

June 14, 2024

The Honorable James Kvaal
Under Secretary of Education
400 Maryland Ave. SW
Washington, DC 20202

Dear Under Secretary Kvaal:

On behalf of The Hope Center at Temple University, I write to provide recommendations for the **2025-26 Free Application for Federal Student Aid (FAFSA)**. The current financial aid cycle has been a tremendous challenge for students, financial aid administrators, college access professionals, and the U.S. Department of Education (“Department”). The Hope Center appreciates your efforts to correct many issues with the form and process and is pleased to see the gap in FAFSA completions beginning to close for some groups of students.

We acknowledge that today, the Department announced that *“the 2025-26 FAFSA will remain consistent with the 2024-25 form,”* but it *“will continue to make improvements to the form to enable a better user experience.”*¹ Therefore, we are sending these suggestions for improvements to you directly. We also know there is not much time to consider substantial changes from the current form while keeping the release of the coming year’s form on schedule and fully functional. Therefore, we stand ready to assist in any effort to streamline further and simplify the financial aid process for students in higher education, particularly those from low-income and systemically marginalized backgrounds. These comments address issues associated with inviting contributors, mixed-status families, federal benefit programs, students experiencing (or at risk of) homelessness, provisionally independent students, the Direct Unsubsidized Loan question, the inclusion of cash in assets, and other timely issues.

We also appreciate the Department is “working toward” the goal of launching the 2025-26 FAFSA on October 1, 2024, and plans to release a “Better FAFSA Better Future Roadmap” later this summer.² In addition to our content suggestions, we join the higher education community in calling for the Department to release a timeline for the key stages of the 2025-26 FAFSA cycle as soon as possible, similar to the helpful 2024-25 FAFSA Roadmap released in March 2023.³ We hope the Department will publicly announce a commitment to an October 1 launch date, including full functionality for all categories of applicants, as soon as possible.⁴

Transparency is paramount for students and families who need to plan for the many life decisions associated with attending college, especially those that implicate their basic needs like housing, food, transportation, health care, and child care. We thank you for your attention to these issues and your work to improve the FAFSA.

¹ U.S. Department of Education. (2024, June 14). [U.S. Department of Education Announces Jeremy Singer as FAFSA Executive Advisor in the Office of Federal Student Aid.](#)

² *Ibid.*

³ U.S. Department of Education, Office of Federal Student Aid. (2023, March 21). [2024-25 FAFSA Roadmap.](#)

⁴ Community request letter. (2024, June 10). [Letter regarding 2025-26 Launch Date.](#)

User Experience (UX) and Consumer Testing

The 2025-26 FAFSA and beyond would significantly benefit from the rigorous UX and consumer testing required under the *FAFSA Simplification Act*.⁵ The statute requires consumer testing with prospective first-generation college students, representatives of students (including low-income students, English learners, first-generation college students, adult students, veterans, servicemembers, and prospective students), students' families (including low-income families, families with English learners, families with first-generation college students, and families with prospective students), institutions of higher education, secondary school and postsecondary counselors, and nonprofit consumer groups. The Department has indicated that this consumer requirement is one of the "remaining provisions" of the law to be implemented and would benefit from additional funding from Congress to support compliance with the requirement.⁶

We look forward to hearing more about the listening sessions planned over the coming weeks⁷, but urge further UX testing. We also hope this consumer testing will proceed before the release of the 2025-26 FAFSA, that each of the statutorily required subgroups will have substantial representation in the consumer testing process, and that their feedback will be recorded and incorporated into the design of the form. We also urge the Department to consider making the results of the consumer testing publicly available to inform future public comment.

Verification and Conflicting Information

We appreciate the Department's relief of verification burdens in 2024-25 cycle, including steps to limit the selection of applicants to the most serious issues, such as suspected fraud or a severe breach of an institution's fiduciary duty. Given that the current cycle's difficulties are likely to reverberate for students and families for many years, we encourage the Department to extend this verification relief through the 2025-26 FAFSA cycle.

Additionally, students often undergo verification-like procedures at the institution level, which can impede their ability to access federal student aid. Colleges can ask students to provide additional documentation or justifications and, in some cases, to fill out additional forms for these processes, depending on their institution's processes and procedures. In some cases, this is due to financial aid administrators labeling FAFSA entries as "conflicting information." While we understand the need to protect federal student aid against fraudulent activity, we ask the Department to consider ways to inform financial aid offices about certain categories of students who should not need to complete additional paperwork. If the financial aid community supports a non-exhaustive list of what is, or isn't, considered to be conflicting information, we encourage the Department to produce such a list for public comment.

