

**2016-2017 Federal Student Aid Application Comments Tracking Summary
(60 Day draft)**

Package/Docket ID number ED-2015-ICCD-0101

#	Comment(s)	Commenter	Resolution
1.	The FAFSA question relating to scholarship or grants received in the prior tax year is very often misreported. Families misunderstand the question and report ALL scholarships and grants received in the prior year, whether they were reported as taxable income or not. This yields an artificially low initial EFC and corresponding artificially high expectation of eligibility for Pell and other need-based aid programs. Once this is corrected later in the financial aid cycle, the increase in EFC and loss of financial assistance can be dramatic. Most students do not receive or report taxable scholarships or grants and ED including this question contributes to erroneous results. The question should be removed from all forms of the FAFSA. Thank you for your consideration.	Jonathan Green, FAA	No Change. Questions 44d and 93d are statutorily required because the Higher Education Act excludes taxable amounts of scholarships and grants from total income. Removing these questions would penalize the student.
2.	Under questions 24 & 25-- It would be helpful if the level of schooling offered a baccalaureate option. This would help in determining if the student is first generation, which is an important piece of criteria to the TRiO programs.	Kristina Castine, paulsmiths.edu	No Change. The responses to these questions have been carefully selected in consultation with the states since use of the responses varies by state.
3.	1. The U.S. Department of Education solicits recommendations from the public for changes in the paper/PDF versions of the FAFSA and SAR in the early fall. It does not, however, release the demo version of the online FAFSA (FAFSA on the Web) until December 29, 2-3 days prior to the onset of online applications. This provides insufficient time for public comment and testing of the online form. The online form differs from the paper/PDF form in important ways. For example, an error in the processing of decimal points forced the U.S. Department of Education to reprocess hundreds of thousands of applications, and even then may not have corrected all of the applications containing inaccurate financial information. This error could have been caught sooner, had the demo version been available earlier for testing by financial aid professionals. Although the U.S. Department of Education provides a full copy of the PDF version of the FAFSA and SAR as part of this docket soliciting comment on information collection activities, they provide a screen snapshot of only the front door of the www.fafsa.ed.gov web site, not the full online application. Approximately 99% of FAFSAs are submitted using the online FAFSA, with only 1% submitting a PDF or paper FAFSA. How can the public evaluate this information collection activity, when the details of the online information collection activity are omitted? At the very least, the U.S. Department of Education needs to submit screen snapshots of every page of	Mark Kantrowitz	1. No Change. The updates that are included in each year's application release take a considerable amount of input and effort by a large number of parties to define the requirements, ensure the accuracy of the functionality, develop the system, test the system and resolve any issues, apply security protocols, and obtain clearance from the Office of Management and Budget. Because of the extensive amount of time needed to complete all of these activities, the date on which the application is currently provided via the FAFSA on the Web Demo site is the earliest that it is possible.

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	<p>the online form, in all variations, if not a fully working demo version of the application, as part of this information request. In addition, the U.S. Department of Education should provide both screen snapshots and a working demo version of the online form for public comment on improvements in the form at least 90 days prior to the January 1 start of the FAFSA application season.</p> <p>2. Incidentally, the Children's Online Privacy Protection Act (COPPA) necessitates a different version of the PDF FAFSA. The U.S. Department of Education did not submit the COPPA version of the FAFSA PDF as part of this information collection request.</p>		<p>2. No Change. The Children's Online Privacy Protection Act (COPPA) does not require a different version of the Paper/PDF <i>Free Application for Federal Student Aid</i> (FAFSA®). Under COPPA, applicants may not use <i>FAFSA on the Web</i> (FOTW); they must print, complete and mail in the paper/PDF FAFSA.</p>
4.	<p>1. Is it possible to have a pop up box if they mark filing as Head of Household? You indicated you will file as Household on your 2015 Federal Tax Return please read the IRS regulations regarding filing status to ensure you qualify to file this way.</p> <p>2. Determining if they can use the DRT reword the "Did you file an Amended Return" to something more like this, "Since you filed your original Federal Tax Return were you required to file an Amended Return" and not put this as the last question. We had a lot of students and parents mark this when they were going in to update and use the DRT.</p> <p>3. Clarification in the instructions of Legal Guardianship to add "if custody was awarded by the courts and the court papers say custody (not guardianship) do not mark this box, contact your school about a dependency override."</p> <p>4. Student's Status: Change Graduate or Professional to Masters or Professional</p>	Barbara Boots, EWU.edu	<p>1. No Change. <i>FAFSA on the Web</i> (FOTW®) currently displays an alert when there is a conflict between the student marital status and the student (and spouse) tax return filing status. This message states: "You said that the student is <marital status> but you also said that the student's tax return filing status is <tax return filing status>."</p> <p>The message then advises the applicant to change one of their responses, if one is incorrect, before proceeding. If the information is correct, the applicant is advised to make sure that the income information that will be provided on the upcoming pages reflects the applicant's and spouse's 2015 income.</p> <p>Additionally, logic in FOTW prevents married students and parents who report a tax filing status of Head of Household from using the IRS Data Retrieval Tool (IRS DRT).</p> <p>2. No Change. The Department of Education believes the instructions provide adequate guidance. This question and associated help text were modified on the 2015-2016 FAFSA® to better define the term "amended tax return" and specifically reference the Form 1040X.</p> <p>3. The third paragraph in the Notes for questions 54 and 55 (page 5) section has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p> <p>4. No Change. The responses to Question 30 have been carefully selected in consultation with the states since use of the responses varies by state.</p>
5.	Consider changing the wording of the legal guardianship question to: "Does someone	Anonymous	The Department of Education has made the requested change to the <i>Free</i>

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	other than your parent or stepparent have legal guardianship of you, as determined by a court in your state of legal residence?" or something of the sort that includes "other than your parent or stepparent" in the wording.		<i>Application for Federal Student Aid (FAFSA®)</i> .
6.	I would like to see a pop up question added at the end of the FAFSA application that would ask if there are any schools you would like to add or delete. Students leave schools on the FAFSA that they don't plan on attending, causing the school to continually get updated ISIRs.	Susan Anonymous	No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i> .
7.	We sometimes refer to the schools list as a helpful tool for diagnosing issues of overlapping payment, aid from another school, etc. Not having the list would make such research/investigation lengthier.	Brett Hawkins, dbu.edu	No Change. The purpose of the <i>Free Application for Federal Student Aid (FAFSA®)</i> is to gather data for consideration of the students' eligibility for student aid. The data the institution receives should only relate to that eligibility decision. The full list of schools has no bearing on student aid eligibility.
8.	<p>1. For FAFSA Question 48, is there some way to make that question more clear for students? We have so many students that answer that question incorrectly because their end goal is to pursue a masters or PhD, but they are enrolled in undergraduate studies. Making the question clearer could avoid such confusion and incorrect responses.</p> <p>2. For FAFSA Question 59, can the choice of "Divorced or Separated" and "Widowed" be rearranged to reflect the student's marital status question 16? The choice would then reflect "Separated" as it's own choice and "Divorced or Widowed" as the next choice. The problem arises when trying to resolve conflicting information with parents' marital status and tax filing status, among other general conflicting information issues.</p> <p>3. This comment is now in regards to the removal of the school codes selected by the student: Will you also change the ISIR information in the "Office Information" section, when "Source of Correction" = School and "Federal School Code Indicator" = Federal School Code #1? We will not have a reference as to which school made the corrections to the student's data.</p>	Teresa Eiler, Galen College	<p>1. No Change. The Department of Education believes the current instructions for Question 48 provide adequate guidance.</p> <p>2. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>3. No Change. Technical Information regarding ISIR changes that will impact schools can be found on the <i>Information for Financial Aid Professionals</i> website.</p>
9.	As a school with limited resources, removing the list of schools from the ISIR would negatively impact the students who apply to our school. Though it is not a perfect system, we do use the order in which school are listed when determining our order of contacting students for follow up and aid explanations. We have three aid counselors attempting to contact over 1700 FAFSA filers, in addition to returning students, to explain the elements of their financial aid. We have to prioritize somehow, and we do so by FAFSA positioning. It may not be perfect, but by assuming others arrange their	Nick Jenkins, lr.edu	Refer to comment #7 for resolution.

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	<p>contact the same way, we can better assume that if we first contact students who list us in the top four positions on the FAFSA, that those who listed us lower will have been contacted by at least one of the schools listed in their top four. While I understand that there is concern that schools may be awarding based on relative positioning, a move to impact those few schools will be to the detriment of the Students, who may end up receiving less personalized service and less detailed one-on-one communication. I am not referring just to our institution specific aid, but also (and more importantly) how their federal aid works, why their EFC is what it is, whether they qualify for state aid and if that is available at other institutions. The students we are able to contact are given a clearer understanding of the aid process, and without direction to focus our efforts, which is currently provided by the school list, I feel like the students will be hurt, adding to an already difficult to navigate process.</p>		
10	<p>I am in favor of the change to stop sharing with schools the list of schools listed by students on their FAFSA form. There is evidence that schools are using this against student interests to offer less aid. Schools are in the business of making money so it is a conflict of interest for them to have access to information about student preferences. Schools should put their best offer out there so that they are in transparent competition with each other and the student can choose based on the best offer that meets their needs.</p>	John Buell	Thank you for your comment.
11	<p>Removing the list of schools, that schools receive on the FAFSA is a really bad idea. We are a small Christian college and we do not use this information to discriminate at all, but the list is helpful to us in awarding State aid and our Admissions Counselors make good / fair use of this data. Please leave the list of schools on the FAFSA for us!!</p>	Julie Dunning	Refer to comment #7 for resolution.
12	<p>I had assumed that the Need-Based Educational Aid Antitrust Protection Act of 1997 (limits exchange of financial information between colleges) had been extended to the present so I was very surprised when I read that FAFSA allows admissions officers to access the list of schools to which an applicant applies. When I looked up the Act, I realized that it expired in 2001. Please make this change to the FAFSA to allow for students to be considered on the merits of their application packages solely.</p>	Annemarie Bean, Student (at the time)	Thank you for your comment.
13	<p>There is still a great deal of confusion for students when entering parental information. The way the FAFSA is currently worded "What was your legal parents' (biological and/or adoptive) marital status on the day you submitted your FAFSA?" makes it sound like they are only asking about biological or adoptive parents, not step-parents. Most students do not read the notes on the side margin. Even if you read the blurb in the side margin "A legal parent includes a biological or adoptive parent, or a person that the state has determined to be your parent (for example, when a state allows another person's name to be listed as a parent on a birth certificate). Grandparents, foster</p>	Anonymous	<p>The URL for the Reporting Parental Information page on StudentAid.gov has been added as a resource to the Step Four text that precedes Questions 59 and 60. In addition, the last sentence of the fourth bullet in the Notes for Step four, questions 59-94 (pages 6 and 7) section has been bolded. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p>

