



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)

February 26, 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 are eligible based on their family income – have been largely unable to attain an FSA ID or to access the Free Application for Federal Student Aid (FAFSA) since the form opened in January. We are concerned that these problems will lead many students from mixed status families to forgo college this year, a situation that will have long-term ramifications for state and local economies as well as the students’ long-term economic prospects. We write to urge immediate action to solve the problems associated with this process.

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 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.
 - Do not abbreviate “Social Security Number” next to the box associated with not having one.

- 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.
 - Provide clear messaging that the system is going to send individuals to the manual verification process when Transunion has no information on file for the individual. Contributors who were told they would be presented with questions from Transunion and are not, believe the system to be broken.
 - Have the system automatically generate and retain case numbers when the manual identity process is going to be required instead of requiring people to call the FSA Information Center (FSAIC) to receive a case number. FSAIC is overwhelmed, with reported wait times of multiple hours. Everyone in this situation needs a case number and the onus should not fall to them to take additional action to take steps that FSA has required of them. Case numbers need to be retained in the contributor's FSA ID account so they can reference it at any time.
- **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.
 - **Create a Secure Portal for Identity Verification Forms.** The form requests a copy of sensitive identity documents be submitted by email. Individuals do not usually have high levels of security associated with their personal email accounts. Federal Student Aid (FSA) needs to create a secure portal that documents could be uploaded for review.
 - **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.

II. Create a Unique, Well-Staffed Information Call Center for FSA ID Issues

- **Add a Dedicated Phone Line for FSA ID Issues.** This new FSA ID process has generated a tremendous number of questions and shows no sign of abating. We recommend that FSA create a dedicated phone line to help those with FSA ID issues. This number should be appropriately staffed given demand at peak times in the FAFSA process, such as the first 6 months after the form opens, to minimize wait times for callers to less than ten minutes.
- **Employ Bilingual, Trained Staff.** Those answering the calls on this dedicated line 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.

III. Allow for Full Account Resets

- 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 are 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. There needs to be a process whereby an FSA ID Specialist can either:
 - delete certain fields, such as a phone number, in an established FSA that can then be updated or
 - delete the entire account so that the person can start again.

IV. Provide Clearer Communication and Resources for Counseling Support

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

- **Dedicated additional resources for personalized financial aid counseling** for mixed status families that extends through the summer. College and success programs will need more time to help students get through the process even once the process is up and running because the timeline for completing the FAFSA has been so compressed and because the work-around recommended by FSA requires this population to make corrections.
- **Stronger and clearer communication** for mixed status families, including how long it will take to process paper FAFSAs and when schools and states will start receiving ISIRs, the privacy protections that are in place for people going through the manual identification verification process, when the system will start generating automated case numbers for people going through the manual process for getting an FSA ID, and how long it will take for applicants and contributors to correct their FAFSAs once the system has become fully functional.
- **Guidance to states, colleges and universities, and scholarship providers** urging them to extend their financial aid deadline and hold back a portion of their financial aid budgets for students from mixed status families who, through no fault of their own, have been unable to submit the FAFSA online until this point. These students are at risk of losing out entirely on financial aid that is distributed on a first-come, first-served basis. While FSA has now offered a complicated and time-consuming work-around, it also said that only students facing imminent financial aid deadlines should use it. Unfortunately, even students who are not facing immediate deadlines may also miss out on receiving financial aid because of the delay if schools and states do not hold back some funding for this population or otherwise allocate it in a way that is not strictly first-come, first-served like extend their deadlines and then allocate their aid based on need.

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