Inviting Contributors

We remain concerned about the design of the FAFSA contributor process, which asks a student applicant to provide their parent or spouse's first and last name exactly as it appears on their Social Security card, date of birth, email address, *and* Social Security Number (SSN). These requirements are onerous as many student applicants do not know, or cannot retrieve, this

⁵ Section 483(b)(2) of the *Higher Education Act* (20 U.S.C. 1090(b)(2)).

⁶ U.S. Department of Education. (2024, March). [FY 2025 Congressional Justification: Student Aid Administration](#).

⁷ See note 1. U.S. Department of Education. (2024, June 14).

information readily—and obtaining it may require that they disengage from completing the FAFSA soon after starting it, raising the risk they may not complete it at all. The contributor process should be designed for asynchronous input, where the student applicant is not filling out the FAFSA with their parent(s) or spouse concurrently, and it should minimize the required contact information. Additionally, the text accompanying this process should be updated with accessible, plain-language explanations of how the information will be used, including strong assurances of privacy, given that some parents or spouses will be reluctant to provide their personal information.

We ask the Department to change the current process to give applicants the option to invite contributors using only an email address or phone number, and then allow the receiving parent(s) or spouse to input their own date of birth and SSN with corresponding authentication. Student applicants should not be required to supply every identity field.

If it is not possible to overhaul the contributor process for the upcoming 2025-26 cycle due to system limitations, we ask the Department to, at a minimum, add significant new links and help text that advises student applicants on how to find their contributors' information if they do not have it and explaining why it is needed. Additionally, the help text that appears next to first and last name (if required) should a) strike the text that requires it to match *“exactly as it appears on the individual’s Social Security card”* given that not all contributors have SSNs, or b) move the check box about not having an SSN to the top of this screen and make the help text differ based on the applicant’s answer.

Mixed-Status Families

We appreciate the Department’s April 30 announcement of improvements to the FAFSA process for individuals without an SSN.⁸ However, this year’s process has been very difficult for mixed-status families, including students with undocumented parent(s) or spouses, and many challenges and barriers remain.⁹

We sincerely hope that the Internal Revenue Service (IRS) data retrieval issues are resolved for the 2025-26 FAFSA, and that students and contributors without SSNs will not universally be required to enter all tax and income data manually. We also hope that the identity verification process can be significantly streamlined. For example, we associate ourselves with the recent comments from The Education Trust requesting urgent changes to the FSA ID process, and better staffing for the FSA Information Center.¹⁰ Most importantly, the Department should create a portal within the FSA ID process where users can securely upload their identification documents instead of relying on unsecured emails and phone calls.

⁸ U.S. Department of Education, Office of Federal Student Aid. (2024, April 30). [\(GENERAL-24-52\) Update on Access to the 2024-25 FAFSA Form for Individuals Without a Social Security Number.](#)

⁹ Martinez-Alvarado, Sayda. (2024, June 12). [How Students From Mixed-Status Families Are Doubly Damaged by the FAFSA Mess.](#)

¹⁰ The Education Trust. (2024, June 11). [Comment on FSA ID Creation for Non-SSN FAFSA Filers, Docket No.: ED-2023-SCC-0216.](#)

But regardless of those changes, we also request that the Department ensure that the front and back-end process to set up an FSA ID, invite a contributor, or complete the corrections process without a SSN results in regular, informative, and multilingual status updates and follow-up instructions for all applicants. For example:

- The contributor pages should clearly indicate when and where individuals should or will need to provide an Individual Taxpayer Identification Number (ITIN) instead of vague references about it being encouraged or appearing on future pages or fields.
- The “help” article for contributors without an SSN should be readily linked to the contributor screens on the 2025-26 FAFSA, and that help article should be updated to include call center contact information.¹¹
- The Department’s call center staff should be provided accurate information for these applicants and be empowered to route or merge the call with a customer service agent who is a multilingual speaker (merging calls reduces the need for the applicant to repeat their story to a new agent).
- Each applicant who invites a contributor without an SSN should receive regular and targeted status updates (specific to their circumstances) via email about the processing of their contributor’s information and identity verification.
- If student applicants cannot be quickly provided with a Student Aid Index (SAI) due to issues related to identity verification, they should receive regular status updates and proactive information about when they should contact FSA or their schools for further assistance.

