April 14, 2026

Manager of the Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave. SW, LBJ, Room 4C210
Washington, DC 20202-1200.

https://www.regulations.gov/document/ED-2026-SCC-0199-0001

Re: ED-2026-SCC-0199-0001

To Whom It May Concern:

On behalf of The Hope Center for Student Basic Needs, I write to comment on the **2027-2028 Free Application for Federal Student Aid (FAFSA).**

We appreciate the work of the staff of the U.S. Department of Education ("Department") to significantly improve the user experience and process of the Free Application for Federal Student Aid (FAFSA) in the last several years. We are especially pleased by the improvements to the contributor invitation process. However, we also request further enhancements to support students, families, and colleges—and to meet the intent of Congress when it passed the *FAFSA Simplification Act* and *FUTURE Act* more than four years ago.

These suggestions will increase the uptake and success of the federal financial aid programs. Thank you for the opportunity to provide the following comments on the 2027-2028 FAFSA and related issues.

Staffing Capacity

It is essential that the Department provide the necessary capacity to ensure the federal financial aid process is stable, reliable, and accessible for students. **The function of the FAFSA is only relevant if it is consistently available to students and families who use it** and if they can easily get help with common questions and barriers.

The Department's termination of hundreds of personnel from Federal Student Aid (FSA) since early 2025, including vendor performance and oversight staff, puts the entire operation of federal financial aid in serious jeopardy.

We urge the Department to swiftly rehire and backfill these FSA staff members and ensure it has robust subject-matter expertise to hold contractors accountable, as well as provide high levels of phone- and web-based customer support to applicants and schools.

<u>Draft Slides and Demonstration Site</u>
Without the availability of slides of the draft 2027-2028 FAFSA, or a demonstration site, it is difficult to construct appropriate public comments. The draft paper FAFSA does not reflect what the vast majority of students and families will experience and misses key nuances, such as the display and titling of screens. The Hope Center urges the Department to return to offering a fully functional FAFSA demonstration site and draft slides during the public comment period, similar to the recommendation of financial aid administrators and other college access professionals.
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<u>User Experience (UX) and Consumer Testing</u>
We appreciate that the Department has made significant strides in advancing FAFSA beta testing. However, we understand that such beta testing still largely occurs after the form's development has been finalized and is limited to addressing technical issues and bugs. Rigorous UX and consumer testing should be conducted *before* the form is finalized to help guide potential enhancements to the user experience.

The statute requires this sequence to allow for user testing that improves the flow, wording, and design of the form before it is finalized for public release.[1] We continue to urge the Department to commit to rigorous user testing that includes public summary reports from each of the statutorily required subgroups. User feedback should be recorded and incorporated into the design of the form, and the results of the consumer testing should be made available during the public comment period to shape relevant questions and feedback.

<u>Contributors without an SSN</u>
Students who are U.S. citizens but have parent(s) or spouses without Social Security Numbers (SSNs) face numerous difficulties in the financial aid process, which unnecessarily impede their ability to obtain the aid they are eligible for and to attend college. These students deserve the opportunity to attend higher education and enter the workforce just like any other student.

However, over the last three cycles, the FUTURE Act Direct Data Exchange (FA-DDX) has not functioned for contributors without an SSN, preventing them from importing their tax information. When these applicants are instead required to enter their data manually, the result is an increased workload for both applicants and colleges. Manually-entered data is substantially more prone to error.

We understand that FSA has indicated it will soon allow users with Individual Taxpayer Identification Numbers (ITINs) to transfer their tax information into the FAFSA via the FA-DDX, and we urge the Department to ensure this is fulfilled well before the beginning of the 2027-2028 cycle, while providing details and training to the financial aid community.

<u>Federal Benefits Received</u>
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, but most applicants remain in the dark about the purpose of these

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

questions. For the fifth year in a row, we again request that the Department make changes to the FAFSA questions and help text to enhance the clarity, usability, and impact of these questions.