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	<p>parents, legal guardians, older brothers or sisters, widowed stepparents, and aunts and uncles are not considered parents unless they have legally adopted you." it still isn't clear. We have countless students who put that their parents are divorced or never married because they are thinking of their biological parents and then indicate their parent filed taxes as "married". This results in conflicting information that has to be resolved, extra work for the student, and extra work for the school, not to mention confusion and frustration. It also raises the question of how many parents are actually remarried but the information is never captured because they enter a filing status that doesn't raise a red flag. Please consider re-wording this portion of the FAFSA to make it directly clear that biological or adoptive parents who have married someone other than the student's other biological parent need to report that.</p>		
14	<p>Some schools use the order of the schools listed on the FAFSA to determine if awarding the state grants/scholarships should be done. If the student lists another school first, the state is likely to send the award to that school with a delay in changing to the school the student is actually attending. By removing the other schools and the order, we may award the state scholarship which may never come, or come very late. Also, we would not know we were not the first school listed to inform the student to contact the state and let them know where to send the award.</p>	Anonymous	<p>Refer to comment #7 for resolution.</p>
15	<p>I am very disappointed that other school codes are being removed from the ISIR. Our institution has used that information many times in the case of fraud. We notify other schools listed of issues we discover. Without the schools on there, we'd be forced to report issues to the OIG's office, which doesn't handle individual cases of fraud.</p>	Nick Prewett, Missouri.edu	<p>Refer to comment #7 for resolution.</p>
16	<p>Not releasing the names of all schools to which a student has applied to each school listed on the student's FAFSA will be a welcome change. There is no discernible reason why that information should be shared with all schools unless it is to help the school make admissions or recruiting decisions which is best left up to means other than using data from the FAFSA.</p>	Anonymous, Anonymous	<p>Thank you for your comment.</p>
17	<p>Online FAFSA (Q 26 on paper FAFSA): Create a pop-up edit when this question is left 'blank.' Leaving this blank delays the processing of federal loans and/or grants. This is tied to ATB regs, so if it is 'blank' when loans are 'originated' with COD the loans will be 'rejected' and then the financial aid staff have to manually review and then override or correct the FAFSA. I believe the same 'reject' would happen when trying to process a Pell Grant. It would be great if you a pop-up edit is put in place to alert the FAFSA filer that they have left this question blank and they should answer the question.</p>	Steve Winey	<p>No Change. Question 26 on the <i>Free Application for Federal Student Aid</i> (FAFSA®) is, in fact, required to be answered online. <i>FAFSA on the Web</i> has an edit that prompts students to answer this question if they skip it and try to proceed to the next page.</p>
18	<p>We are a multiple institution state system where each of the 11 institutions has its own school code, but all share one TG number. Currently, CPS sends to our TG number one ISIR per student, and we load it at each of our institutions listed in the school</p>	Dennis Junk, ndus.edu	<p>Refer to comment #8.3 for resolution.</p>

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	choice section of the ISIR. If you remove the school list, CPS processing must change. We will need an individual ISIR for each school in our systemr that the student selects.		
19.	While ED has apparently heard and understood community comments regarding the "false amendment" indicators we are getting (thank you), I believe this issue has less to do with the wording and more to do with the placement of the question(s) on the page of FOTW. From helping students and parents file the FAFSA this year, it is clear to me that the fact that the filer is told in bold "You may be able to use the IRS Data Retrieval Tool to view and transfer your tax information from the IRS." - and then immediately asked a Yes/No question about amendments is causing the filer to not completely read the statement about amendments and to think they are answering a question related to the bold statement (like "Would you like to try to use the DRT to transfer your tax info?). If the eligibility for DRT questions were simply separated from the bold statement about using DRT, I believe it would help tremendously. See attached file for more detail. Thank you.	Melet Leafgreen	FAFSA on the Web text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i> .
20.	In the Student Financial Information and Parent Financial Information sections of FOTW, under Additional Financial Information - the purpose of the question regarding grant & scholarship aid reported to the IRS is not effectively communicated. At my institution, 100% of the students and parents who filled in this field did so incorrectly. (We know this field causes problems so we follow up with each one). We did not find a single case in which this box was checked and an amount entered which was not an error. Perhaps if you added a tax form line # as a reference it would help. Add a statement such as "Situations in which a student or parent must report scholarship and grant amounts as income on the tax return are extremely rare. If you did report some, it will likely be found on line 7 of your tax return, and will be indicated with the abbreviation SCH. If you did not include scholarship & grant aid for yourself or your child in your tax return, please uncheck the box." Even a bolding of the words REPORTED TO THE IRS at the end of the phrase next to the check box might do some good. Thank you,	Melet Leafgreen	No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).
21.	Thank you for this change. As a guidance counselor who works with needy students, I am thrilled to know that there will be one less obstacle in their path to affordable higher education.	Moira Mckinnon	Thank you for your comment.
22.	To Whom It May Concern: These comments involve the draft version of the 2016-2017 FAFSA. In reviewing that document, I noticed a likely error involving the IRS line references for two questions on the draft. Specifically, the likely issue involves the description for how one should determine the dollar amount to report for U.S. Income Taxes Paid (FAFSA items # 37 and 86) if one files the IRS Form 1040A. While the two IRS line references may be the appropriate ones to use for purposes of those two	Kalman Chany	No Change. The Department of Education has established the exclusion of the Excess Advance Premium Tax Credit Repayment to calculate income tax for FAFSA purposes. Therefore, the current directive of Form 1040A (line 28 minus line 36) is correct.

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	<p>FAFSA questions, it appears likely that the order of those two IRS Form 1040A line references should be reversed. The line references for the 2015 IRS 1040 on the draft version of the FAFSA are in the correct order- whereby the amount of any excess advance premium tax credit repayment is deducted from the US tax liability amount traditionally reported on prior versions of the FAFSA i.e. the amount of U.S. income taxes paid net of certain non-refundable tax credits to arrive at the proper answer. However for the 2015 IRS 1040A tax return line references: the subtraction function as currently stated on the draft of the 2016-2017 FAFSA appears to require one to subtract the U.S. Tax liability amount from the amount of any excess advance premium tax credit repayment. (Line 28 minus Line 36) This would likely result in a negative number for that question on the FAFSA for most tax filers with sufficient taxable income (net of the standard or itemized deductions as well as the personal exemption amounts) that results in any federal income tax liability net of any nonrefundable tax credits. Unfortunately, the draft of the 2015 version of the IRS1040A is not yet available on the irs.gov website. (I am basing my statements of the order of the line items on the final version of 2014 1040A - assuming the repayment amount will again precede the U.S. tax liability amount traditionally requested on prior versions of the FAFSA - as well as on the order of those two IRS line items on the draft of the 2015 IRS 1040 currently available.) Assuming those line references are correct for the 2015 version of the IRS Form 1040A, then the wording for the applicable part of those questions should be revised to read: "...Form 1040A - line 36 minus line 28...". Thank you for considering this comment.</p>		
23.	<p>Since schools are being required to document low income, I would like to suggest that the FAFSA require ALL sources of INCOME to be listed on the FAFSA and then use LOGIC to exclude any sources that should NOT be counted against the student's EFC. If all sources of income were listed on the FAFSA, then many could be excluded from the Low Income Verification process. We require the students/parents to submit a low income form that requests them to list their Expenses and their Income and this is causing a delay in processing their aid in a timely manner. Thank you in advance for considering the above request.</p>	Louise Driver	<p>No Change. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process. The verification selection process is separate from the application process and takes place after the <i>Free Application for Federal Student Aid</i> (FAFSA®) has been submitted.</p>
24.	<p>Working in outreach with ISAC, I've noticed that the FSA ID takes students and parents too long to develop. There are too many security questions and too many screens to open to finish the process (FAFSA's page, FSA page, and then email). This way of signing the FAFSA discourages many from finishing. I thought the PIN was more efficient, though people regularly forgot their pin. They also forget their FSA credentials, which takes a while to recover and once recovered they must wait 30 min before they can use it. It is not a very fast or efficient system.</p>	Rey Irizarry	<p>The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p>

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25.	The state of Ohio FAFSA deadline is October 1 for the initial FAFSA to be completed. No further application is required. Thanks!	Tamika Braswell, tbraswell@regents.state.oh.us	The Deadlines section has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i> .
26.	I agree with Melet Leafgreen's comment (Aug 18, 2015) and would add the following. In addition to consideration for how the question about "scholarship and grant aid reported to the IRS" is worded; some other options which could help remedy this high error field are: a) add and require that they complete a pop-up worksheet (similar to Number in Household); and/or b) Have a follow-up 'pop up edit' which is triggered if they report a number other than 'blank' or '0.' The 'pop up edit' would again remind them that they can only include a number that was actually reported as 'Scholarship and Grant Aid as part of their AGI' and would prompt them to either 'correct this data' or 'continue.'	Steve Winey	Refer to comment #20 for resolution.
27.	For question 55, legal guardianship, I suggest adding "Answer "NO" if one of your parents was awarded CUSTODY of you due to divorce".	Anonymous	Refer to comment #4.3 for resolution.
28.	My students often list the colleges on the FAFSA in alphabetical order, thinking that it will be obvious that their list is alphabetized and not prioritized. Watching the many comments exchanged on various social media since this announcement was made, it's clear that many (most?) colleges do use the list to varying degrees. I try to encourage my students not to strategize or use gamesmanship. I'm hopeful this change is approved.	Anonymous	Thank you for your comment.
29.	I am writing to ask that you continue to provide the FAFSA position data to universities. This is very helpful data in predicting enrollment for fall terms. The vast majority of schools are not using this against students but using to help in enrollment projections.	Cecilia Castellano	Refer to comment #7 for resolution.
30.	1. In the section labeled "Applying by the Deadlines," we recommend adding a sentence such as, "Students who file the FAFSA early may qualify for more grants." As discussed in the student aid policy analysis paper, https://www.edvisors.com/ask/student-aid-policy/leaving-money-on-the-table/ , students who file the FAFSA in January, February and March tend to receive more than twice as much grant money as students who file the FAFSA later. This is not only due to institutional and state grant programs that have early deadlines, but also due to the exhaustion of limited FSEOG allocations. Note also that the paper shows that lower-income students are more likely to procrastinate when filing the FAFSA. So, rather than just encouraging students to file the FAFSA as early as possible, it is best to use these insights to motivate them to file the FAFSA earlier.	Mark Kantrowitz	1. No change. This recommendation is based on an assumption of school and state awarding philosophies. Because the timing of an applicant's <i>Free Application for Federal Student Aid</i> (FAFSA®) submission has no impact on his or her eligibility for federal student aid, we do not believe it is appropriate to include such text on the FAFSA. 2. No change. The tax return transcript is only required for those students

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	<p>2. In the section labeled “Using Your Tax Return,” the form encourages the use of the IRS Data Retrieval Tool. Perhaps, there needs to be a warning for applicants who don’t use this tool that their aid may be delayed. Applicants who don’t use the IRS Data Retrieval Tool must have the IRS send a tax transcript to the college financial aid office. But, the IRS took their Get-a-Transcript tool offline after it was hacked. This forces applicants to send a paper form by postal mail. This can cause delays, especially for students who are living outside the U.S.</p> <p>3. In the section labeled “Filling Out the FAFSA,” the first paragraph briefly discusses professional judgment. But, it only mentions changes in the family’s financial circumstances, not other unusual circumstances. Not every unusual circumstance involves a <i>change</i>. There is enough room to add a brief mention of unusual circumstances. We recommend inserting “or other unusual circumstances (such as high unreimbursed medical or dental expenses)” after “(such as loss of employment)” in the first sentence.</p> <p>4. In the section labeled “Let’s Get Started!”, we recommend inserting “on pages 9 and 10” after “Refer to the notes.” The change in the order of pages in the PDF version of the FAFSA may cause some confusion, so specifically identifying the page numbers may help.</p> <p>5. The 2015-2016 FAFSA included bold text “STATE AID DEADLINES” vertically in the right margin. This appears to have been removed in the 2016-2017 draft FAFSA. We recommend restoring it, if possible.</p> <p>6. We compliment the U.S. Department of Education on the introduction of alternate shaded lines in the state deadlines list, as it makes the list more readable.</p> <p>7. We recommend removing the footnote “+ Applicants encouraged to obtain proof of mailing.” from the bottom of the state deadlines list, and instead add a similar directive in the “Mailing Your FAFSA” section on the left-hand column of the page.</p> <p>8. We recommend replacing “aid” with “financial aid” or “student aid” in the headings for the sections labeled, “How much aid will I receive?” and “When will I receive the aid?”, as there is sufficient space for this addition.</p>		<p>selected for verification, when they cannot or do not use the IRS Data Retrieval Tool.</p> <p>3. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>4. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>5. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>6. Thank you for your comment.</p> <p>7. No Change. Removing this footnote from the deadlines table would lessen the purpose of the text. The text referenced defines the “+” symbol that is used only in the deadlines table.</p> <p>8. Section headings on page 1 have been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p> <p>9. The text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal</i></p>