Finally, it is critical for the Department to repeat often throughout the FAFSA that filling out the FAFSA does not constitute any disclosure of immigration status and that information from the FAFSA will not be used for immigration enforcement purposes.

Corrections

We are concerned about the significant delays in the availability of applicant, individual, and batch corrections during the 2024-25 FAFSA cycle. In many cases, these delays have harmed students who are already systemically marginalized and historically underrepresented in higher education and left them in a state of limbo after completing their FAFSA. These include students who need to complete professional judgment or dependency override process, such as some unaccompanied homeless youth, youth who are self-supporting and at risk of homelessness, students who have been abandoned by or estranged from their parents, incarcerated students, refugees, and victims of human trafficking.

We encourage the Department to make all corrections available no later than two weeks after launching the 2025-26 FAFSA. We also ask the Department to publicize expected dates for when each type of correction will be available in any roadmap or timeline it publishes for the 2025-26 cycle to give applicants, financial aid staff, and college access professionals some clarity around this process.

¹¹ U.S. Department of Education, Office of Federal Student Aid. (2024). [How To Submit the 2024–25 FAFSA® Form if Your Contributor Doesn’t Have an SSN.](#)

Federal Benefits Received

Questions 18 and 36 on the FAFSA help to connect applicants with benefits that support their basic needs. A subset of the benefits also exempts applicants from asset reporting, simplifying the financial aid process, although most applicants remain in the dark about the purpose of these questions.

Intro text: We request explanatory text be added to the beginning of the question to inform applicants that their answers could make it easier for them to complete the FAFSA (by bypassing asset information for those who qualify) and could also help the applicant obtain additional sources of financial support. Some applicants may otherwise misunderstand the intent of this question, thinking that receiving other types of benefits would reduce their financial aid eligibility or otherwise harm them; unfortunately, similar fears linger among many immigrant families due to the prior Administration’s “public charge” regulation.¹² When applicants know they stand to benefit from this question, they will be more likely to answer it with greater accuracy. The Department should add explanatory or informational text just prior to the question, such as “*This information may shorten the time it takes to complete the FAFSA and help connect you with relevant resources.*” or “*Your answer may reduce the number of additional questions you are required to complete on this form and simplify your financial aid process.*”

Question text: The Department should revise the question text to align with the *FAFSA Simplification Act*, which requires the form to ask if the applicant (or their parent(s) or spouse) received the benefits “*within the last two years.*” The 2024-25 form instead asked whether the applicant received the benefit “*at any time during 2022 or 2023,*” which unnecessarily excludes all applicants who received a means-tested benefit at the same time they completed the FAFSA this year (e.g. in calendar year 2024) but did not receive it in 2022 or 2023. An applicant who signed up for Medicaid or a health insurance subsidy under the *Affordable Care Act* earlier this year during the open enrollment period would not be able to check “yes” to these questions. Additionally, more recent information about benefits uptake better reflects an applicant’s financial circumstances at the time of filing. Therefore, the text of this question on the 2025-26 FAFSA should read: “*At any time in the last two years, did the student or anyone in their family receive benefits from any of the following federal programs? Select all that apply.*” for the student, and similar text for the parent(s).

Under Section 483 (a)(2)(B)(ii)(XVII) of the *Higher Education Act* (HEA), the Secretary is authorized to add “*any other means-tested program determined by the Secretary to be appropriate*” to this list. Therefore, we continue to strongly urge the Department to add other federal benefits that could significantly improve the financial security and well-being of students and their families. We request the following list of benefits to be added to the list that can be checked by either the student or parent applicant(s), as applicable:

- Low Income Home Energy Assistance Program (LIHEAP)
- Unemployment Insurance (UI)

¹² Immigration Impact. (2023, August). [*The Ghost of Public Charge Keeps Scaring Immigrant Families Away From Public Benefits.*](#)

- Child Tax Credit (CTC)
- American Opportunity Tax Credit (AOTC) and/or Lifetime Learning Credit (LLC)

We also ask the Department to revise the field “*Refundable credit for coverage under a qualified health plan (QHP)*” to “health insurance subsidy under the Affordable Care Act.” The alternative language is more straightforward and will be better understood by applicants. Finally, we ask that “Earned Income Credit” be changed back to “Earned Income Tax Credit” to reflect common usage of this term, including how the IRS and poverty assistance organizations usually refer to the credit.