Intro text: We request that explanatory text be added to the beginning of the question to inform applicants that their answers may help them complete the FAFSA more easily by bypassing asset information for those who qualify and could help the applicant obtain additional sources of financial support. For example, by including the following explanatory text:

> "***This information may shorten the time needed to complete the FAFSA and help connect the student with relevant resources.*** *Select all that apply."*

Without this explanatory text, some applicants will continue to misunderstand the intent of this question and could mistakenly think that receiving other types of federal benefits could reduce their financial aid eligibility or otherwise disadvantage them—when the opposite is true.

When applicants know they stand to benefit from taking the time to answer the question about federal benefits, they are much more likely to answer it and to do so with greater accuracy (such as selecting all of the programs they may be enrolled in). This help text will also support state and institutional efforts that use the benefits question to connect applicants with additional financial resources they have not yet tapped, meet their basic needs, and succeed in college.

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 draft form asks students whether they received a benefit "at any time during 2025 or 2026," which will unnecessarily exclude all applicants who receive a means-tested benefit in early 2027, when they may be filling out this version of the FAFSA.

For example, a FAFSA applicant who signs up for health coverage in 2027 during the open enrollment period would not then be able to check "yes" to this question because it is limited to 2025 and 2026. 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 2027-2028 FAFSA should read:

> "At any time **<u>in the last two years</u>**, did the student or anyone in their family receive benefits from any of the following federal programs?"

Also, note that we request a similar timeframe for the question related to unaccompanied homeless youth (e.g. two years). This change would make the FAFSA compliant with the HEA.

Additionally, we ask that "Earned Income Credit" be changed back to "Earned Income **<u>Tax</u>** Credit" to reflect common usage of this term, as used by the IRS and poverty assistance organizations. This box was previously listed as Earned Income Tax Credit for 2023-24 and prior years. We did not support the change to EIC, and, unfortunately, the inconsistent use of EITC and EIC across financial aid and public benefit processes will only confuse current or potential recipients. This change should be reversed.

Question options: 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 the list of federal benefits. Therefore, we continue to 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)
- Child Tax Credit (CTC)
- American Opportunity Tax Credit (AOTC) and/or Lifetime Learning Credit (LLC)

Checkbox for consent: Finally, we ask the Department to add a "checkbox" to the 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. Such a checkbox will provide a proactive way for all applicants to receive timely information and assistance to help them meet their basic needs. It will also conform with Department's guidance regarding outreach by states and institutions on means-tested benefits, which requires the student's consent to share FAFSA data for them to receive more targeted outreach.[2]

Students Experiencing, or At-Risk of, Homelessness

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

Data from the National Center for Education Statistics found that 1.5 million students in higher education are experiencing homelessness.[3] However, financial aid serves only a small fraction of these vulnerable students. More than 89,000 students indicated they were an unaccompanied homeless youth in 2023-25 (the most recent cycle available), but *nearly half* of those students (48 percent) were unable to get a determination of homelessness from their financial aid office.[4] Without a determination, the vast majority of these 43,000 unaccompanied homeless youth were likely unable to access financial aid and enroll in college.

We must do more to expand the number of students experiencing homelessness who can correctly identify themselves during the financial aid process and obtain the determination of homelessness that they need to actually receive the financial aid they're eligible for.

Question 6 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

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[2] U.S .Department of Education. (2024, July 29). *(GENERAL-24-93) Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies.*

[3] 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.

[4] National Center for Homeless Education. (2025). *FAFSA Data on Unaccompanied Homeless Youth: 2021-2022 through 2023-2024 Application Cycles.*

support these youth. The timeline for when a student experienced homelessness should be the previous two years, similar to timelines used elsewhere in the FAFSA, instead of *"on or after July 1, 2026."*

A narrow one-year window is not specified under federal law and restricts students' rights and benefits under the HEA. Changing the question wording to *"during the past two years"* will extend the timeline and help these at-risk youth be more likely to be identified and supported by their states and institutions. Therefore, question 6 should read:

> "At any time **during the past two years**, did the student face one of these situations:
>
> - They didn't live with a parent or guardian, and they were homeless.
> - They didn't live with a parent or guardian, were supporting themselves, and were at risk of homelessness.
> - They didn't face either of these situations.