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	<p>9. In the section labeled, “How much aid will I receive?”, please correct the sentence that defines financial need. The sentence currently reads: “Financial need is the difference between your EFC and your college’s cost of attendance (which can include living expenses), as determined by the college.” A sentence along the lines of “A is the difference between B and C” is the equivalent of $A = B - C$. Thus, this sentence incorrectly defines financial need as $EFC - COA$ instead of $COA - EFC$. Please change the sentence to read: “Financial need is the difference between your college’s cost of attendance (which can include living expenses), as determined by the college, and your EFC.”</p> <p>10. In the section labeled “How can I have more colleges receive my FAFSA information?” the numbered list should be replaced with a bulleted list. A numbered list suggests that the items are to be taken as a sequence of steps. But, this list of three items presents three options for adding more colleges, not an ordered list of steps.</p> <p>11. In the last paragraph in this section, the phrasing “any new school codes that you add will replace one or more of the school codes listed” suggests that the addition of new codes pushes old codes off the list, when, in fact, the applicant will need to delete an old code when adding a new code. We recommend inserting “need to” between “will” and “replace.” Alternately, we suggest rewriting the sentence to be clearer: “If there are ten school codes on your record, each new code will need to replace one of the school codes listed.”</p> <p>12. In the section labeled, “Where can I receive more information on student aid?”, in the last paragraph, the U.S. Department of Education may wish to replace “religious organizations” with “faith-based organizations”, consistent with its practice on other forms and public communications.</p> <p>13. We have heard reports from U.S. citizens living outside the U.S. that various U.S. Department of Education web sites, such as fafsa.ed.gov and studentloans.gov, require a U.S. address. We have not been able to confirm this. However, it suggests that FAFSA on the Web may be confusing for applicants who do not have a U.S. address. Applicants may not be reading the context-sensitive help text. It may be advisable to move “Foreign Country” to the top or bottom of the state list. We recommend running an A/B test to test various methods of organizing the state list on the online FAFSA.</p> <p>14. #13. There is no mention on the FAFSA or accompanying instructions about the</p>		<p><i>Student Aid.</i></p> <p>10. The numbered list has been replaced with a bulleted list as suggested.</p> <p>11. The text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p> <p>12. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>13. No Change. The list of states online is in alphabetical order and includes locations outside of the United States such as the Canadian Provinces, Foreign Country, and U.S. territories.</p> <p>14. No Change. There is no special COPPA version of the <i>Free Application for Federal Student Aid (FAFSA®)</i> for applicants under the age of 13, just special</p>

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	<p>issues associated with the Children’s Online Privacy Protection Act (COPPA). We recommend adding instructions to this question along the lines of “If you are under age 13, please call 1-800-433-3243 to get a version of this form that does not collect your email address.” to comply with the COPPA.</p> <p>15. #23. We recommend replacing the text “(such as grants, loans or work-study)” with “(such as grants, work-study or loans)” so that the options are listed in preference order (e.g., loans need to be repaid, while grants and work-study do not). This will match the order in which they are listed in the answer to “Why fill out a FAFSA?” on page 2 and in the Page 1 introduction to the FAFSA, “Use this form to apply for free federal and state grants, work-study, and loans.”</p> <p>16. #24 and #25. The questions before and after these questions all relate to the student. This is the only set of questions that concern the student’s parents in Step One. We recommend moving them to the end of Step One, after question #31. This will allow questions #28 and #29 to move up to page 3, where the juxtaposition with question #26 will be more effective.</p> <p>17. In the footer of the page, the page number is written in title case, “Page 3”, in the center of the page, while it is in lower case on the right “Step One CONTINUED on page 4”. We recommend capitalizing the letter “p” in “page” in both locations, for consistency, and to make similar changes throughout the form.</p> <p>18. We recommend switching to the present tense, CONTINUES, instead of the past tense, CONTINUED. In addition, the CONTINUED text appears only when a step is split across two pages. On the page before the start of a new step, we recommend including similar text, such as “Form CONTINUES on page 6” on the bottom of page 5 and “Form CONTINUES on page 8” on the bottom of page 7.</p> <p>19. #30. Applicants often get confused by this question and respond with their <i>ultimate</i> academic degree objective, instead of their <i>initial or current</i> degree objective. We recommend experimenting with alternate phrasings for this question, such as, “What degree or certificate will you be working on when you begin the 2016-2017 school year?” Perhaps, also insert the word “currently” after “will you”. The current phrasing involves rightward extraposition, which is a grammatical structure that is more difficult to comprehend.</p>		<p>processing. If an email address is provided by someone under the age of 13, it is not captured by the system.</p> <p>15. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>16. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>17. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>18. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p> <p>19. Question 30 has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p>

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	<p>20. #31. Once again, we recommend dropping the question concerning the applicant's interest in work-study. Some students incorrectly believe that if they say they are not interested in work-study, they will get more grant aid.</p> <p>21. We recommend replacing question #31 with a question about unusual circumstances, so that the college financial aid office can proactively contact applicants who are affected by unusual circumstances for a possible professional judgment review.</p> <p>22. #32-#34. The references to tax returns are ambiguous, causing some applicants to confuse them with state income tax returns. We recommend experimenting with alternate phrasings to reduce the likelihood of confusion. For example, perhaps use the word "federal" or "IRS" before "tax return" and "other" instead of "another."</p> <p>23. #33. Applicants who file both U.S. and foreign income tax returns are confused by this question.</p> <p>24. #39, #40 and #88, #89. Although the wording of this question has improved over the last several years, it is still problematic. It excludes partnership income (line 17 of IRS Form 1040), excludes retirement plan contributions (line 7 of IRS Form 1040 is based on Box 1 of the W-2 instead of Box 5), includes taxable scholarships and fellowships (which are not subject to FICA) and includes the employer FICA contribution. Even though the instructions use the word "may," some financial aid administrators incorrectly insist that applicants and parents who have correctly reported income earned from work must instead report figures that exactly match the instructions. This leads to too high an EFC because the calculated FICA and state income tax allowances are too low. We recommend changing the text to read as follows to correct this error: "This information may be on the W-2 forms (Box 1 or Box 5, whichever is greater), or on IRS Form 1040 - lines 7 + 12 + 17 + 18 + Box 14 (Code A) of IRS Schedule K-1 (Form 1065); on 1040A - line 7; or on 1040EZ - line 1. Exclude taxable scholarships or fellowships. If any individual earning item is negative, do not include that item in your calculation."</p> <p>25. #39, #40 and #88, #89. These questions should perhaps refer to the "tax return</p>		<p>20. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p> <p>21. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p> <p>22. No Change. The Department of Education believes the current instructions provide adequate guidance.</p> <p>23. No Change.</p> <p>24. No Change. Because of the complexity of the Internal Revenue Code in this area and the limited number of applicants who may be impacted, the Department of Education is not making any changes in order to avoid unnecessarily complicating the process for most applicants.</p> <p>25. Text associated with Questions 39, 40, 88 and 89 has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p>

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	<p>listed in question 33” or “tax return listed in question 81,” respectively, to improve the clarity.</p> <p>26. #42, #91. The definition of net worth is not entirely accurate. We recommend correcting the definition to read as follows: “Net worth means current market value minus debt secured by the asset.”</p> <p>27. #44d, #93d. Some applicants may confuse grants and scholarships for K-12 as opposed to college. We recommend inserting the word “college” before “student grant and scholarship aid”.</p> <p>28. #45j. For clarity, we recommend inserting “or other person” after “parent”. Applicants often get confused about money received from grandparents, aunts, uncles and other individuals.</p> <p>29. At the top of the page, replace “Health professions students” with “Health professions and law school students,” as the use of FAFSA data is also now common in many law schools.</p> <p>30. In the introductory text for Step Four, we recommend replacing “aunts and uncles” with “aunts, uncles and siblings” as sometimes students will live with an older sibling.</p> <p>31. #73, third bullet. To clarify, we recommend inserting “even if they do not live with your parents” after “other children”. This is a common source of confusion for applicants and parents.</p> <p>32. #74, #96. The instructions need to specify “at a college or university that is eligible for U.S. federal student aid”, as the college or university must be a Title IV institution per the Higher Education Act of 1965 [20 USC 1087nn(b)(3), 20 USC 1087oo(b)(3), 20 USC 1087pp(a)(2) and 20 USC 1087qq(a)(3).</p> <p>33. #75-#79 and #97-#101. Applicants and parents sometimes assume that they must receive one of these means-tested federal benefits in order to qualify for student financial aid. We recommend changing the order of the five means-tested federal benefit programs</p>		<p>26. Text on pages 4 and 7 has been deleted and the Notes for questions 42 and 43 (page 4), 45j (page 5), and 91 and 92 (page 7) text on page 9 has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p> <p>27. Text associated with Questions 44d and 93d has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2016-2017 Free Application for Federal Student Aid</i>.</p> <p>28. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>29. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>30. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>31. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>32. No Change. The Department of Education believes the addition of this text would create confusion since it is unlikely that applicants know if a school is a Title IV institution.</p> <p>33. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>34. The Department of Education has made the requested change to the <i>Free</i></p>

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	<p>to match the likelihood of receipt, so that the most common program appears first.</p> <p>34. #88, #89. It is not uncommon for a student whose parents are divorced/separated and not living together to report the income earned from work for the non-custodial parent in addition to the income earned from work for the custodial parent. We recommend adding an instruction "Report the information for the parent listed in questions #61-#64 in question #88 and the information for the parent listed in questions #65-#68 in question #89."</p> <p>35. #90. Insert "Don't include student financial aid." at the end of the question, similar to the instructions for question #41.</p> <p>36. #95, second bullet. Insert "even if they do not live with you" before "and".</p> <p>37. #96. Insert "Do not include family members who are in U.S. military service academies." similar to the restriction in question #74. The prohibition on counting enrollment in U.S. military service academies applies to spouses and children of the applicant, not just siblings.</p> <p>38. In Step Seven, the signing statement does not mention the FSA ID, although it does mention a username and password. Some applicants may get confused, so it is best to mention "FSA ID" in addition to the other types of credentials.</p> <p>39. In the section labeled "Notes for questions 56-58 (page 5)", second to last paragraph, we recommend inserting "college" before "financial aid office" to distinguish it from a (private or non-public) secondary school financial aid office.</p>		<p><i>Application for Federal Student Aid (FAFSA®).</i></p> <p>35. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®).</i></p> <p>36. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®).</i></p> <p>37. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®).</i></p> <p>38. No Change. The Department of Education believes the current text is adequate.</p> <p>39. The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®).</i></p>
31.	<p>We are a public two year college district that processes the ISIR at our District Office for four colleges. Eliminating the names of all colleges from the ISIR will impact the process in which we load the ISIR into our system. Although I agree with the desire to limit colleges from viewing where the student may want to attend, I request that the colleges be provided more time for implementation of the new process. If this is approved, we will need to revamp our system to accommodate the change. Based on the size of our organization, these new requirement cannot be meant through a manually process without a major impact on the service to students. Revamping our system will require more than 2 months.</p>	Roy Beckhorn	<p>Refer to comment #8.3 for resolution.</p>
32.	<p>Remove the question - Do you want to skip the remaining questions about you and</p>	Lisa Martens	<p>No Change. The Department of Education has stated that, in cases where the</p>