Finally, we ask the Department to add a “check box” to the 2025-26 FAFSA which proactively provides consent for applicants to share their FAFSA and tax data with local, state, and federal agencies that administer public and tax benefit programs.

Students Experiencing, or At-Risk of, Homelessness

We remain significantly concerned about several design aspects of question 6 and processes related to students who are unaccompanied and experiencing homelessness or self-supporting and at risk of homelessness (hereafter, UHY).

Question text: We reaffirm our request for the Department to expand the period referenced for when the student may have been experiencing homelessness, or at risk of homelessness, to better support these youth. The timeline should be prior-prior year (or the previous two years) as used elsewhere throughout the FAFSA, instead of “*on or after July 1, 2024*” – a narrow window not proscribed by the HEA. Shifting this timeline to “*during the previous two years*” (or, at a minimum, “*during 2023 or 2024*”) will help these at-risk youth be more likely to be identified and supported by their states and institutions. Recent data released by the National Center for Education Statistics found that 1.5 million students in higher education are experiencing homelessness.¹³ However, financial aid is serving only a tiny fraction of these students. Just under 80,000 students indicated they were an unaccompanied homeless youth in 2022-23, but more than half (55 percent, representing nearly 44,000 students) were unable to get a determination of homelessness from their financial aid office to be able to get the aid they needed.¹⁴ We request the Department’s support in addressing this severe disparity.

Question label or title: We request that the header or label of this question be modified to a more easily distinguishable term, such as “*Experience with Homelessness*” instead of “Student Other Circumstances.” There are many confusing, similar, and vague terms on the FAFSA and Federal Student Aid websites used to refer to students’ circumstances, including “personal,” “special,” “other,” and “unique.” It is exceedingly difficult for students to understand the differences in terminology and to advocate for themselves accordingly. Changing the header of this question will help students, financial aid administrators, and support organizations refer to the correct portions of the FAFSA. Neither statute nor regulation requires the labels of these

¹³ McKibben, B., Wu, J., and Abelson, S. (2023, August). [New Federal Data Confirm that College Students Face Significant—and Unacceptable—Basic Needs Insecurity](#). The Hope Center at Temple University.

¹⁴ National Center for Homeless Education. (2023). [FAFSA Data on Unaccompanied Homeless Youth: 2020-2021 through 2022-2023 Application Cycles](#).

questions to match the back-end processes and technical terminology used by financial aid administrators and the Department—they should be adjusted for simplicity.

Bumper screens: If an applicant has indicated yes to the homeless filtering question but selects “none of these apply” to the determination source, the 2024-25 FAFSA shows a bumper screen that indicates they are “provisionally independent.” This terminology is incorrect and confusing, as students who are unaccompanied homeless youth (or unaccompanied, at risk of homelessness, and self-supporting) are not the same as students who are provisionally independent because of their answer to question 7 (currently known as “unusual circumstances”). HEA Section 479D(a)(3) requires the homeless determination process to be distinct from provisional independence, and Sec. 483(2)(B)(v) requires the questions for those processes to be separate.

The flow should be modified to ensure that students who are UHY without a determination see one screen specific to their circumstances, and provisionally independent students see another that is specific to their circumstances. We remain aligned with advocates such as SchoolHouse Connection on these issues and are providing recommendations under separate cover.

Pre-selection for renewal applicants: Last year, the Department indicated that it planned to make changes for a coming cycle to the prepopulated answers for renewal applicants that previously indicated yes to the homeless filtering question but selected “none of these apply” to the determination source, in the 2024-25 FAFSA or prior years. We would like to confirm the implementation of this commitment, such that students who were later determined to be homeless by their financial aid administrator will have their determination of homelessness source pre-selected as “financial aid administrator” in a renewal application for 2025-26.

