Better FAFSA for Mixed-Status Families:
Top 10 Things to Know So You Can Prepare

The Free Application for Federal Student Aid (FAFSA) which unlocks the Pell Grant, work study, federal student loans and other forms of federal financial aid, is getting an overhaul this year as the US Department of Education (ED) implements the FAFSA Simplification and FUTURE Acts.

The FAFSA opened on December 31, 2023, three months later than the traditional launch date of October 1, which leaves students and families with a compressed window in which to fill it out.

Completing the FAFSA is important because it can put college within reach financially. As a result of the recent legislative changes, Pell Grant eligibility is expanding and the formula for determining eligibility is becoming more transparent. This means thousands of additional students will be eligible to receive up to $7,395 in federal grant money – money that does not have to be repaid – for college.

Most residents, including citizens, legal permanent residents, T visa holders, and other specified non-citizens, are eligible for federal financial aid, even if their parents are undocumented. Changes to the FAFSA may however pose some challenges for mixed status families. People without Social Security Numbers (SSNs) will need to go through a separate process to obtain an FSA ID prior to starting to form.

This document provides an updated overview of key changes and things students and families need to know to apply for federal financial aid.

Additional FSA ID requirements.
Under the new process, **everyone** who wants to enter information into an online FAFSA will need an FSA ID in order to access the form. This means students and parents who are required to provide financial information (see number two below) will need an FSA ID to fill out the form.

Parents who contribute the most financially are required to provide financial information.
The parent who contributed the most financially to the student in the prior tax year (the FAFSA for the 2024-25 academic year will use 2022 federal tax information) is required to provide their financial information on the FAFSA. If parents are married and filing jointly, only one parent will have to complete the form. If they are divorced, only the parent (and their spouse if they remarried) who contributes the most financially will be required to submit their financial information to the form. Early in the process, students will be asked to identify the parent(s) or spouse who will be contributing financial

information on the form. It will be critical that they enter that person(s) information exactly as it appears in their FSA ID. Any mismatch could lead to delays in processing the student's FAFSA.

The form is role-based.
Each person will only be able to see questions related to their role. When a student logs in, they will only be able to see questions that should be answered by the student. The parent or spouse will need to log in to see the questions related to their role. Each person must complete the questions associated with their role for the student to be able to submit the FAFSA.

New FSA ID process for people who don't have SSNs.
In the past, people who did not have an SSN submitted information by mail and did not set up an FSA ID. This year, FSA will use information from TransUnion® to verify applicants' identities by asking a series of questions that only that individual would know the answer to. This process will take place entirely online through the FSA portal. Here are the steps required, as described in the Federal Register:

- **Step 1**: An individual should visit StudentAid.gov, select "Create Account," and complete all steps, including answering one-to-four knowledge-based verification questions via TransUnion®.

- **Step 2**: Upon completing the Create Account process, the individual will see a confirmation page with the results of their identity verification. If any of the information the individual provides does not match with the information that TransUnion has, the individual will be notified that FSA was unable to verify their information. Then, they must contact the Federal Student Aid Information Center (FSAIC) at 1-800-433-3243. The individual will also receive an email from FSA informing them to call FSAIC for next steps and to verify their identity.

- **Step 3**: Once the individual contacts FSAIC, FSA will create a case number and send them a verification email, which will include guidance on how to submit copies of unexpired acceptable documentation to verify their identity. Individuals will also be required to submit an attestation and validation of identity form along with their approved identity documentation. This form will be available on here under the tab "StudentAid.gov account."

- **Step 4**: Upon receipt of the email that FSA was unable to verify their identity, an individual is then required to submit one or a combination of their acceptable documentation from the list below (see step five) and the signed attestation form to: IDVerification@ed.gov.

- **Step 5**: FSA will review an individual's submitted documentation and signed attestation form to ensure it is acceptable and matches the account information provided during the Create Account process. If there is a successful match, the Department will finalize the account creation. The individual will receive an email indicating their identity has been verified and that they may now use their

account username and password (FSA ID) to log in at StudentAid.gov and complete applications for student financial assistance programs.

Once an individual has received an FSA ID, they will be able to proceed with their component of the FAFSA.

FSA has released a list of acceptable documents to establish identity.
In order to establish identity, individuals can submit either (1) a US driver's license; (2) a U.S. state/city identification; or (3) a foreign passport OR (1) municipal identification cards AND utility bill; (2) community ID AND utility bill; or (3) consular identification cards/matricula consular AND utility bill. Alongside their document, individuals must submit a signed attestation form to IDVerification@ed.gov.

An ITIN is not needed to obtain an FSA ID.
While the paper FAFSA form does provide a place for applicants and parents to enter an ITIN if they have one, an ITIN is not required for completing the form.

The privacy of data collected through the FAFSA is protected by federal law.
Federal law prohibits the use of data collected through the FAFSA for anything other than calculating federal and state financial aid. Entities with access to this data are also required to protect the data against security threats or unauthorized uses. FSA will not share FAFSA information with anyone except the schools the student indicates they want to attend (so they can use the information to offer financial aid) and a few federal and state government agencies (so they can check to be sure the information is accurate or determine financial aid eligibility). Counselors should assure families of these protections and respond to any concerns they may have about sharing identifying information.

There is a manual process for those who cannot verify their identities online.
Students and parents who are not able to verify their identities through the TransUnion process will still be able to provide identity verification documents directly to FSA. See the step-by-step instructions above.

The paper FAFSA form is still an option.
Families who would prefer to submit a paper FAFSA will not be required to obtain an FSA ID. However, the paper form will still require that all applicants provide consent for FSA to access their federal tax information from the Internal Revenue Service (IRS) and to verify their identity. Individuals who do not file taxes will have this fact verified by the IRS.

Income verification may be required.
In some cases, such as when ED is not able to pull federal tax information directly from the IRS, students and parents may need to provide additional documentation to verify their income. Students and families should seek support if they are flagged for verification to help them get through the process as quickly as possible.

We recommend counselors take the following steps to support students applying for FAFSA this cycle:

1. Encourage eligible students to set up their FSA ID and complete the FAFSA as soon as possible and to reach out to a trusted counselor or advisor if they have questions.

2. Brief school communities, including parents, on changes to this year's process.

3. Connect with undocumented and mixed status families to address any concerns they may have about the financial aid process.

4. Check back frequently for updates from FSA regarding the process for undocumented parents and guardians.

5. Be patient as the new process is rolled out but stay vigilant in submitting any questions you may have to ensure that your application is submitted by the priority deadline in your state.

We will continue to report critical information to our members as we learn more. To stay up to date, you can also bookmark NCAN's Better FAFSA page and FSA's Better FAFSA page and sign up for FSA's partner emails, which provide critical information to school counselors, college access organization staff, and other student mentors. You can also find state-by-state information regarding financial aid for immigrant students and families on the Higher Ed Immigration Portal.