Bumper screens: In previous versions of the FAFSA, if an applicant indicated yes to the homeless filtering question but selected "none of these apply" to the determination source, the web showed a confusing "bumper screen" that intended to serve dual purposes for two very different categories of students—homeless youth and provisionally independent students alike. Without a 2027-2028 preview FAFSA, we cannot determine if this flawed design remains unaddressed.

During a previous cycle, one section of the bumper screen indicated students who answered a previous question were "provisionally independent," while another section on the screen indicated students may be unaccompanied homeless youth. The bumper screen was displayed for both categories of applicants, even though these populations are distinct. This created unfortunate confusion. It also conflicts with the statute; 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 such processes to be separate.

The flow should 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 well aligned with advocates such as SchoolHouse Connection on these issues and requests.

Pre-selection for renewal applicants: In 2023, the Department indicated that it planned to pre-populate answers for certain renewal applicants who previously indicated yes to the homeless filtering question (question 6) in prior years but had selected "none of these apply" for the determination source. We hope to confirm the implementation of this commitment so that students who were later determined to be homeless by their financial aid administrator will have that determination source pre-selected as "financial aid administrator" in a renewal application for 2027-2028. The Department's prior commitment was not mentioned in the Summary of Enhancements.

Permanent Mailing Address

Students experiencing homelessness or housing instability frequently face challenges when asked to supply a "permanent mailing address." The notes section clarifies that applicants without a stable address may provide any location where they can receive mail, but we recommend that this clarifying language appear directly alongside the actual address question on both the online and paper versions of the FAFSA as help text, making it easier for students to respond accurately. This is a feasible addition given that the paper FAFSA already places supplementary address instructions for incarcerated applicants adjacent to the question.

Eliminate or Change the Question on Direct Unsubsidized Loans

Existence of question: The question related to requesting a Direct Unsubsidized Loan only (question 8) has created significant problems since it was unnecessarily added to the FAFSA. We appreciate that the Department has made modifications to the wording of this question and the help text, but the presence of the question remains confusing and, ultimately, counterproductive.

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 statute does not permit the inclusion of the Direct Unsubsidized Loan question within the parameters of Section 483 of the HEA, which limited (and reduced) the questions that could be included on the FAFSA. As such, this question is in violation of the HEA.

Allowing students to bypass the steps that could unlock more favorable forms of financial aid (including state and institutional aid) is contrary to the statutory intent to expand access to and uptake of grants and scholarships. It also creates confusion among students who are eligible to claim "unusual circumstances" due to a lack of contact with a parent. This question should be deleted entirely from the FAFSA to streamline and improve the financial aid process.

Students who are later found to be ineligible for a dependency override can then be processed for a Direct Unsubsidized Loan by their college—not through a complex process that begins on the FAFSA and before a student can receive guidance from their financial aid office.

Question title: The question title is confusing. It is unclear what the relationship is between the title ("Direct Unsubsidized Loan Only") and the body of the question text, particularly if the applicant has never encountered these terms before. If the question is not deleted, we recommend changing the title to "If Parents Refuse to Provide Information" at a minimum.

Plural language: This question uses the plural "parents" when not all students have multiple parents. It should be *parent(s)* – with a parenthetical. A student with only one parent may be confused by this question if they do not have two parents able to provide information. If this question is not deleted, it should be changed to:

"Are the student's parents (or their parent who would contribute to the FAFSA) refusing to provide their information on this FAFSA form?"

Alternative to Direct Unsubsidized Loan Question: Instead of asking applicants a negative question—if their parents are refusing to provide information—the FAFSA should instead present students with a set of naturally flowing questions related to their ability to provide parent information. For example, by asking students *"Are you able to provide parent information?"* then providing Yes/No fields next to each of the conditions that could make the student eligible for provisional independence, and ending with a *"None of these apply"* option.

If the student selects "none of these apply" to the circumstances, they should then be presented with the opportunity to change their answer. This alternative flow would conform with the HEA provisions regarding questions for provisional independence and unaccompanied homeless youth. It could look like the following:

Direct Unsubsidized Loan Only if Parents Refuse to Provide Information
As a dependent student, you must provide parent information on your FAFSA form to determine how much federal student aid you can receive. If your parent(s) refuse to provide their information, you will not be eligible for Federal Pell Grants and most other types of student aid unless you meet limited exceptions. Therefore, providing parent information is recommended.