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	<p>your parents assets? (OR something close to this).</p> <p>This is a separate question from the other asset question. Students may not have put income on their original FAFSA and when trying to correct due to verification or what not this question pops up on the parents Financial Information page and is buried in the other questions. If they had previously answered yes to this, it skips over the students financial information completely. Therefore, this skip logic is very confusing to families and become frustrated when trying to correct their FAFSA but can't get to the students financial questions.</p>		<p>dependent student has qualified for an Automatic Zero Expected Family Contribution (EFC) and has been allowed to skip certain financial questions due to the <i>FAFSA on the Web</i> skip logic, most financial items do not need to be verified. Please see the Program Integrity Questions and Answers Verification – Archived Guidance, VI-Q5/VI-A5, located here: http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification-archive.html</p>
33.	<p>I am a single mother of two kids in college--freshman and junior. Both my children plan on going to graduate/professional school. I am an accountant and would greatly appreciate if there was guidance on the requirements for auto zero and simplified EFC not just for the current school year, but for several years (3-4). This would greatly help in financial planning and savings needed. It is imperative to plan for much needed auto, IT needs, housing, etc. Knowing the available resources would aid in constructing a viable, responsible financial plan. For instance, will the AGI remain at \$24,000 for the next 4 years for auto zero EFC or will it be adjusted to inflation? I definitely believe this is an incredibly low threshold and should be increased at least to a minimum livable dollar amount (\$30,000). I appreciate your time and consideration of my comments. Thank you very much.</p>	Ruby Jain	<p>No Change. The income threshold for the automatic zero and simplified Expected Family Contribution (EFC) formulas is set by law on an annual basis and is published in the Federal Register each year when it becomes available. The income threshold for the simplified EFC formulas is not directly tied to inflation. The threshold has increased to \$25,000 for the 2016-17 award year, but the Department cannot speculate on when or whether it will increase in the future.</p>
34.	<p>The purpose of the FAFSA is to gather data for consideration of the students' eligibility for federal student aid (and to a greater extent institutional and state aid). The data the institution should receive must only relate to that eligibility decision. Providing the listing of schools the data was submitted to in addition to your institution has no bearing on federal aid eligibility. In particular the listing in order of the schools only opens the question of inappropriate actions taken by institutions.</p>	David Krause, St. Mary's University, TX	Thank you for your comment.
35.	<p>As a former foster youth, I would like to see Question 52 worded in a way that is clearer about who qualifies as an independent student. Not everyone considers themselves "wards of the state," especially if they are living in kinship care. They may not even know they are wards of the court.</p>	Heather Swenson Brilla	<p>No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>
36.	<p>Nevada has a new state-funded need-based financial aid program. It was approved after the deadline to submit state deadline information for the 2016-17 FAFSA, but we respectfully request you add the following information to the deadline section for Nevada: Silver State Opportunity Grant: as soon after January 1, 2016 as possible. Awards made until funds depleted. All other aid: check with your financial aid administrator. Additional forms may be required.</p>	Renee Davis	<p>The Department of Education has made the requested change to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

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37.	<p>1. MY SUGGESTED VERSION OF THE 16-17 FAFSA--a lot of questions eliminated!</p> <p>Full legal name Full Mailing Address SSN Date of Birth Phone Email Citizenship Alien Registration Number Current Marital Status Date of Marital Status Gender Register for Selective Service? Drug felony? High School Completion Status Highest level of education completed and when (new question to clarify student's academic status) Current Grade Level Degree/Certificate Pursued</p> <p>Taxes filed? Filing Status--Please note that if you are married and did not file a joint tax return, the IRS link will not work and you need to provide additional information to your Financial Aid Office for you (and spouse) AGI Tax Exemptions Student Income Spouse's Income</p> <p>Active duty? Veteran? Have children? Have other dependents? Orphaned, in foster care or ward of the court?</p>	Loretta Fairley William Carey University, Hattiesburg, MS	1. No Change. The Department of Education limits the collection of information on the <i>Free Application for Federal Student Aid (FAFSA®)</i> to data necessary to determine eligibility for aid. An explanation for inclusion of each FAFSA question can be found in the Justification of Data Elements document here .

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	<p>Emancipated minor? In legal guardianship? Homeless or at risk of homelessness?</p> <p>Parents' marital status Date Status Took Effect Father/Stepfather/Other SSN Full Legal Name Date of Birth Mother/Stepmother/Other SSN Full Legal Name Date of Birth Email</p> <p>Total Household Members--provide list with name, relationship to student, age, and college enrollment Parent Taxes Filed?</p> <p>Filing Status--If your parents are married/living together and did not file taxes jointly, you will need to provide tax documents for both to your Financial Aid Office. AGI Tax Exemptions Father/Stepfather/Other Income Mother/Stepmother/Other Income</p> <p>Colleges to Receive FAFSA</p> <p>Student Signature Parent Signature Date Completed</p> <p>SPECIFIC NOTES:</p> <p>2. Student's Marital Status--Don't repeat this question in step 3. Also, if the marital status entered on this question does not match the student's tax filing status, refer the</p>		<p>2. No Change. The question in Step 3 of the Paper FAFSA® is used to determine the applicant's dependency status. This question does not appear on the web if the student has indicated he/she is married.</p>

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	<p>student back to this question in case the discrepancy was a typo.</p> <p>3. Student's Gender--Do NOT let the student skip this question. It often prompts females to register for Selective Service.</p> <p>4. High School Completion--Do NOT let the student skip this question. It leaves the Student Eligibility Code blank, creating unnecessary delays in originating awards.</p> <p>5. Student's Tax Completion--Don't skip this question then comment on SAR "We assume you did not or will not file a tax return." Have the student answer this question regardless. In one instance, a student whose mother did not work and didn't file didn't have to answer this question and the student made \$39K, which drastically affected his Pell.</p> <p>6. Student's Income Tax--If the student enters a number that is glaringly wrong compared to the AGI, don't let the student proceed without correcting it. This is the most common tax correction FAPs have to make.</p>		<p>If the Student's Marital Status and Student's Tax Filing Status questions are inconsistent, messaging is provided in <i>FAFSA on the Web</i>(FOTW) and on the <i>Student Aid Report</i> (SAR) informing the applicant of the potential discrepancy. However, a marital status and tax filing status that appear to conflict may not require a correction. The department published guidance last year to address how to resolve marital status and tax filing status inconsistencies. See: http://ifap.ed.gov/eannouncements/051514ResolvingMaritalStatusandTaxFilingStatusInconsistencies.html for additional information.</p> <p>3. No Change. The purpose of the gender question is to identify those applicants who may be required to register with the Selective Service System. The Selective Service question only displays in <i>FAFSA on the Web</i> to those applicants who identify themselves as male and are under the age of 26 .The question does not display when the gender question is left blank.</p> <p>4. Refer to comment #17 for resolution.</p> <p>5. No Change. The Department of Education uses skip logic in combination with other functionality in <i>FAFSA on the Web</i> (FOTW) to present applicants with the appropriate questions needed to complete the form. Many students who qualify for an Automatic Zero Expected Family Contribution (EFC) are not required to respond to a large percentage of the <i>Free Application for Federal Student Aid</i> (FAFSA®) questions. A dependent student's eligibility for an Automatic Zero EFC is based on the financial information of the parent(s). If the parent(s) meet the criteria for an Automatic Zero EFC, the student's income information is not considered in the EFC formula.</p> <p>6. No Change. <i>FAFSA on the Web</i> (FOTW®) has edits and messaging for both the student and parent that display when the taxes paid is equal to or greater than the AGI, and the data has not been transferred from the IRS. When data has been transferred from the IRS and the IRS Request Flags for the parent and/or the student are set to "02", no edits are triggered since data transferred from the IRS, and not changed, is considered to be verified.</p>

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	<p>7. Parent Marital Status--If this does not match the parents' tax filing status, direct them back to this question to correct possibly typos.</p> <p>8. Parent(s)' Names--Due to DOMA and the fact that some students put mom first and dad second on the FAFSA, require their full names so that if we have to request a Social Security card to correct a typo, we'll know which info to ask for. It's easier to tell who's who when you have more than an initial for the first name.</p> <p>9. List of Household Members--Rather than ask for number in household, have the student enter the list as if he were completing a verification worksheet. This would provide more clarification and possibly reduce or eliminate the verification sheet.</p> <p>10. Parents' Tax Filing Status--If this does not match the marital status reported, direct them to correct any typos. If the discrepancy is not a typo, direct them to www.irs.gov to request transcripts.</p> <p>11. Parents' Tax--If this number is too large in proportion to the AGI, don't let them proceed without correcting it.</p> <p>12. If the taxes have been linked, do NOT let student or parent go back and change any tax information past that point. Too many times, we will have completed the file, then they'll change it and we have to go back and get tax transcripts or have them link the</p>		<p>7. No Change. If the Parent's Marital Status and Parent's Tax Filing Status questions are inconsistent, messaging is provided in <i>FAFSA on the Web</i> (FOTW[®]) and on the Student Aid Report (SAR) informing the applicant of the potential discrepancy. However, a marital status and tax filing status that appear to conflict may not require a correction. The department published guidance last year to address how to resolve marital status and tax filing status inconsistencies. See: http://ifap.ed.gov/eannouncements/051514ResolvingMaritalStatusandTaxFilingStatusInconsistencies.html for additional information.</p> <p>8. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the Free Application for Federal Student Aid (FAFSA[®]).</p> <p>9. No Change. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process. The verification selection process is separate from the application process and takes place after the <i>Free Application for Federal Student Aid</i> (FAFSA[®]) has been submitted..</p> <p>10. Refer to comment 37.7 for resolution.</p> <p>11. Refer to comment 37.6 for resolution.</p> <p>12. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p>

#	Comment(s)	Commenter	Resolution
	<p>information again.</p> <p>It would be best if the only changes allowed involved email addresses, mailing addresses, phone numbers, school codes, etc. Only let them change the taxes if they have NOT been linked yet, and then to link or manually correct the information. If someone has married, divorced, been widowed, had a child, etc., require the student to contact FAP with documentation so that FAP can make the needed corrections. It would be helpful if a student wasn't allowed to make corrections to the FAFSA over 3 times; this would eliminate a many multiple transactions that don't really change anything, or change too much after the fact.</p> <p>13. Consider expanding the NSLDS info on SAR so that checking the UEH isn't so time consuming (i.e. listing institutions along with the loans, Pell LEU, etc.). With the 600% Pell, 150% sub, UEH, defaults, Selective Service, high school completion, & 5 kinds of verification, it takes longer and longer to check & complete files.</p>		<p>13. No Change. The Department of Education believes the information provided in this section of the <i>Student Aid Report (SAR)</i> is adequate. The purpose of the SAR is to provide information about a processed <i>Free Application for Federal Student Aid (FAFSA®)</i>. The SAR includes a link to the National Student Loan Data System (NSLDS®) so applicants can access their financial aid history. To include the totality of this information on the paper SAR is impractical and would place undue burden to the public.</p>
38.	<p>Our comments will concentrate on the following areas: “Enhancing the quality, utility, and clarity of the information to be collected and minimizing the burden of this collection on the respondents, including the use of information technology. “</p> <p>MINIMIZING THE BURDEN OF COLLECTING FINANCIAL AID DATA FROM STUDENTS AND THEIR PARENTS</p> <p>It has been the stated goal of Congress and the Education Department to reduce the amount of time and items that have to be completed on the FAFSA on the WEB form without compromising the accuracy of the information needed to determine students' eligibility Title IV funds.</p> <p>In light of the above goal our suggestions area as follows:</p> <p>Student Section of the FAFSA</p> <p>1. Change the order of questions asked so that they appear in a more logical sequence and, depending on the answers, enable students to skip unnecessary questions.</p>	Daniel Sharon, Monroe College, Bronx, New York	<p>1. No Change. <i>FAFSA on the Web (FOTW®)</i> was designed to display questions in a particular order to reduce the number of questions applicants must answer. Some answers pre-fill and other questions don't display at all based on answers to questions asked earlier in the application.</p>

