



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

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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 appreciate the opportunity to provide feedback on the final draft of the 2024-2025 FAFSA, as we have on previous drafts, and we are grateful to you for incorporating many of our comments into this version. In particular, we applaud Federal Student Aid (FSA) for removing the question asking applicants if they are transgender. This question would have created a lot of anxiety about who would be able to view applicants' answers to the question and what would be done with this information.

Here are our final comments on the form:

1. **FAFSA State Financial Aid Deadlines** – We strongly encourage FSA to reach out to state agencies one last time to update state filing deadlines before the form is finalized. The current form has the wrong dates for California and Texas, two large states with thousands of FAFSA filers. The California deadline has been moved to April 2, 2024 and Texas's has been moved to March 15, 2024. It's critical that students have the best information available.
2. **ITIN Field** – The final question of section 1 currently reads "Enter the student's ITIN if they don't have an SSN." This phrasing assumes that every student who does not have an SSN has an ITIN. We recommend changing it to "Enter the student's ITIN if they have one and do not have an SSN."
3. **Assets** – In sections 22 and 40 about student and parent assets, the question about businesses and farms uses two different terms to describe a farm. "Investment farms" is in the title of the item and "for-profit agricultural operations" is in the description. We recommend selecting a consistent term and adding a note that applicants should not include the family home value when determining the net value of the farm.
4. **Asset Instructions** – In the instructions for the asset section, there are several pieces of conflicting information about how to report 529 plans. It is our understanding that, starting with the 2024-2025 FAFSA, for dependent students, the value of the 529 plan for the student whose FAFSA is being filed should be reported in the parent section (if they are required to report assets). It is our further understanding that the value of a 529 plan for any other siblings in the household should not be reported. If our assumptions are correct, there needs to be a major revision to the instructions to clarify who reports that asset and that the student's plan is the

only amount reported. If the student is independent, it needs to be made clear that the 529 plan is reported for the student only in the student section if they are required to report assets.

5. **Release of Paper FAFSA** – We encourage FSA to make sure that the paper FAFSA pdf is posted online on the same day that the online interactive version becomes available.

We thank you for your time and attention to these changes and look forward to seeing the final version of the form soon.