Do your parent(s) agree to provide their information on the FAFSA?

- *Yes, my parent(s) will provide their information so that I can be considered for Federal Pell Grant eligibility and most federal student aid.* ***(Recommended)***

- *No, my parent(s) refuse to provide their information. As a result, I will not be considered for Federal Pell Grant eligibility and most federal student aid. I will only be eligible for a Direct Unsubsidized Loan which must be repaid.*

Pop-up for alternative: Depending on the answers that students provide to this question, they should be told specific and relevant information. If students answer that their parents are refusing to provide information, they should at least 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—so that these students do not give up on the financial aid process altogether, and have a chance to first interact with their financial aid office. It is important that students in difficult family situations are not discouraged from enrolling in college.

Financial Circumstances ("Special" Circumstances)
Many applicants experience changes to their financial well-being that are not reflected in their tax information. We suggest modifying the note on page 1 of the FAFSA to ensure applicants can benefit from the professional judgment process. The title of this question should be changed to avoid subjective terms like "special." It should lead with accessible, plain language and clearly

indicate 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.

The examples should be simplified and include a reference to childcare expenses, given that one in five students enrolled in higher education are parenting students. 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), <u>you may be eligible for additional aid</u>. 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.*

<u>Assets</u>

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 <u>cash</u>, 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" in the list of assets. 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."

Fishing: Questions 22 and 40 are not written in accordance with recent changes to the Higher Education Act. Commercial fishing businesses must be family-owned and controlled to be exempt, and this should be stated. Otherwise, all commercial fishing businesses—some with billions of dollars in annual revenue—will be exempt from asset reporting.

Whose assets: While the title of the student and contributor asset questions are specific, it is unclear in which fields a student should report information that their contributor may report. The explanatory or help text before each question should specify "student's" – e.g. *Enter the student's total amount in savings and checking accounts. Do not include amounts being reported separately by your parent or spouse, and do not include student aid."*

Flow: We are concerned that many applicants may still not benefit from the statutory intent to reduce asset reporting. It appears that nearly all applicants still see the asset questions even if they are non-filers, have received applicable federal means-tested benefits, or have a negative SAI. Many applicants in these categories may not be aware that they aren't required to answer the asset questions, which could slow them down or deter them from completing the FAFSA. This error appears to be due to the timing of verifying that students and contributors alike can qualify for the exemption to asset reporting.

However, the current flow appears to limit the potential of FAFSA simplification to reduce self-inputted questions. We request that the Department identify any categories of individuals who, based on the status of all contributors in their application, could automatically skip asset questions if all such applicable individuals in the process qualify for the asset reporting exemption. For example, if a dependent student's parent(s) already meet the requirements to be exempt from asset reporting, and then the student subsequently begins the form and is also exempt from asset reporting, the form should skip the asset questions—and vice versa.

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, 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, regardless of 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, they will have 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. 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 applicant" FAFSA form. Therefore, we recommend eliminating a separate incarcerated student form and a separate paper FAFSA. But, if the incarcerated form is maintained as a separate application for 2027-2028, that separate application should omit question 7 and all parent information entirely, 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. Finally, it is essential to reframe the question in a personal “you” rather than “the student” so that the applicant feels seen and heard.

Question label: Finally, as with the other sections, the title and body 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 *“Contact with Parent(s)*” or similar language. In total, we ask this question to appear like the following:

> ***Contact with Parent(s)***
> *This information will help us evaluate your ability to pay for school.*
>
> *Do circumstances prevent you from contacting a parent who could contribute to filling out the FAFSA, or would contacting such parent(s) pose a risk to you? You may answer “yes” to this question if you:*
>
> - *Left home due to an abusive or threatening environment;*
> - *Have been abandoned by, or estranged from, your parent(s);*
> - *Are a refugee or asylee and are separated from your parent(s), or your parent(s) are displaced in a foreign country;*
> - *Are a victim of human trafficking;*
> - *Are incarcerated or your parent(s) are incarcerated; or*
> - *You are otherwise unable to contact or locate your parent(s).*
>
> ◯ Yes   ◯ No
>
> *Note: If your circumstances have resulted in you not having a safe and stable place to live, you may be experiencing homelessness and should review your answer to the previous question.*

Flow: In 2023, 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 are still waiting to understand if this has happened and ask the Department to confirm that this change will be implemented for 2027-2028, and that students will be given information that explains why the answer to their question has been pre-selected.