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	<p>2. Dependency questions (now Step Three) should become Step Two following the student’s demographic questions. In this way students know immediately if they are going to be considered Independent or Dependent.</p> <p>3. If Independent, the skip logic should take the student to what is now Step Five – Student’s household size and number in college.</p> <p>This should then be followed by question 97 regarding payments from federal programs.</p> <p>Rational:</p> <ul style="list-style-type: none"> • Independent students would be able to go directly to the household size and number in college section. • This would be followed by question 97. All students would have to answer this question. • Many independent students who are not working and filing taxes do not get the opportunity to answer question 97 which asks if the student or his/her spouse receive benefits from any of the federal programs listed. If they file taxes, but do not file a 1040, question 97 is not shown to the applicant. • If students do not have the opportunity to answer question 97 and they do not report any other income or a very low taxable income, they are increasingly flagged as a V6 verification. Such students are now required to go through the verification process, creating an additional burden for them as well as the institution. • If they are not chosen for verification, the institution may still require more income documentation because the reported income is so low and there is no way for the student to report the receipt of support from a federal program. • We are now adding a burden to the student and the institution. Having question 97 come up before any tax information is requested would reduce the burden for the non-filing independent student and the institution on the back end because answering yes to any of the items in question 97, would result in an Auto Zero EFC. 		<p>2. No Change. <i>FAFSA on the Web</i> (FOTW®) was designed to flow logically while incorporating skip logic wherever possible. The current Step Two (School Selection) is required of all applicants, so it is presented early in the application. The determination of a student’s dependency status impacts the applicant’s experience throughout the rest of the form.</p> <p>3. No Change. In <i>FAFSA on the Web</i> (FOTW®), the student’s household size and number in college questions display as soon as the applicant is determined to be independent.</p> <p>The purpose of Question 97 is to assist in determining an independent student’s eligibility for the simplified needs test. This question displays after the AGI and income earned from work questions because a student cannot qualify for the simplified needs test unless the reported income amount is below the threshold. If income is above the threshold, or if the applicant qualifies for the simplified needs test based on type of tax return filed or dislocated worker status, the answer to Question 97 is not needed to determine eligibility.</p> <p>The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process. The verification selection process is separate from the application process and takes place after the <i>Free Application for Federal Student Aid</i> (FAFSA®) has been submitted.</p>

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	<p>Parent Section:</p> <p>4. Positive Change: Moving Question 75 so that it is now before the income tax question. Are we correct in assuming that this means that the question will have to be answered regardless of whether parents file taxes. This will enable students whose families do not file taxes to skip the tax questions yet still indicate their income source. It also sends the message to students from families who rely on government programs and do not file taxes that the FAFSA and college applies to them.</p> <p>Thank you for this change.</p> <p>Reporting Tax Information: Our suggestions for entering income on the 2016-17 FAFSA on the WEB version is as follows:</p> <p>5. Have students enter information in the order that follows page 1 and 2 of an average tax return:</p> <p>Question 1 – Adjusted Gross Income (Page 1 of 1040 and 1040A and 1040Ez) Question 2 Exemptions (Always on first page.) Question 3 Wages (Still on first page, but has to be separated out if spouse is involved. Question 4 Taxes paid (On page 1 or 2 depending on type of return filed.) If student taxes paid is the same as AGI, a pop-up error that cannot be bypassed should be in place. It is our belief that changing the order of these questions will improve the flow of data entry because it will follow the actual order of a tax return, reducing the need for a student or parent to have to go back and forth between pages.</p> <p>Link to State Applications: This refers to the FAFSA on the WEB process.</p> <p>6. Move messaging and reminder to complete a state application for financial aid from student demographic page to Sign and Submit page for the following reason: Right now the messaging reminding students to complete their state application is offered too early in the application process. Applicants need to be reminded to link to</p>		<p>4. Thank you for your comment.</p> <p>5. No Change. In <i>FAFSA on the Web</i> (FOTW®), the AGI and income earned from work questions display on the page that collects information to determine the applicant’s eligibility for the simplified needs test. If the applicant qualifies for the simplified needs test, exemptions and taxes paid are not required, so are not presented to the applicant unless required by the student’s reported state of legal residence.</p> <p>The process of reporting information from a tax return is simplified for those applicants and parents who use the IRS Data Retrieval Tool.</p> <p>6. No Change. The Department of Education believes the current placement of the message is adequate.</p>

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	a state application as they are about to sign and submit their FAFSA.		
39.	<p>Thank you for the opportunity to comment on the upcoming 2016-17 Free Application for Federal Student Aid (FAFSA). Our comments on this FAFSA concern a processing consideration rather than actual application text.</p> <p>PHEAA understands that the U.S. Department of Education (USDE) is considering masking the order of the school choices that a student provides on the FAFSA when delivering FAFSA information to State Grant agencies. PHEAA, as the administrator of the nation's third largest need-based state grant program, is concerned that this action could cause an undue hardship on students who would have to reconfirm their school choices with our agency in order to finalize their state aid eligibility. PHEAA receives more than 600,000 FAFSAs a year from Pennsylvania students. The masking, or re-ordering, of a student's choice of college on the FAFSA for the purpose of distribution of funds would likely result in students receiving notice of an incorrect grant if reconfirmation of school choice is not received by the student. In Pennsylvania, 84 percent of state grant applicants attend the school that was listed as their first choice on the FAFSA. Failing to provide state grant agencies with an ordered list of school choices will place an extra burden of reconfirmation and cause unnecessary confusion for those low-income students who benefit the most from Pennsylvania State Grant dollars.</p> <p>PHEAA believes that state grant agencies should not be subject to these new configurations being considered by USDE. Rather, the state grant agencies that process preliminary grant awards based on the first school choice need this information to produce the most accurate award, while minimizing the burden to the student. We, therefore, request USDE to maintain the current method of transmitting school choice information to state grant agencies.</p>	Christine Zuzack, PHEAA, Harrisburg, PA	While the list of colleges will no longer be included on the ISIR sent to schools, there is no change to the way the college list will be reported to State Agencies for 2016-2017.
40.	<p>In response to the Federal Register notice published on August 12, 2015, I am writing to provide comments by Veterans Education Success on the draft paper and online versions of the Free Application for Federal Student Aid (FAFSA) that the Secretary proposes to use for the 2016-17 award year. Veterans Education Success is a non-profit organization dedicated to preserving the integrity and promise of the GI Bill.</p> <p>Veterans Education Success believes that the Department should restore the questions about service member and veteran status for all applicants. Although this change was not made prior to releasing the draft for public comment, we request that the</p>	Walter Ochinko	No Change. The purpose of Questions 46 through 58 is to determine the applicant's dependency status. In an effort to simplify the application and reduce burden, the Department of Education implemented logic in <i>FAFSA on the Web</i> (FOTW®) that prevents all remaining dependency questions from displaying once an applicant is determined to be independent.

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	<p>Department do so before finalizing the 2016-17 FAFSA. We remain convinced that such a change is both good and necessary public policy.</p> <p>Because the FAFSA uses a "skip-logic" function to simplify completion, many service members and veterans never have the opportunity to self-identify. Instead they are automatically skipped past the active duty and veteran status questions based on their answers to earlier questions about their dependency status (including age, degree-level, and marital status). While we recognize and applaud the overall benefits of FAFSA simplification, the questions about military background are easy to answer in a matter of seconds.</p> <p>We believe that the use of a skip logic function on the active duty and veteran status questions works to the detriment of this cohort. First, it limits the ability of states and colleges to target their outreach to service members and veterans as early as possible in the aid application process. Second, it precludes any exploration of their borrowing patterns or indebtedness and subsequently, their repayment status.</p> <p>Why is this important? The Higher Education Opportunity Act of 2008 prohibits schools from considering GI Bill benefits when determining veterans' eligibility for federal grants and loans. As a result, some veterans are deemed eligible for federal grants and loans covering up to the full cost of attendance as well as their Post-9/11 GI Bill benefits. A potential unintended consequence is that some veterans may incur burdensome debt. The Department of Veterans Affairs has paid over \$50 billion in Post-9/11 GI Bill benefits since August 2009, yet Congress lacks data to assess the extent to which veterans are incurring federal student loan debt. With military background information, the Department of Education will be able to fill in data gaps on the federal debt loads and repayment status of individuals using the Post-9/11 benefit.</p> <p>Additionally, we also ask that the Department review questions about active-duty or veteran status to ensure that federal student aid applicants are correctly classified. For example, it may not be clear how individuals in the reserves, who are subject to periodic activations, should answer. Perhaps, rewording the options to read "recurring military service" and "discharged veteran" might resolve any confusion. Or, if this is not feasible, the relevant notes and "Help and Hints" sections could be clarified.</p> <p>Thank you in advance for taking steps to provide important data to help ensure that</p>		

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	service members' and veterans' post-service college careers are not compromised by undue financial burdens.		
41.	Unfortunately, as we all know, families often do not read the instructions for filling out the FAFSA. Over the past several aid years, we have averaged over 300 requests for clarification of marital status of parents, many of which are caused by the confusion this question engenders. We would like to recommend that since the vast majority of FAFSAs are now completed electronically, that the question be broken down into multiple questions online, with skip logic being used to drive families to the correct status. If that is not an option, we suggest that the wording of the question be changed to something such as: "As of today, if your legal parents are not divorced or separated, what is their marital status? Otherwise, see the note on page 10". While we understand the need to keep the questions concise, we would like your assistance in reducing the confusion amongst applicants by changing the wording to ask the correct question. Thank you for helping to simplify the process of applying for financial aid for the families we collectively serve.	Victor Goldberg	Refer to comment #13 for resolution.
42.	My institution is part of a 6 public university system in South Dakota in which all campuses have their own school code, but all share one TG number for import and export purposes. A central office imports and exports all ISIR records for the 6 universities as well as export and import of records to COD. Our current processes were fully implemented in the fall of 2003 as a means of cost savings and eliminating duplicative effort for processing by each campus and our central office. We also have a central office that performs the Verification process and all communication in this regard with students and their families on behalf of the 6 universities. With this central office receiving one ISIR record for each student, cost savings and eliminating of duplicative mailing of the same documents to multiple institutions within our state system is realized for students and their families. Eliminating the current practice of listing all school codes on the FAFSA our central office receives will assuredly drive up costs, increase exponentially processing time for the importing of records and delay the timely processing of ISIR records selected for Verification. We implore those who will make this final decision to not lumped all institutions into "guilt by association" when not all of us are misusing the information!	David Martin, Rapid City, South Dakota	Refer to comment # 8.3 for resolution.
43.	With regards to question 59: "As of today, what is the marital status of your legal parents?", the University of Colorado Boulder would like to state that the question is being asked incorrectly, and in our own experience has led to many erroneous responses. While the note above question 59 states that if your parent is remarried (among other conditions) see the note on page 10, many families do not refer to the note on page 10 as the wording of the question is quite clear. If a student whose legal	Victor Goldberg	Refer to comment #13 for resolution.