Eliminate the Question on Direct Unsubsidized Loans Only

The question related to requesting a Direct Unsubsidized Loan only (question 8) has created significant problems during the 2024-25 cycle and should be eliminated. As amended by the *FAFSA Simplification Act*, the HEA only authorizes a dependent student to pursue a Direct Unsubsidized Loan as an alternative to the professional judgment process or in the case of the failure to be declared provisionally independent (dependency override). The question is also not specifically authorized by the HEA. On April 9, the Department indicated that students had been selecting the Direct Unsubsidized Loan bypass at “historically high rates,” necessitating follow-up emails to confirm their status.¹⁵

Allowing students to bypass the steps that could unlock more favorable types of financial aid is contrary to the statutory intent. It is also harmful to applicants by creating further confusion for students who are eligible to claim “unusual circumstances” for not having contact with a parent. We hope this question will be deleted from the 2025-26 FAFSA in order to streamline and improve the financial aid process. Students who are later found to be ineligible for a dependency override should be processed for a Direct Unsubsidized Loan by their school—not through a complex process on the FAFSA itself.

¹⁵ U.S. Department of Education. (2024, April 9). [\(GENERAL-24-37\) Updates on Timelines for Corrections and Reprocessing and What it Means for Partners](#).

If the question cannot be deleted for 2025-26 due to technological limitations, the wording should be dramatically improved, and dependent students should receive ample warnings against selecting the question. For example, students should be told that the other options that allow them to obtain financial aid without parent information (professional judgment or dependency override) may make them eligible for assistance that does not need to be repaid, including grants and scholarships.

Permanent vs. Mailing Address

Last year, the Department indicated that it planned to make changes for a coming cycle for the help text near the term “permanent mailing address” under questions 2, 26, 31, and 43 to address situations in which an applicant is experiencing homelessness—for example, by referring to a mailing address. By definition, such students do not have permanent addresses. However, the online FSA ID creation process has not addressed this problem. We appreciate the mention of mailing addresses on the Department’s help page¹⁶, but most UHY students will not see this separate help article. Therefore, we ask that the fields related to address within the FSA ID contact fields include clear help or pop-up text, such as: *“If you do not have a permanent address, provide an address where you can receive mail.”*

Remove Cash from Assets

In both the student and parent assets fields (questions 22 and 40), applicants are asked to provide the *“current total of cash, savings, and checking accounts.”* However, the definition of assets under HEA Sec. 480(f)(1), as amended by the *FAFSA Simplification Act*, no longer includes cash. If applicants include their cash in this field, it will be counted against their financial aid contrary to the statute. Accordingly, we ask that the reference to cash be removed. Note that, on the online FAFSA, this will also require removing a reference to “cash” on screen 2 of 4, Contributors to the FAFSA Form, under “Information or Documents You May Need.”

Financial Circumstances (“Special” Circumstances)

We appreciate notes about changing financial circumstances (currently referred to as “special circumstances”) given that many applicants do experience changes to their financial well-being that are not captured by tax information. We suggest some modifications to ensure applicants can benefit from the professional judgment process. For example, the title of this question should be changed to avoid subjective terms like “special” (regarding the circumstances). Instead, this question and content should lead with accessible, plain language with a title such as *“What if my financial circumstances have recently changed?”*

We also suggest adding language that clearly indicates why an applicant would choose to notify their financial aid office in such circumstances, e.g. *“you may be eligible for additional aid.”* Otherwise, applicants may not understand that taking this extra step can benefit them.

Finally, we ask that the examples of expenses be simplified and include a reference to child care expenses, given that 1 in 5 of those enrolled in higher education are parenting students. The

¹⁶ U.S. Department of Education. (2024). [FAFSA® Tips for Unaccompanied Homeless Youth](#).

Government Accountability Office has previously found widespread under-utilization of the dependent care allowance.¹⁷ In sum, we recommend revising this header and text to:

What if my financial circumstances have recently changed?

If you or your family recently experienced significant changes to your financial situation (such as loss of employment or reduced income) or other circumstances that have limited your ability to afford higher education (such as high medical or child care expenses), you may be eligible for additional aid. Once you submit the FAFSA, contact the financial aid office at the college(s) you plan to attend and request that they review your circumstances.

