



Federal Student Aid
U.S. Department of Education
400 Maryland Ave, SW, LBJ, Room 6W203
Washington, DC 20202–8240

RE: Docket ID number ED–2023–SCC–0216 Process for FSA ID Account Creation for Individuals Without a Social Security Number in Connection With Person Authentication Service (PAS)

May 31, 2024

Overview

The National College Attainment Network (NCAN) represents college access and success organizations from across the country that support hundreds of thousands of low-income, first-generation, and students of color each year as they apply for federal financial aid and consider their postsecondary pathways. As a result, NCAN members have witnessed firsthand the confusion and frustration the FSA ID process for individuals who do not have Social Security Numbers (SSNs) has caused. Students from mixed status families – who are U.S. citizens and entitled to receive Pell Grants and other federal financial aid if they qualify based on their family income – were largely unable to attain an FSA ID or to access the Free Application for Federal Student Aid (FAFSA) for the first four months of the calendar year. These students and families should have the same opportunity to efficiently complete a FAFSA as all other students who are eligible for federal financial aid. Unfortunately, this year’s dysfunctional system placed them at a steep disadvantage relative to their classmates. They were unable to complete an online FAFSA until April, which may jeopardize their ability to benefit from state and/or institutional aid programs with deadlines prior to mid-April or first come, first served approaches to allocating aid.

Indeed, throughout this FAFSA cycle, **the FSA ID process has been the biggest barrier to FAFSA completion. As a result, we urge Federal Student Aid to overhaul the identity verification process for people who do not have SSNs entirely and find a new method for verifying people’s identities that is fast and effective and does not require applicants to manually enter their income and asset information or transit proof of identify via email.**

We also implore Federal Student Aid to take the following steps to address major lingering issues with the FSA ID process:

1. **Create a Secure Portal for Identity Verification Forms.** Individuals who are not able to verify their identity through the TransUnion process must submit a copy of sensitive documents, such as passports, drivers’ licenses, or work authorization papers, by email. Individuals do not usually have high levels of security associated with their personal email accounts, and this process puts them at risk for identity theft. It also makes it harder to ensure that their files are associated with

the right case number, and many applicants have reported hearing from FSA that their documents have not been received, even though they were sent days, weeks, or even months before. We urge Federal Student Aid (FSA) to create a secure portal through which applicants and contributors can upload documents for review. This approach would be more secure, more efficient, and less vulnerable to human error.

2. **Provide Clear Messaging About the Process When TransUnion has No Information on File.** All contributors who do not have an SSN are currently being told they will be presented with questions from Transunion to verify their identity. Unfortunately, when TransUnion does not have enough information on file with which to generate identity verification questions, individuals are routed directly to instructions for completing the manual identity verification process without explanation. Because these individuals have been told they will receive questions from Transunion, the process is causing confusion, and they often believe the system to be broken. We recommend adding language clarifying that if TransUnion does not have information on file about them, they will immediately receive instructions on how to verify their identity manually.
3. **Add a Menu Option to the FSA Information Center (FSAIC) for FSA ID Issues.** The new FSA ID process – the first step towards completing a FAFSA – has generated many questions and the problems people are experiencing with it show no signs of abating. It's imperative that these individuals receive timely support so that they don't give up before they've even gotten into the form. To help resolve these problems faster, we recommend that FSA create a menu option on the FSAIC that allows callers experiencing FSA ID issues to be routed to operators with specific expertise and authorization to address these problems.
4. **Employ Bilingual Trained Staff.** Those answering the calls routed through the menu option described above should be bilingual or have immediate access to translators who can assist the person calling. If they do not, and the person calling has access to someone who can translate on their end, they should be permitted to move forward with the call. The staff should also be trained to review identity documents that have been submitted to enable a quick response once documents have been received. People who successfully answer the Transunion questions online are immediately verified and can move directly into the FAFSA. Those who are going through the manual process are owed the same quick processing once they have submitted their identity documents. Staff should not refer callers to the Social Security Administration (SSA) if they do not have an SSN, as the SSA will not be able to help them verify their identity.
5. **Assign Case Numbers to Everyone Who Needs One.** While FSA has sent case numbers to everyone who called FSAIC requesting one, many contributors got discouraged by long wait times on the phone and gave up before getting a number. We recommend that FSA go in and manually assign an identity case number to anyone who has attempted to set up an FSA ID and has not previously been assigned a case number manually or automatically by the system.
6. **Allow for Changes to the FSA ID Account Application.** Prior to the unveiling of the new process, many people attempted to set up an FSA ID process and entered their ITIN in place of an SSN.

They were informed that their identity was not verified, and that they did not have an FSA ID. Now those individuals are eligible to set up an FSA ID, but the system is telling them they already exist but are not verified. They were originally unable to delete the ITIN and go to the first screen on the current form, which has a box where they can indicate that they do not have an SSN. When these individuals call the FSAIC, they are told that they should create a new FSA ID, but they will need a different email address and phone number than the one associated with their previous attempt. We appreciate the recent detailed instructions about how to deactivate an FSA ID. However, it would be strongly preferred for FSAIC FSA ID Specialists to have the authority to delete incorrect information and allow the person to update incorrect fields or move forward in the process if they do not have a Social Security number.