#	Comment(s)	Commenter	Resolution
	<p>parents are divorced lives with one of their legal parents, the answer to question 59 is often "Divorced", even if the parent is remarried, which is, of course, the wrong answer. Unfortunately, as we all know, families often do not read the instructions for filling out the FAFSA. Over the past several aid years, we have averaged over 300 requests for clarification of marital status of parents, many of which are caused by the confusion this question engenders. We would like to recommend that since the vast majority of FAFSAs are now completed electronically, that the question be broken down into multiple questions online, with skip logic being used to drive families to the correct status. If that is not an option, we suggest that the wording of the question be changed to something such as: "As of today, if your legal parents are not divorced or separated, what is their marital status? Otherwise, see the note on page 10". While we understand the need to keep the questions concise, we would like your assistance in reducing the confusion amongst applicants by changing the wording to ask the correct question. Thank you for helping to simplify the process of applying for financial aid for the families we collectively serve.</p>		
44.	<p>We are part of a state multi-university system that receives all ISIR records through one TG mailbox. Eliminating the ability to view all school codes on an ISIR will make programming difficult and increase inefficiencies, redundancies, and delays in importing the records into our student information system.</p>	Anonymous	<p>Refer to comment #8.3 for resolution.</p>
45.	<p>We are a multiple institution state system where each of the institutions has its own school code, but all share one TG number. Removing the individual school codes will require significant and costly processing changes for our system . Our preference would be to leave all school codes viewable by all schools.</p>	Anonymous	<p>Refer to comment #8.3 for resolution.</p>
46.	<p>1. Students are confused about how to answer FAFSA questions when their parents do not live together (whether or not they are married). To alleviate confusion and help the student determine which parent(s) information should be included on the application when their parents don't live together, consider changing the parents' marital status questions to a series of questions, such as: -What is the current marital status of the student's biological or adoptive parents? -Which of the student's biological or adoptive parents did the student live with more during the past 12 months? -Which parent provided more financial support to the student during the past 12 months? -What is the current marital status of the student's parent(s) whose information is being provided on this application?</p> <p>2. Students continue to misunderstand the Prior Bachelor's Degree question. We suggest that the FAFSA include a definition of what a bachelor's degree is in the help text, such as: -A bachelor's degree or baccalaureate (from Modern Latin</p>	Anonymous	<p>1. Refer to comment #13 for resolution.</p> <p>2. No Change. The Department of Education needs to further assess this recommendation. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>

#	Comment(s)	Commenter	Resolution
	<p>baccalaureatus) is usually earned for an undergraduate course of study lasting three to five years (depending on institution and field of study).</p> <p>3. Students continue to misunderstand the question asking if they have any legal dependents. We suggest that the FAFSA include a definition of what a dependent is in the help text, such as: -A dependent is a person who relies on another, especially a family member, for financial support.</p> <p>4. Students are confused by question 44d regarding taxable student grant and scholarship aid reported to the IRS in their AGI. Students don't understand they should be reporting gift aid in excess of tuition, fees, books and supplies as income to the IRS. Neither the question nor the help text clarify what is meant to be reported here. Although the help text lists certain types of income that are commonly reported, what is missing is that the gift aid must be in excess of tuition, fees, books and supplies. We suggest including an explanation in the help text to be more specific about when grant and scholarship aid should be reported to the IRS.</p> <p>5. As proposed, schools will no longer be able to see which colleges are also receiving a student's FAFSA. As such, if we wanted to correct a FAFSA for our school only, and remove the other school codes, we won't be able to do this. Can you add an button or option that allows a school to make a regular correction (i.e.: not a PJ correction) that is sent only to the school that is making the correction (if that is what the school wants to do?)</p>		<p>3. No Change. The Department of Education believes the current instructions provide adequate guidance.</p> <p>4. Refer to comment #20 for resolution.</p> <p>5. Refer to comment # 8.3 for resolution.</p>
47.	<p>My institution is part of a 6 university system in which all campuses have their own school code, but all share one TG number for import and export purposes. A central office imports and exports all ISIR records for the 6 universities as well as export and import of records to COD. Our current processes were fully implemented in the fall of 2003 as a means of cost savings and eliminating duplicative effort for processing by each campus and our central office. We also have a central office that performs the Verification process and all communication in this regard with students and their families on behalf of the 6 universities. With this central office receiving one ISIR record for each student, cost savings and eliminating of duplicative mailing of the same documents to multiple institutions within our state system is realized for students and their families. Eliminating the current practice of listing all school codes on the FAFSA our central office receives will assuredly drive up costs, increase exponentially processing time for the importing of records and delay the timely processing of ISIR</p>	Carolyn Halgerson	<p>Refer to comment # 8.3 for resolution.</p>

#	Comment(s)	Commenter	Resolution
	records selected for Verification.		
48.	Thank you for letting us comment on the changes to the FAFSA. I also have concerns about our state system as well as we have one TG number for multiple institutions. Besides reprogramming, it will cause duplicate processing for each school record coming into our system. I respectfully ask that we would wait until at least the 17-18 year to make this change, giving us sufficient time to analyze how to best make these changes within our system.	Anonymous Anonymous	Refer to comment # 8.3 for resolution.
49.	<p><u>1. What is the FAFSA?</u></p> <p><u>“How do I find out what my Expected Family Contribution (EFC) is?”</u></p> <p>We recommend adding the following language in italics to the last sentence of the “How do I find out what my Expected Family Contribution (EFC) is?” section on page 2 for clarification:</p> <p style="padding-left: 40px;"><i>You can make corrections or provide additional information, as necessary, online at www.fafsa.gov or by following the instructions on page 5 of your SAR.</i></p> <p>Space constraints understandably limit the amount of information on the paper form, but applicants would benefit from knowing a little more about what to expect after submitting the paper FAFSA. It would be helpful for this section to briefly explain the next steps in the aid process: after filling out the FAFSA, students will receive a Student Aid Report (SAR), which summarizes the data they submitted on the FAFSA and provides information on federal aid eligibility. Later, they will receive financial aid award letters from colleges where they apply and are accepted, with more details about all the aid for which they qualify. The Department has already recognized the need for such information by answering the question, “Who will I hear from, and when?” at http://studentaid.ed.gov/fafsa/next-steps#who-will-i-hear-from-and-when.</p> <p><u>2. “How much aid will I receive?”</u></p> <p>In addition to the brief, general references currently in “Filling Out the FAFSA” on page 1 and “How much aid will I receive?” on page 2, we urge the Department to explore taking further steps to help inform students that they should contact college financial aid offices if they have experienced significant changes in their financial situation that could affect their aid eligibility.</p>	Lauren Asher, TICAS	<p>1. No Change. Instructions for making corrections are provided on the Student Aid Report (SAR).</p> <p>2. Refer to comment #30.3 for resolution.</p>

#	Comment(s)	Commenter	Resolution
	<p>Step Three (Student)</p> <p>3. Questions 49 and 50: Active duty service members and veterans of the U.S. armed forces</p> <p>Because FOTW uses a “skip-logic” function to simplify completion, many service members and veterans never have the opportunity to identify their status when they apply for federal student aid. Instead, those who are identified as independent students based on their answers to earlier questions about their dependency status (including age, degree level, and marital status) never see the active duty and veteran status questions.</p> <p>While we recognize and applaud the overall benefits of FAFSA simplification, the questions about military background are both important and easy to answer in a matter of seconds. We recommend that these questions be restored for all FOTW users, as U.S. Senators Carper and Hirono requested in a letter to Secretary Duncan on July 30, 2014. Veterans Education Success also requests this change in comments submitted on October 9, 2015.⁴ There is already precedent for doing so with the foster youth screening question that is asked of both independent and dependent applicants in the student eligibility section of FOTW.</p> <p>This change would increase the ability of states and colleges to conduct targeted outreach to veterans and service members who may be eligible for additional aid and/or services, and would also improve the available data on federal student aid usage by veterans and service members.</p> <p>4. Questions 56-58: Unaccompanied homeless youth</p> <p>For several years, we have urged the Department to make it easier for students using the paper FAFSA to understand what they are being asked. Instead of asking three separate questions in the paper FAFSA to try to capture the various ways an applicant might qualify as an independent student due to being homeless or at risk of homelessness, the paper form should ask just one simple question – as FOTW already does – accompanied by a more detailed Notes section. Specifically, we recommend replacing questions 56, 57, and 58 – which are long, confusing, and still do not cover all of the potential combinations of status and source of determination – with the following single question, which is already used as a filtering question in FOTW:</p>		<p>3. Refer to comment #40 for resolution.</p> <p>4. No Change.</p>

#	Comment(s)	Commenter	Resolution
	<p>On or after July 1, [relevant year], were you homeless or were you self-supporting and at risk of being homeless? (See Notes on p. for how to answer this question.)</p> <p>The new question would be accompanied by a reference to the Notes section, and the first paragraph of the Notes for this question would read:</p> <p>Answer “Yes” if you received a determination at any time on or after July 1, [relevant year], that you were an unaccompanied youth who was homeless, or self-supporting and at risk of being homeless, from any of the following sources:</p> <ul style="list-style-type: none"> - Your high school or school district homeless liaison. - The director, or designated staff, of an emergency shelter program funded by the U.S. Department of Housing and Urban Development. - The director, or designated staff, of a runaway or homeless youth center or transitional living program. - A financial aid administrator at the school you attend or plan to attend. <p>In response to our October 2014 comments,⁵ the Department wrote, “[i]t was determined that creating three separate questions would provide for the least amount of confusion on the applicant’s part, allow for better follow-up on the part of the financial aid administrator, and allow the Department of Education to better understand the population of applicants who answer ‘Yes’ to any of the three questions.” We urge the Department not to make the perfect the enemy of the good and be consistent with its use of a single, easily understood screening question, as used in FOTW. If the Department would like to collect information on which source can confirm the applicant’s homeless status, the question should only be required of applicants who first answered ‘yes’ to the simpler, single screening question. Whichever approach the Department takes, we encourage the Department to test these questions with the target population and solicit feedback from those who work with homeless and at-risk youth.</p>		<p>5. Refer to comment #13 for resolution.</p>

#	Comment(s)	Commenter	Resolution
	<p><u>5.</u> Step Four (Parent)</p> <p>Questions 59, 61-64, and 65-68</p> <p>We appreciate that the Department has developed additional consumer resources including an infographic to assist students whose parents are “unmarried and both parents living together” in answering questions 80-94, as we recommended in our June 2013 and October 2014 comments. However, the instructions on page 6 and page 10 (Notes for Step Four, questions 59-94) of the paper FAFSA refer students to 1-800-433-3243. Students unable to call during the operating hours for that hotline (Monday-Friday, 8am-10pm ET) or with frequently asked questions would benefit from user-friendly online information, so we suggest including the URL for the parental infographic in the instructions as well, which could also reduce the need for phone assistance.</p> <p>Notes</p> <p><u>6.</u> Notes for questions 56-58</p> <p>Since 2008, we have urged the Department to revise the Notes for questions 56-58 as follows to simplify the application process for homeless youth and maintain consistency with legislative intent and the definition the Government Accountability Office used in its study on disconnected youth⁷:</p> <ul style="list-style-type: none"> • “Youth” means you are 21 23 years of age or younger... <p>We are very pleased that this problem appears to have been fixed, correcting an unfair loophole that previously prevented homeless and at-risk youth aged 22 and 23 from being granted independent student status. The Department has already clarified this in both its Application and Verification Guide⁸ and guidance to colleges, and we want to ensure that both the paper FAFSA and FOTW are adjusted to reflect this change. Specifically, the Department’s July 29, 2015 Dear Colleague Letter states:</p> <p>“Applicants who are between the ages of 21 and 24 and who are unaccompanied and homeless or self-supporting and at risk of being homeless qualify for a homeless youth determination, and will be considered independent students.”</p>		<p>6. No Change. The <i>Free Application for Federal Student Aid (FAFSA®)</i> definition for youth is set at age 21 to be consistent with the Runaway and Homeless Youth Act. Applicants aged 22 and 23 are considered to be independent if a financial aid administrator makes a determination that the student is homeless or at risk of being homeless.</p> <p>The purpose of Dear Colleague Letter GEN-15-16 is to clarify institutional and applicants' roles and responsibilities related to Title IV dependency determinations for unaccompanied homeless youth. The letter does not redefine the FAFSA definition of "youth", but frequently refers to the classification of an "unaccompanied homeless youth" as is defined in section 725 of the McKinney-Vento Homeless Assistance Act. Additionally, the letter clarifies how to make a homeless youth determination when an applicant CANNOT answer "yes" to the FAFSA questions (for reasons that may include the fact that they do not meet the FAFSA definition of youth).</p> <p>Specifically, the letter states "If an applicant believes that he or she is homeless or at risk of being homeless but is unable to answer “yes” to any of the previously noted FAFSA questions, the applicant should contact his or her financial aid office to request that a homeless youth determination be made by an FAA....."</p> <p>7. No Change. The Department of Education believes the current guidance on the confirmation page, along with the guidance provided on the <i>Student Aid Report (SAR)</i>, is adequate.</p>