Not in Contact with a Parent(s): Provisionally Independent Students

Explanatory text: Many student applicants have only one parent filling out the FAFSA, especially in the case of divorced, separated, or deceased parents. Therefore, the plural “parents” should be replaced with the singular parenthetical “parent(s)” throughout the FAFSA, and especially in question 7. This change also aligns with the *FAFSA Simplification Act*; in HEA Sec. 480(d)(9), the definition of provisional independence refers to when a student is “unable to contact a parent” to account for the cases in which a student may have only one parent with legal custody who would otherwise be a required contributor on the form.

Additionally, we ask that the Department remove the additional limitations that have been added for applicants who are incarcerated or have a parent(s) who is incarcerated. The HEA states that “student or parental incarceration” qualifies a student for provisional independence—without regard to whether contact in such an instance poses a risk to the student. When an applicant is incarcerated, or the applicant’s parent(s) are incarcerated, the parent has significant logistical barriers to creating an FSA ID and completing the required contributor functions of the FAFSA. For example, most prisons do not have internet access, and completing a paper FAFSA would require in-person visitation time.

However, a bullet in the explanatory text prevents a student from obtaining provisional independence when their parent(s) is incarcerated unless such contact would *also* pose a risk to that student. This limitation does not reflect the lived experiences of most students with a parent who is incarcerated, as contacting or visiting their incarcerated parent may still be possible (and preferable) even if the parent cannot readily supply their financial information, create an FSA ID, and complete other tasks. Therefore, immediately following the mention of incarceration, the Department should delete the phrase “and contact with the parents would pose a risk to the student” – as this caveat arbitrarily limits provisional independence and thereby aid. The bullet should read “*Are incarcerated, or their parent(s) are incarcerated;*” with no other limitation.

Ultimately, we believe that the provisionally independent pathway provides the opportunity for all incarcerated students to complete a normal FAFSA without having to supply parental information – therefore obviating the need for a separate incarcerated FAFSA form. But, if the

¹⁷ Government Accountability Office. (2019, August). [Higher Education: More Information Could Help Student Parents Access Additional Federal Student Aid.](#)

incarcerated form is maintained as a separate application for 2025-26, that separate application should then delete question 7 and all parent information entirely in that form, as all applicants using such a separate form will be incarcerated and therefore do not need to supply parent information. This question is not relevant to them and can induce further confusion.

Question label: Finally, as with the other sections, the title of this question should be changed to avoid the vague and subjective term “unusual.” It is easily confused with “personal,” “special,” “other,” and “unique.” Instead, this question and content should lead with accessible, plain-English terminology like “*Student Contact with Parent(s)*” or similar language.

In total, we ask this question to appear like the following:

Contact with Parent(s) or Other Circumstances

Do unusual circumstances prevent the student from contacting a parent, or would contacting such parent(s) pose a risk to the student? (Y/N)

This information will help us evaluate the student’s ability to pay for school. A student may answer “yes” to this question if they:

- *Left home due to an abusive or threatening environment;*
- *Are abandoned by, or estranged from, their parent(s);*
- *Have refugee or asylee status and are separated from their parent(s), or their parent(s) are displaced in a foreign country;*
- *Are a victim of human trafficking*
- *Are incarcerated, or their parent(s) are incarcerated; or*
- *Are otherwise unable to contact or locate their parent(s).*

If the student’s circumstances resulted in their not having a safe and stable place to live, they may be experiencing homelessness and should review their answer to question 6.

Students who are in contact with at least one parent to contribute to their FAFSA should answer “no” to this question.

Guidance: The Department should also specify in guidance that a student’s request for a determination of provisional independence will be honored unless (A) the student informs the institution that circumstances have changed or (B) the institution has specific conflicting information about the student’s independence and has informed the student of this information, just like the standard for students who must obtain a determination of independence if they are unaccompanied and experiencing homelessness or at risk of homelessness. Subjecting students to additional paperwork and documentation to re-verify their circumstances can negatively impact their chances of staying enrolled and graduating.

Flow: Last year, the Department indicated that it would consider for a “future enhancement” that a student applicant who previously selected “yes” to the provisionally independent question in a prior year’s application would have their answer auto-populated in any renewal FAFSA, to avoid

requiring students to answer repeated questions about these circumstances. We see to confirm this change will be included in 2025-26.

