The Honorable Miguel Cardona  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue S.W.  
Washington, D.C. 20202

Re: Docket ID Number ED-2023-SCC-0053

April 25, 2023

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 National College Attainment Network (NCAN) represents more than 650 organizations that provide access and success services to students from low-income communities, first generation college-goers, and students of color. We have a strong interest in ensuring a smooth rollout of the Better FAFSA with a form and process that is error-free, clear, and straightforward and realizes the promise of the FAFSA Simplification and FUTURE Acts. We are pleased to partner with Federal Student Aid to help meet these goals. These comments reflect input from our national team, FAFSA Experts Group, and membership, and we appreciate your consideration of this feedback.

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.

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. We also recommend updating these deadlines at least monthly so that students accessing the form online will have the most up-to-date information. 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.

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.

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.

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.”

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.

7. **Student College or Career Plans** –
   - 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.
   - 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.
   - 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?

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.

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.
   - 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.
   - We also suggest placing all the race categories and subcategories in alphabetical order.
   - The help text would be clearer if it fully stated “financial aid eligibility” as opposed to just “aid eligibility.”

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.

11. **Parent Education Status** –
    - 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.

- 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.”

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.

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.

14. **Student and Parent Tax Filing Sections** –
   - “Income earned from work” refers to Form 1040 line 1, which has several sub-questions. We believe the FAFSA form should read “Line 1a.”
   - “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.
   - The Earned Income Tax Credit questions references “line 27a.” There is no line 27a on the 1040. The EITC is captured on “line 27.”

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.

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.

17. **Colleges** –
   - 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.
   - 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.

18. **Consent and Signature in Student & Parent Sections** –
   - 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.
   - 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.
There should be instructions for parents who do not have an SSN.

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.

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.

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.

**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. 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.

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. We also urge you to continue to offer alternative options for verifying the FSA ID: text, authentication app, and backup codes.

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 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.

**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. 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.

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.

**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. Guidance should be offered about what to do when they don’t match.

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.

**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.

Please reach out to Catherine Brown, brownc@ncan.org or MorraLee Keller, kellerm@ncan.org with any questions. Thank you again for the opportunity to provide input on this exciting and important initiative.