMVRF form can be used to register to vote in nearly all states, including states that do not have online voter registration. Additionally, a NMVRF form could be provided with all FAFSA Submissions Summaries sent through the mail. <p>Realizing the full potential of this vital EO is one of the most important things President Biden and the leaders of federal agencies can do to promote voting rights among college students and youth, and doing so would leave a lasting legacy on our democracy. We urge ED to take immediate action to integrate voter registration into the FAFSA process to ensure all eligible college students and their families have access to the ballot box.</p> <p>We appreciate the opportunity to provide these comments regarding the 2024-2025 FAFSA. We strongly urge the Department to make these recommended changes and make it easier for students to receive</p>	206.c) Refer to response for comment number 144.a.

		<p>opportunities to register to vote and update their voter registration.</p> <p>Sincerely, ALIENTO</p>	
0210	207.a	<p>I strongly urge the Dept to reconsider the removal of the Federal Work Study interest question and the housing plan question. Removing these questions will place an unnecessary burden on students as schools will be forced to ask students about their plans in some other way. Removal of these questions solves NOTHING and will lead to additional questions and forms being required by schools. Please keep it simple and leave these questions on the FAFSA.</p>	<p>207.a) Refer to response for comment number <u>1</u>.</p>
	207.b	<p>Additionally, please reconsider the inclusion of small business and family farm asset values on the FAFSA. The inclusion of these amounts will be very challenging for some small business and farmers to actually determine resulting in inaccurate information being provided and much frustration on the part of students in trying to actually determine the correct amounts to list. These figures used to be included back in the 1980s. It seems like they were removed for good reason. Please reconsider the inclusion of these asset values.</p>	<p>207.b) Refer to response for comment number <u>51.a</u>.</p>