Student Demographic Information

We continue to recommend the Department move up questions related to sex/gender (question 11) and race/ethnicity (question 12) earlier in the form, alongside other demographic questions, where they are a better fit thematically. We also maintain that students should not be asked to submit information about their parents if they are independent or provisionally independent students. For example, the screen currently says “We’ll ask questions about you *and your parent(s)*” regardless of whether the student is applying with a parent. For example, a student in their mid-40s returning to graduate school would be asked about the demographic information of their parents. These students should receive a customized flow. If there cannot be a separate flow for independent students, we suggest that the reference to parents be deleted.

We also ask the Department to add a “Middle Eastern or North African” (MENA) category to the race and ethnicity options in question 12 as supported by the Office of Management and Budget’s (OMB) March 29, 2024 revisions to *Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity* (SPD 15).¹⁸ As reflected in SPD 15 summary of public input, commenters “*expressed that the current classification of MENA respondents as White does not reflect the reality of many who are MENA.*” The categories from the recent Census have not been updated since 1997, and approximately 3.7 million Americans trace their roots to an Arab country, according to the Arab American Institute.¹⁹ In complying with the new OMB directive, ED should remove the note that indicates applicants from Lebanese, Egyptian, and Iranian backgrounds are White.

Family size (questions 9 and 34)

Explanatory text: Determining who an applicant considers “family” or part of a household can be a fraught process. Federal Student Aid lists this question as one of the ten most common FAFSA mistakes and notes that “*many students incorrectly report this number, especially when the student doesn’t physically live with their parent.*”²⁰ It is easy for the FTI family size information to differ from the student’s current family size. Since family size can substantially impact a student’s eligibility for financial aid, it is critical that these instructions are clear, concise, and consistent. This question remains awkwardly worded and difficult for many applicants to answer. We request that the Department undertake specific consumer testing of this question with impacted communities.

It would be useful for the help text to refer students to examples where family size may have changed, such as divorce, marriage, death, births, or older siblings no longer living at home, and to provide links to help determine family size. The Department should consider adding help text

¹⁸ Federal Register. (2024, March 29). [Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.](#)

¹⁹ Arab American Institute. (2023). [About: Where do Arab Americans Live?](#)

²⁰ Federal Student Aid. [10 Common FAFSA Mistakes to Avoid.](#)

that is like instructions it has provided for income-driven repayment.²¹ Alternatively, the Department should copy over the clear text it has provided for students completing verification to ensure there are no differences between what the FAFSA instructs students to enter and what the verification process requires.²²

Additionally, we request the Department modify the question text to provide more guidance and flexibility to applicants who have a child before the beginning of the 2025-26 award year. The current text refers only to current circumstances, e.g. “*now* live with the student” or “living with the parent *now*.” However, if a student applying for aid in early 2024 has a child before commencing enrollment in 2025-26, their family size will change, and they could become eligible for additional financial aid. However, most applicants would not know about the potential increase to their eligibility unless they are notified.

Finally, we again request that the Department establish a procedure for reconciling any differences between the family size indicated by the student, and the parent(s), that can be resolved outside of any formal verification process, should this category be included in any future verification category. For example, the Department could explore email prompts that recommend a correction or review.

Language Accessibility

The *FAFSA Simplification Act* requires the Secretary to make the online FAFSA available in the 11 most common languages spoken by English learner students and their parents in the United States. However, this functionality was not included in 2024-25, and references made on a webinar suggested that translations would only be available via phone translation.²³ We hope that full electronic functionality for the 11 languages will be provided for 2025-26.

Further, we hope the Department can make it easy to toggle between language options screen-by-screen. Right now, users who want to switch between English and Spanish have to close out their current FAFSA screen to change their language setting under their account “Communication Preferences.” However, applicants filling out the FAFSA alongside a parent or spouse who does not speak the same language (or has varying levels of proficiency) only need to translate specific words or phrases and don’t need to set a new language preference for all forms and correspondence. Additionally, taking applicants away from their FAFSA page may interrupt their form completion. These challenges also exacerbate concerns for some mixed-status families with different first languages. The Department should add functionality that allows users to toggle between languages on each page of the FAFSA without separately applying a communications preference for all FSA correspondence.