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	<p data-bbox="225 159 559 191"><u>7. FAFSA Submission Page</u></p> <p data-bbox="177 232 1171 472">We commend the Department for improving the information on the confirmation screen seen by applicants who answer 'yes' to the foster youth screening question. However, the additional information about potential added grant assistance for current and former foster youth is currently buried at the bottom of the page. We recommend moving that information up so that it is included along with other potential aid that applicants may receive such as Pell Grants and Direct Stafford Loans.</p> <p data-bbox="225 548 599 581"><u>8. The IRS Data Retrieval Tool</u></p> <p data-bbox="190 621 1204 1003">We applaud the Department for continuing to improve the IRS Data Retrieval Tool (DRT), and for highlighting the tool in draft materials for the 2016-17 cycle. However, these materials could further emphasize the tool's benefits and ease of use. We strongly encourage the Department to mark the questions on the paper FAFSA that could be prepopulated using the DRT, which could encourage applicants to shift from paper to FOTW to benefit from the DRT. We understand that the scope of the data transferred from the IRS DRT is dependent on the type of tax return filed, however, the FAFSA can simply indicate with asterisks which questions <i>could</i> possibly be prepopulated using the tool. If the Department is developing an FOTW Worksheet for 2016-17, it should also note which questions could be answered with the DRT.</p>		<p data-bbox="1618 375 2542 508">8. No Change. When an applicant or parent uses the IRS Data Retrieval Tool (IRS DRT) to retrieve tax information from the IRS, the data that is transferred to and displayed on the <i>Free Application for Federal Student Aid</i> (FAFSA®) differs, depending on which tax return the applicant, or parent, filed.</p> <p data-bbox="1618 553 2556 613">When a 1040EZ is filed, the following fields are populated in <i>FAFSA on the Web</i> (FOTW®):</p> <ul data-bbox="1618 659 1983 829" style="list-style-type: none"> • Type of tax return filed • Adjusted gross income • Taxes paid • Exemptions • Income Earned from Work <p data-bbox="1618 873 2529 906">When a 1040 or a 1040A is filed, the following fields are populated in FOTW:</p> <ul data-bbox="1618 946 1999 1295" style="list-style-type: none"> • Type of tax return filed • Adjusted gross income • Taxes paid • Exemptions • Income earned from work • Education credits • IRA deductions • Tax-exempt interest income • Untaxed IRA distributions • Untaxed pension <p data-bbox="1618 1341 2529 1438">Since the data that can be transferred from the IRS DRT is dependent on the type of tax return filed, the Department of Education believes that the guidance currently provided is adequate.</p>

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	<p>9. <u>Additional suggestions for improvements related to the DRT</u></p> <p>We suggest the Department add the following explanation before presenting aid applicants with questions related to the DRT: <i>Please answer the following questions to determine if you are eligible to electronically transfer your own tax information into the FAFSA. Using the IRS Data Retrieval Tool shortens the time it takes to complete the FAFSA because your tax data automatically answers up to 20 financial questions.</i> For users who are told they cannot use the DRT, we urge the Department to ensure they are also told <i>why</i> (e.g., they filed their taxes too recently), and that they can return and try again, and approximately how soon, when appropriate. Because such messages have not been included in this information collection, it is unclear what information applicants receive. We recommend the Department include DRT-related messages and screenshots in the FAFSA Application Enhancements Summary that it issues during its annual comment period.</p> <p>10. We urge the Department to work with the IRS to explore extending the substantial benefits of the DRT process to more applicants and potential applicants, as discussed in our comments from previous years. In its current form, the DRT draws data only from IRS 1040 forms, not from the W-2 or 1099 forms that can provide important earnings information for those who do not file a 1040 because they earn too little to owe federal income tax. Almost three-quarters of Pell Grant recipients have incomes so low that they do not owe federal income tax, as discussed in more detail in our report, <i>After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid.</i>¹⁰ The forthcoming use of prior-prior year tax data will facilitate the use of W-2 and 1099 data, which can take longer for the IRS to process than 1040 data. The Department has stated that it will have conversations to explore this issue, and we look forward to learning about the status of those discussions.</p>		<p>9. Refer to comment #20 for resolution.</p> <p>10. The Department of Education will continue its collaboration with the Internal Revenue Service (IRS) to explore ways in which to further enhance the IRS Data Retrieval Tool.</p> <p>11. Refer to comment #49.10 for resolution.</p>

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	<p>11. As detailed in our February 2015 memo, we also encourage the Department to explore expanding the categories of tax filers who can use the DRT.¹¹ Currently, certain types of tax filers cannot use the DRT to transfer tax data to their FAFSAs due to their tax filing status. These include tax filers who are married but file separate tax returns, those who file as head of household, parents who are unmarried and living together, those who file amended tax returns, those who file Puerto Rican or foreign tax returns, and those who changed marital status since Dec 31 of the prior year. To allow more FAFSA applicants to benefit from using the DRT, we recommend exploring whether the DRT can be made available to more categories of tax filers, and whether the use of prior-prior year data will make it easier to add certain categories of tax filers, i.e., if some filers are currently excluded due to longer processing times for their particular type of return.</p> <p>12. We continue to encourage the Department to consider how the DRT could be integrated into the FAFSA4caster so that the user has the option of a more precise aid estimate, in addition to the current format. Since the FAFSA4caster does not currently collect personally identifiable information, users could opt to share the necessary information to access the DRT if they would like to. This would not only help provide early aid eligibility estimates to students and parents just beginning to explore college options and affordability, but also make them aware of the DRT well before they face the FAFSA itself.</p> <p>13. As described in more detail below, we recommend that the Department provide at least screenshots, if not a demo site, for future planned enhancements to FOTW, including the IRS DRT features, to facilitate public input before they are finalized.</p> <p>14. The FAFSA Public Comment Process We urge the Department to <i>release draft FOTW materials at the same time as the draft paper FAFSA and to encourage public review</i> so that students, financial aid administrators, and other stakeholders can provide the Department with important, timely, and coordinated feedback on these interrelated forms and processes.</p> <p>We understand that updating FOTW is a substantial undertaking. In response to our comments on the 2015- 16 draft FAFSA, the Department shared that the demo site was expected to be available on December 28, 2014, only four days before the</p>		<p>12. No Change.</p> <p>13. Refer to comment #3.1 for resolution.</p> <p>14. Refer to comment #3.1 for resolution.</p>

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	<p>application itself became available. Given that almost all (more than 99%) FAFSAs are now expected to be filed online,¹² we continue to urge the Department to make a preview version of FOTW available during the public comment period, to provide stakeholders the opportunity to weigh in on proposed changes and suggest improvements. Some information about FOTW is available in the “Data Elements and Justification” chart, but these textual descriptions of aspects of the online application are of limited use without an accompanying visual depiction of how applicants work their way through the process. Moreover, they do not provide the text used to determine IRS Data Retrieval Tool eligibility or the responses received by applicants. Instead, a dynamic Data Elements Justification chart could include links to static images with the actual text that applicants receive.</p>		
50.	<p>We have focused our comments on the single most significant of these barriers: the FAFSA’s definition of “youth.” Based on persistent implementation problems and inconsistency with recent guidance from the Department of Education (ED), we strongly recommend changing the definition of youth on page 10 of the FAFSA to include applicants 23 years of age or younger.</p> <p>The CCRAA and Unaccompanied Homeless Youth</p> <p>The CCRAA established that FAFSA applicants are considered independent students if they are verified as unaccompanied and homeless during the school year in which the application is submitted, or as unaccompanied, at risk of homelessness, and self-supporting, with no regard to the applicant’s age.¹</p> <p>Specifically, the statute amended the definition of independent student to include any youth who “has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act), or as unaccompanied, at risk of homelessness, and self-supporting, by--</p> <p>(i) a local educational agency homeless liaison, designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act;</p> <p>Recommended Change to the FAFSA</p> <p>The CCRAA provides a clear, specific definition of “unaccompanied youth”, by referencing the definition in the McKinney-Vento Homeless Assistance Act. That</p>	Barbara Duffield, NAEHCY	Refer to comment #49.6 for resolution.

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	<p>definition does not include an age limit. For financial aid purposes, applicants generally are considered “dependent” until they turn 24. Therefore, it follows logically that the CCRAA’s independent student provisions should cover unaccompanied youth until they turn 24.</p> <p>On July 29, 2015, the Department of Education issued a Dear Colleague letter clarifying that, in fact, the CCRAA’s independent student provisions do cover unaccompanied youth until they turn 24.2 Specifically, the letter states:</p> <p>“Applicants who are between the ages of 21 and 24 and who are unaccompanied and homeless or self-supporting and at risk of being homeless qualify for a homeless youth determination, and will be considered independent students.”</p> <p>Unfortunately, in the notes on page 10 for questions 56-58, the 2016-2017 FAFSA continues to define “youth” as applicants 21 years of age or younger. This definition conflicts with the CCRAA and the July 29 Dear Colleague letter. It places financial aid administrators in the untenable position of attempting to process applications under two conflicting definitions of “youth.”</p> <p>In fact, this conflict already is causing confusion among financial aid administrators and students. For example:</p> <p>A financial aid administrator informed a student that he could be classified as an unaccompanied homeless youth for the 2015-2016 academic year since he was 21 years old; however, she also informed him that for the 2016-2017 academic year, he would need to complete a Dependency Status Appeal since he would no longer be considered an unaccompanied homeless “youth.” This directive contradicts the guidance shared in the Dear Colleague Letter.</p> <p>Another financial aid administrator recently contacted the NAEHCY Higher Education Helpline indicating that based on ED’s recent Dear Colleague Letter, one of her 22-year- old students now would qualify as being an unaccompanied homeless youth. Previously, the student would have had to complete a Dependency Status Appeal based on the student’s age. The financial aid administrator was unsure how to update the student’s dependency status in her school’s financial aid system, because the system was not taking the student’s age into consideration when she attempted to</p>		

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	<p>make the student independent.</p> <p>To rectify this confusion, provide clarity for financial aid administrators, and ensure that all unaccompanied homeless youth obtain the financial aid to which they are entitled, we strongly recommend that the notes on page 10 of the 2016-2017 FAFSA defines “youth” as 23 years of age or younger. We also strongly recommend that the 2016-2017 Application and Verification Guide use the same definition.</p>		
51.	<p><u>Foster Youth and the Consolidated and Further Continuing Appropriations Act of 2015, Public Law No: 113-235</u></p> <p>Our recommended changes to the FAFSA follow directly from section 308 of the Consolidated and Further Continuing Appropriations Act of 2015, Public Law No: 113-235, which requires that the Department of Education (ED) do the following:</p> <ul style="list-style-type: none"> (1) modify the Free Application for Federal Student Aid described in section 483 of the HEA so that the Free Application for Federal Student Aid contains an individual box for the purpose of identifying students who are foster youth or were in the foster care system; (2) utilize such identification as a tool to notify students who are foster youth or were in the foster care system of their potential eligibility for Federal student aid, including postsecondary education programs through the John H. Chafee Foster Care Independence Program and any other Federal programs under which such students may be eligible to receive assistance. <p>1. The lack of clarity in defining the key terms “dependent,” “in foster care,” or “ward of the court” in Question 53 prevents many youth and young adults from accurately being identified as independent students for the purposes of the FAFSA and puts them at risk for not accessing grants, assistance, and student support programs as P.L. No. 113-235 intended. The Notes for question 53 on Page 10 of the FAFSA provide some guidance but leave many questions unanswered and room for confusion. Providing a pop-up help box when a student arrives at question 53 with clear and immediate information about how to answer the question will not only streamline a student’s completion of the FAFSA, but will reduce the questions and calls that ED receives by providing clear information in a highly accessible direct format when the student is completing the FAFSA. In addition, providing a help box responds to the needs of former foster youth who may not have the assistance of parent or supportive adult as they navigate the</p>	Jennifer Pokempner	<p>1. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p>

