September 28, 2022

Dear Mr. Cordray,

On behalf of the National College Attainment Network, or NCAN, we write to express our support for FSA’s revised strategic plan. We believe it includes goals and objectives aimed at addressing most of the key strategic priorities needed to help underserved students to access federal student aid over the next five years. NCAN represents almost 600 members who work closely with students from low-income communities, first generation students, and students of color to help them complete the FAFSA and go to college. Our members work directly with two million students annually. As such, our focus is on making it easier to apply for federal financial aid so that more underserved students can realize their postsecondary education goals. To that end, we write to suggest a few modifications to Goals 1, 2, and 3 of the plan.

For Goal 1, Improve Customer Service and Outcomes for Students and Borrowers, we recommend adding the following:

- **Building a call center with the capacity to handle all the new actions that FSA will be delivering in the coming years.** FSA is responsible for implementing significantly expanded loan repayment and forgiveness options, a new FSA ID multi-factor authentication, Fresh Start, a new and simplified FAFSA process, and more. These are complex and varied processes, all of which will generate inquiries from applicants. It’s imperative the FSA focus on augmenting the call center’s capacity so that it can handle a much higher volume of requests in a timely manner. Objective 1.2 references the need for enhanced customer service. We recommend the plan be more explicit in setting a goal to build adequate capacity to respond to inquiries in real-time so that applicants do not have to wait to speak with an expert.

- **Engaging with college access organizations to improve the delivery of student aid.** While the Objective 1.3 mentions the need to engage with stakeholders, it’s focused almost exclusively on state regulators. NCAN college access advisors and other financial aid professionals need enhanced support, training, and resources to answer the questions that will come their way because of all of FSA’s new initiatives. Engaging with this community will
help ensure that more underserved students complete the FAFSA while reducing the volume of requests coming directly to FSA.

For Goal 2, Advance Equity and Access to Student Financial Assistance, we recommend adding:

- **Conducting early outreach about the Pell Grant.** Objective 2.1 references financial education and empowerment, and one of the best strategies to empower students is to reach them early in their educational journeys with information about the resources that will be available to them to help them finance college. The FAFSA Simplification Act requires ED to create consumer-tested methods of increasing early awareness of student financial aid eligibility. FSA should look for ways to inform students from low-income communities in middle school and early high school about the Pell Grant, including the difference between a grant and a loan, how much the Pell Grant provides, and how it can be used to expand students’ perception of their postsecondary options. Research shows that early outreach can change students’ perceptions about their postsecondary options and increase college-going rates among underserved student populations.

- **Simplify the FAFSA on time and in a way that streamlines and improves the applicant experience.** Designing a form with fewer questions is only half the battle. We recommend that FSA expand Objective 2.2, about simplifying the FAFSA, to establish a goal of working closely with the college access community to identify implementation issues and work to maximize the number of applicants completing the form. College advisors will need support above and beyond what they have gotten in prior years to understand the new form and formula for determining aid award calculations so that they can help explain the changes to students. Most importantly, and per our comments above about FSA’s capacity, we are concerned that FAFSA Simplification will not be implemented on time, as required by law, given the capacity constraints of FSA and hope that implementing FAFSA Simplification on time will be a top priority.

- **Minimizing verification burden.** Objective 2.2 mentions automating the verification process to optimize access for students and families. The verification process is onerous for applicants and generally does not, on average, reduce a student’s aid eligibility. We recommend that FSA continue to reduce the number of applicants subject to this process.

- **Improving the applicant experience.** Objective 2.3 aspires to provide seamless, easy, customized interactions with applicants. We recommend enhancing this recommendation by explicitly focusing on making it simpler for students with undocumented family members to complete the form, minimizing the challenges presented by the new multi-factor authentication system, and providing trainings and other resources to help applicants and their families understand what is required of them to complete the FAFSA.

For Goal 3, Strengthen Engagement and Accountability for Educational and Financial Institutions, we understand the need to implement secure measures to minimize waste, fraud, and abuse. However, we ask that any steps to increase security be balanced against FSA’s overarching goal of ensuring the
Americans have access to higher education regardless of socio-economic status. As one example, the new multi-factor authentication system is preventing students from logging in to FSA.gov to access the FAFSA form (even a blank one) if they are at a school or other location where they cannot log in to their email or use their phone. We recommend that FSA prioritize the customer experience when determining new security measures and seek to minimize the barriers such measures offer to students accessing aid.

Finally, for Goal 2, we recommend adding a performance indicator about how long it takes for applicants to complete the FAFSA. By monitoring this measure, FSA will be able to determine whether fewer questions on the FAFSA form is translating into a shorter application experience, which is ultimately the goal of a simplified FAFSA.

Thank you for the opportunity to comment on FSA’s strategic plan and for your hard work on behalf of students.

Sincerely,

Kim Cook
CEO, National College Attainment Network