I. Fix the Account Creation Process and Attestation Form

Individuals who cannot successfully answer the knowledge-based questions posed by Transunion are required to go through a manual identity verification process that requires completing an Attestation Form and submitting a form(s) of identity verification documentation. NCAN provides the following comments/suggestions to improve this process:

- **Add Extensive Help Text and Improve Messaging**
 - On the “Create Account” page, provide complete definitions of who should be setting up an FSA ID and what purposes it can be used for in the case of an eligible student, parent/spouse with an SSN, or a parent/spouse without an SSN.
 - Add help text explaining why they must set up an FSA ID and what it will be used for.
 - Add help text explaining that usernames must be unique so that applicants know to select one that is unusual and can avoid having to make many attempts at selecting a username.
- **Modify the Attestation Form and Process**
 - **Change the Form’s Expiration Date.** The Attestation form prints with an expiration date in the upper right-hand corner. If this is a federal requirement, we recommend moving the location of the expiration to the end of the form. The date currently printing on forms is June 30, 2024, and contributors think the form is expiring this June and that they will have to complete another one for the 2024-2025 academic year. We also recommend changing the expiration date to June 30, 2025, to correspond with when the 2024-2025 FAFSA closes.
 - **Expand the Types of Acceptable Identity Documentation.** The documentation forms currently permitted to allow people to verify their identity are too limited. Only 19 states issue state driver’s licenses or IDs to people without a legal immigration status and few parents or spouses who do not have an SSN possess an unexpired foreign passport. When a person does not have any of the options in Group A options, they are forced to

move to Group B, which requires a utility bill. It is standard practice for utility companies to list one name on the account, even if an unmarried or married couple are living together in the residence. This approach prohibits one of the parents or the spouse from taking advantage of Group B. If those individuals live in one of the 32 states with no option in Group A, they have been eliminated from having the necessary documents to verify their identity, and therefore the process is preventing an eligible student from submitting the FAFSA. We recommend expanding the definitions for municipal, community and consular identification and adding the option of identification cards issued by employers, universities and K-12 public school districts. Employer and school ID cards usually signify that a person has completed a human resources process that includes identity verification so that they can be added to the payroll.

- **Translate the Attestation Form.** We recommend making the Attestation Form available in the 13 most common languages identified in the Simplified FAFSA legislation. The FAFSA Simplification Act requires FSA to translate the FAFSA into the 13 most common languages and FSA has responded by providing translation support to anyone who needs help completing the FAFSA and speaks a language other than English or Spanish. There is no comparable translation service offered to people filling out the Attestation form. FSA should make this simple form available and accessible in more languages than English and Spanish.

In addition to improving the FSA ID process itself, we urge the Department to:

- **Ensure that all Changes to the FSA ID Process are in Place by September 1, 2024.** This timeline will allow all counselors, K-12 schools, colleges, state aid agencies to align their systems and materials to the new processes, and ensure that students and families receive accurate, helpful information about how to get an FSA ID.
- **Create a FAFSA Completion Checklist for Contributors without SSNs.** A checklist would help counselors, students, and families to understand what documents and information they need to have to complete a FAFSA, expediting the process and reducing confusion.
- **Use Name, Address, and ITIN to Match and Pull Tax Records.** If a person provides an ITIN, name and address, it should be possible able to find them in the IRS system, pull their tax returns and auto-populate the FAFSA, and eliminate the need for them to manually enter their information.
- **Halt the Manual Identity Verification Process if Contributors Must Manually Enter their Income Information.** As of today, people without SSNs are not having their tax returns pulled from the IRS; they are manually entering all their information. If that tedious and time-consuming process remains in place for the 2025-2026 award year, and there is no fix such as the one described in the bullet above, people without SSNs should not be required to manually verify their identities prior to contributing to a FAFSA.

- **Share Data on Success Rates.** We ask that you share data on how many people who have attempted to set up an FSA ID have gotten through only using the TransUnion questions, how many were sent to the manual verification process, and how many who submitted documentation through the manual process were approved.
- **Fix Language in FAFSA Upon Log-In.** Applicants receive an email every time they log-in to their FAFSA saying their information has been changed, even if they did not change anything. We recommend changing the language to say the information has been “verified,” and only using the word “changed,” if something has changed.
- **Address SSN Not Matching Error Message.** Some applicants are receiving an error message that says their SSN is not matching even though they have accurately entered their SSN. This message directs them to the Social Security Administration (SSA). Please figure out what is causing this issue and fix it. Directing people to the SSA is frustrating for them and unhelpful.

We are available to answer questions or provide clarification about any of the above recommendations and we appreciate your commitment to improving this process.

Sincerely,

Kim Cook

CEO, National College Attainment Network