<u>Student Demographic Information</u>
Gender (Question 11): We disagree with the Department’s decision to change the gender question to remove the “Nonbinary” and “Prefer not to answer” options for students. There is no

scientific basis for relying on a gender binary, and the Department's change is harmful to efforts to improve student support and success, including for LGBTQ students.

Additionally, by eliminating the "prefer not to answer" option, the Department has effectively made this question mandatory even though it is not required for financial aid awards. This was not the intent of the *FAFSA Simplification Act.* And there is no legal barrier to the Department including a "prefer not to answer" option, as was the case prior to February 2025. The Department should restore both the "Nonbinary" and "Prefer not to answer" options. Or, at a minimum, the Department should make this question optional.

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."*[5] 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.

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. There should also be help text similar to the instructions it provides for income-driven repayment, or a link to help students determine their family size.[6] 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.[7]

Additionally, we request that the Department modify the question text to provide more guidance and flexibility to applicants who have a child before the beginning of the award year. The current draft 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 2027 has a child before commencing enrollment, 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.

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[5] Federal Student Aid. *10 Common FAFSA Mistakes to Avoid.*
[6] U.S. Department of Education, Federal Student Aid. *How is 'family size' defined for income-driven repayment (IDR) plans?*
[7] U.S. Department of Education, Federal Student Aid. (2023). *APPENDIX A: 2024-25 Suggested Verification Text.*

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 2025-26 and remains unavailable.[8] The Department is not in compliance with the HEA requirement.

The Department should 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.

Avoid Vague Terms Like Personal, Special, Unique, and Unusual Circumstances
The FAFSA currently uses confusing, similar, subjective, and vague terms to refer to student and family circumstances or situations, including "personal," "special, "other," and "unique." It is exceedingly difficult for students and families to understand the differences in this terminology and to be able to advocate for themselves accordingly. We hope the Department will revisit its categorization of all of these terms, and search for simplifying phrasing – for example, by referring to what is now known as "unusual circumstances" as "provisional independence" – as it is used in the HEA.

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

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:

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

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), <u>you may be eligible for additional aid</u>. 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"*).

<u>**Confirmation Page**</u>

Process: We suggest adding new information to be displayed to applicants that provides an overview of the next steps in the financial aid process for students, including a note that it may take some time for the student to receive a financial aid package from their school, and where they can find additional supports to help them meet college costs and their basic needs.

<u>**Verification Selection**</u>

The Department has recently been expanding verification for Title IV aid. We ask the Department to ensure that verification procedures do not create additional burdens or barriers for students experiencing homelessness or students who have been in foster care. Threse students are disproportionately likely to have changing addresses, and the verification procedures should not select students on this basis alone.

Student Aid Index Proration
The statute does not prevent the Department from reverting to its previous treatment of students enrolled for periods other than nine months, which required institutions of higher education to use a pro-rated Student Aid Index (SAI) based on the number of months the student is enrolled within the award year, just as the need calculation does for cost of attendance.

It is fundamentally unfair to use an SAI that is not pro-rated for students less than a full year, as many of these students will lose access to financial aid to meet their basic needs. The HEA is only silent on pro-ration and does not prevent the Department from returning to its previous practice in this area. If necessary, the Department could issue regulations to clarify this issue.

Conclusion
We appreciate the opportunity to comment on the 2027-2028 FAFSA.

If you have any questions regarding these comments, please contact me at bryce.mckibben@temple.edu.

Sincerely,

Bryce McKibben

Bryce McKibben
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