Student Aid Report

We appreciate the enhancements to the Student Aid Report. We recommend adding or changing the following sections to the FAFSA Submission Summary and any confirmation pages:

²¹ U.S. Department of Education, Federal Student Aid. [How is ‘family size’ defined for income-driven repayment \(IDR\) plans?](#)

²² U.S. Department of Education, Federal Student Aid. (2023). [APPENDIX A: 2024-25 Suggested Verification Text.](#)

²³ NASFAA. (2024). [AskRegs: Will the FAFSA Be Provided In Languages Other Than English and Spanish?](#)

Special or unusual circumstances: We recommend this section be modified to include a clearer indication of the potential benefit to the student—additional eligibility for aid. Otherwise, applicants may not make the additional effort to report changes to their school that could help them succeed in higher education. Additionally, we recommend avoiding the subjective terms “special or unusual” in the body of the text. For example, the text could read:

Financial or Other Circumstances

If you or your family recently experienced significant changes to your financial situation (such as loss of employment or reduced income) or other circumstances that have limited your ability to afford higher education (such as high medical or child care expenses), you may be eligible for additional aid. Alternatively, you may not be required to provide parental information on your FAFSA if you are not in contact with a parent due to abuse, neglect, or abandonment, or are refugee or asylee. Contact the financial aid office at the college(s) you plan to attend and request that they review your circumstances.

Public, tax, and veterans’ benefits: We recommend creating a section that helps students obtain additional financial support through public benefits, tax benefits, and aid due to veteran or servicemember status. Creating a new section on these forms of support can also be used in part to fulfill the requirement in HEA Section 483(a)(3), clauses (iv) through (vi), for the Department to follow up with information on:

- Federal means-tested benefits that the applicant did not indicate they receive, but for which they may be eligible, and relevant links and information on how to apply for such benefits;
- Information on education tax benefits; and
- If the student is identified as a veteran, or as serving (on the date of the application) on active duty in the Armed Forces for other than training purposes, information on benefits administered by the Department of Veteran Affairs or Department of Defense, respectively.

While we appreciate the current mention of education tax benefits, we ask the Department to expand on this language to help further clarify the potential benefit to students, for example, by listing the name and potential maximum amount (e.g. “*American Opportunity Tax Credit worth up to \$2,500 per year*”).

Voter Registration

Current links to voter registration opportunities on Department websites, such as [vote.gov](https://www.vote.gov) should be expanded and made more easily noticeable. We ask that, after the confirmation page, the Department a proactive prompt that asks applicants if they would like to register to vote, or update their registration, and then redirects applicants to [vote.gov](https://www.vote.gov). Civic engagement benefits all communities, including financial aid applicants.

Cost of Attendance

Unfortunately, the Department's 2024-25 Federal Student Aid Handbook stipulates that nearly all forms of financial aid, including campus-based, state, and institutional aid (excluding only emergency aid), are limited to the total cost of attendance (COA).²⁴ Therefore, most students with a negative Student Aid Index (SAI) will not be eligible for additional aid beyond COA.

The shift to a negative SAI intended to reflect the substantial expenses that many students and families with low incomes face, including caregiving and work obligations, and to help students avoid basic needs insecurity by providing them with additional financial aid for these expenses.²⁵ However, the Department's interpretation of the need calculation contradicts the HEA, as modified by the *FAFSA Simplification Act*, which only limits Pell Grants, Direct Loans, and TEACH Grants to COA.²⁶

The HEA sections for campus-based, state, and institutional aid do not limit aid to COA. Students were intended to receive additional aid through these sources, but unfortunately, the Department's interpretation could significantly undermine the benefit of the negative SAI by denying needed funds to students with an SAI as low as -1,500. We call on the Department to change its policy interpretation and align with the statutory language as soon as possible. We plan to address this issue further in separate communications.

Conclusion

We thank the Department for its work to improve upon the challenges associated with the 2024-25 FAFSA cycle by further refining and streamlining the 2025-26 FAFSA. We look forward to working with you to implement these changes to make it easier for students to obtain the resources they need to pursue higher education.

Sincerely,



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²⁴ U.S. Department of Education, Office of Federal Student Aid. (2024). [2024-25 Federal Student Aid Handbook: Volume 3: Academic Calendars, Cost of Attendance, and Packaging.](#)

²⁵ Conroy, E., Goldrick-Rab, S., Kelchen, R., Welton, C., and Huelsman, M. (2021, April). [The Real Price of College: How Using the Negative Expected Family Contribution Can Better Support Students.](#)

²⁶ See, e.g., HEA Sec. 401(b)(B)(ii)