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	<p>FAFSA. The help box highlights important information that is critical to notifying students of their eligibility and also ensures accurate completion of the application.</p> <p>2. Repairing the skip function for the independent student questions so that all students have an opportunity to identify as a “dependent,” “in foster care,” or “ward of the court” corrects a facet of the FAFSA which is currently at odds with P.L. No. 113-235 because the current format prevents students from arriving at “an individual box for the purpose of identifying students who are foster youth or were in the foster care system.” This modification will ensure that all former foster youth are identified and made aware of additional resources that will enable students to complete their post-secondary education.</p> <p><u>Recommendations for Changes to the FAFSA</u></p> <p>1. <u>3. Clarify Question 53 By Creating a Pop-Up Help Box To Define “Dependent,” “in Foster Care,” and “Ward of the Court.”</u> <u>The Pop-Up Box should include the following:</u></p> <ol style="list-style-type: none"> a. Explain that the student is being asked about former foster care status only for purposes of accessing and being provided information about financial aid and other assistance. b. Define the terms “dependent,” “in foster care,” and “ward of the court” and explain the various arrangements that may be included in these three terms. c. Clarify that the youth need not currently be dependent,” “in foster care,” or “ward of the court,” but only must have been at some time when they were age 13 or older even if they were subsequently adopted or entered a guardianship arrangement or other form of permanency. d. Clarify that this is a point in time eligibility status and that a discharge from the child welfare system to arrangements like guardianship or adoption do not jeopardize eligibility. e. Clarify the term “incarceration” in the context of juvenile justice system involvement (e.g., that it does not include home detention and other placements etc.) and that this exception applies only to those who are “currently” incarcerated and not prior to sentencing or once a youth is released, even if the youth is released on probation or parole. f. Provide a phone number to call to get help completing the FAFSA, 		<p>2. No Change. In 2015-2016, the following question was added to <i>FAFSA on the Web</i> (FOTW®): “Are you a foster youth or were you at any time in the foster care system?” If an applicant answers “yes” to this question, he or she is notified both on the confirmation page and on the <i>Student Aid Report</i> (SAR) that he or she may be eligible for assistance through federal programs for foster youth. This informational text includes a link to a web site where the applicant can find contact information for his or her state ETV coordinator.</p> <p>3. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p>

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<p>2.</p> <p>3.</p> <p>1.</p>	<p>including answering Question 53 properly.</p> <p><u>Please note that the commenters are willing to work with ED to draft language to include in the pop-up box. The commenters include advocates and practitioners from across the country who will be able to draft language that has the best chance of being helpful and informative to youth and young adults and will reflect varied terms used in different states.</u></p> <p><u>4. Eliminate the Skip Logic for “Independent” Student Status Questions So Foster Youth Are Accurately Identified in the Student Aid Report</u></p> <p>The current skip function in the questions about independent/dependent student status result in under-identifying youth who are or were “dependent,” “in foster care,” or a “ward of the court.” Currently, if a young adult answers “yes” to questions 46-52 about independent student status (married, in the military, have dependent, for example), the applicant will skip to Step Five (question 95) and will not be asked about their current or former foster care status. Even if these young adults were in foster care, they will not be identified as “dependent,” “in foster care,” or “ward of the court” in the Student Aid Report (SAR). Identifying as a former foster youth in the SAR assists institutions in informing young adults about their potential eligibility for additional financial aid and student supports and provides the education and child welfare field more accurate information to better serve these youth and young adults.</p> <p><u>5. A. Recommendations for Guidance</u></p> <p><u>1. Require that The Office of the Administration for Children and Families (ACF) of the Department of Health and Human Services (HHS) direct state child welfare agencies to work with ED to streamline and ease the process of verification of former foster youth status for the purposes of completion of the FAFSA.</u></p> <p><u>Rationale for Recommendation for Guidance 1</u></p> <p>Verification of former foster youth status remains a significant barrier to youth and young adults establishing their independent student status on the FAFSA and establishing eligibility for other vital sources of aid. Failure to secure proof jeopardizes access to financial aid and post-secondary education and training. Large numbers of youth and young adults do not have court orders and official documents proving their former foster youth status in their possession. Often, they are not provided the verification when they contact the child welfare agency that was responsible for their care because of poor record keeping, the absence of clear procedures for youth to access this documentation, high rates of staff turnover, and the transfer of cases between offices. ACF’s collaboration is essential for ED to meet the goals P.L. No. 113-</p>		<p>4. <u>Refer to comment #51.2 for resolution.</u></p> <p>In addition to notifying applicants who self-identify as current or former foster youth of the availability of additional resources, <i>Student Aid Report (SAR)</i> comments 165 and 166 can be used by schools as an indication of which students may benefit from additional outreach efforts. The SAR Comment Code and Text Guide can be found <u>here</u>.</p> <p>5. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p>

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	<p>235. State and county child welfare agencies have the capacity to identify the former foster youth status of youth who were in their care, but currently there is no direction or impetus for them to do so in an efficient and timely manner. Direction from ACF to develop systems and procedures to provide timely verification will not only assist ED in meeting its legal requirements, but will improve child welfare outcomes by facilitating access to higher education and training.</p> <p><u>6. Clarify in the 2016-2017 Application and Verification Guide the range of proof of status as a current or former dependent, foster care youth, or ward of the court that financial aid administrators must accept to establish eligibility.</u></p> <p><u>Rationale for Recommendation for Guidance 2</u></p> <p>As stated directly above, providing verification of former foster youth status can be an insurmountable barrier to accessing financial aid and higher education and training for current and former foster youth. ED notifies students in the Notes for Question 53 that “[t]he financial aid administrator at your school may require you to provide proof that you were in foster care or a dependent or ward of the court.” However, no direction is given to financial aid administrators or youth about what proof can be required and the range of options of acceptable verification.</p> <p>While a student can be required to make reasonable efforts to secure verification, it is unreasonable and inefficient to allow inflexible policies for verification to stand that prevent access to financial aid for students who are truly eligible, but are not able to secure documentation due to forces beyond their control. In addition, directing financial aid administrators to accept a range of documents that provide credible proof of former foster youth status will facilitate the completion and processing of the FAFSA without compromising accuracy.</p> <p>We recommend that guidance be provided in the Application and Verification Guide that requires institutions of higher education to:</p> <ol style="list-style-type: none"> 1. <u>Accept the following as verification of former foster youth status:</u> <ol style="list-style-type: none"> a. Copy of a court order documenting the student’s former foster youth status; b. Statement of state or county child welfare agency documenting the student’s former foster youth status provided in a letter, electronic mail, or verbally; c. Statement of a private provider agency that delivers child welfare services documenting the student’s former foster youth status 		<p>6. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p>

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	<p>provided in a letter, electronic mail, or verbally; or</p> <p>d. Statement from an attorney, guardian ad litem, or Court Appointed Special Advocate (CASA) documenting the individual's relationship to the student and the student's former foster youth status.</p> <p>2. <u>Require the following procedures if the students is not able to obtain documentation after making reasonable efforts:</u></p> <p>a. If the student is not able to obtain verification after demonstrating reasonable efforts to obtain such verification, the financial aid administrator should find the student eligible based on his or her self-attestation of former foster youth status.-The attestation should state why the student believes s/he qualifies, including the approximate dates the student was in foster care, dependent, or a ward of the court to the best of the student's knowledge.</p>		
52.	<p>1. <i>Develop an independent question to determine an applicant's foster care status separate from Question 53</i></p> <p>a. Utilize such identification as a tool to notify students who are or were foster youth of their potential eligibility for Federal student aid, including the John H. Chafee Foster Care Independence Program and any other Federal programs under which such students may be eligible to receive assistance.</p> <p>b. Eliminate the Skip Logic for earlier "Independent" status questions so all applicants are asked about their current or former foster care status and foster youth are accurately identified in the Student Aid Report</p> <p>2. <i>Improve Clarity of terms in Question 53</i></p> <p>a. Define the terms "dependent," "in foster care," and "ward of the court" and explain the various arrangements that may be included in these three terms.</p> <p>b. Clarify that the youth need not currently be dependent," "in foster care," or "ward of the court," but only must have been at some time when they were age 13 or older.</p> <p>c. Clarify that this is a point in time eligibility status and that a discharge from the child welfare system to arrangements like guardianship or adoption do not jeopardize eligibility.</p>	Sarah Wasch, Field Center for Children's Policy, Practice and Research at the University of Pennsylvania	<p>1. Refer to comment #51.2 for resolution.</p> <p>2. Refer to comment #51.1 for resolution.</p> <p>3. Refer to comment #51.3 for resolution.</p>

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	<p>3. Provide a pop-up help box with clear and immediate information about how to answer Question 53.</p> <p>a. To respond to the needs of former foster youth who may not have the assistance of parent or supportive adult as they navigate the FAFSA, a telephone number should be provided for immediate assistance.</p>		
53.	<p>Enhance the use of the Internal Revenue Service’s Data Retrieval Tool (IRS-DRT)</p> <p>The move to PPY will increase the number of applicants who are able to utilize the IRS-DRT, which is a key component in FAFSA simplification efforts. We encourage ED to continue its collaboration with the IRS, specifically exploring the following issues:</p> <p>1. Allow more tax filers to use the IRS-DRT. For example, allow applicants and parents who file separate returns to use the IRS-DRT by pulling the tax information by SSN and combining the data on the appropriate FAFSA questions. If we do not expand the use of DRT, some of the benefits of moving to PPY will be blunted.</p> <p>2. Confirm for the student, parent or spouse that there is no record of a tax return on file, rather than forcing the applicant to obtain this information from the IRS. Currently, students and/or parents who do not file a tax return may be required to provide documentation of such status. The IRS filing deadline for PPY is more than a year before the FAFSA becomes available, and providing this information via the IRS-DRT would reduce administrative burden for both students and schools.</p> <p>3. Make the IRS-DRT authentication process more lenient, while still retaining necessary information security. For example, the current process requires tax filers to input the exact address from their tax returns in order to retrieve IRS data. Students may move from year to year, and they find it difficult to remember their exact prior-year tax filing address, let alone the address needed for PPY data retrieval.</p> <p>4. Explore other authentication factors besides address that could be used, or perhaps lessen the address requirements. Explore the possibility of expanding the IRS-DRT to allow for the import of all relevant line items from IRS tax returns and W-2 forms. With the implementation of PPY, IRS systems should be up- to-date with the required information available to retrieve via the IRS-DRT.</p>	Justin Draeger, NASFAA	<p>1. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the Free Application for Federal Student Aid (FAFSA®).</p> <p>2. The Department of Education will continue its collaboration with the Internal Revenue Service (IRS) to explore ways in which to further enhance the IRS Data Retrieval Tool.</p> <p>3. Refer to comment #53.2 for resolution.</p> <p>4. Refer to comment #53.2 for resolution.</p>

#	Comment(s)	Commenter	Resolution
	<p>Availability of FAFSA Demo Site</p> <p>5. We encourage ED to make the FAFSA Demo Site available earlier in the processing cycle, especially for the 2017-18 award year. Historically, ED makes the demo site available no more than a week before the production site goes live in January. The use of PPY allows the FAFSA to be available in October, and accordingly, we expect to see the demo site in late September. Aid administrators have expressed concerns about such a short lead time for the demo site for a number of years, but with the implementation of PPY, the apprehensions increase. Practitioners want to ensure they fully understand the new FAFSA and have sufficient time to train their staff using the demo site, rather than try to correct errors on a student’s actual application.</p> <p>Communication</p> <p>6. School financial aid offices already are receiving inquiries from students and parents regarding PPY, including confusion about when the use of PPY would begin and if families would have the option of which year’s income data to use. We would like the Department to provide resources to current and future applicants via www.studentaid.gov regarding the upcoming use of prior-prior year.</p> <p>Student Aid Report</p> <p>7. In recent years, the aid community has been focused on improving the FAFSA itself. It is now time for us to improve the Student Aid Report (SAR), which has long been overlooked as a key communication tool in the financial aid process. We are sure any rudimentary consumer testing would show that the layout, readability, and general user-friendliness are all in need of a complete overhaul. We urge the Department to reconsider our previous requests to improve the SAR.</p>		<p>5. Refer to Comment #3.1 for resolution.</p> <p>6. The Department of Education has referred this suggestion to the appropriate business unit to review recommendations and conduct additional research.</p> <p>7. The Department of Education conducted extensive usability testing of the <i>Student Aid Report (SAR)</i> a few years ago, which resulted in a redesign of the form. We will assess this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities to determine the appropriate time to conduct new usability testing on the SAR.</p>

