



September 13th, 2024

Ms. Melanie Storey
Director, Policy Implementation and Oversight
U.S. Department of Education
Federal Student Aid

Re: Docket ID ED-2024-FSA-0099

Dear Ms. Storey:

On behalf of The Hope Center for Student Basic Needs at Temple University, I write to respond to the **2025-26 Free Application for Federal Student Aid (FAFSA) Request for Information (RFI)**. We appreciate this opportunity to provide suggestions and recommendations to improve access to federal financial aid. While we all know the 2024-25 financial aid cycle has been deeply challenging for students, financial aid administrators, college access professionals, and the U.S. Department of Education (“Department”) alike, we are hopeful for a smoother process in the coming year.

We support your decision to delay the full launch of the 2025-26 FAFSA until December 1st to provide more beta testing time and resolve remaining technical challenges with the redesigned FAFSA. We all agree that an October 1st launch date is ideal, but rebuilding trust with the end users of the FAFSA—students and families—is paramount. A stable and functional form will also make things easier for the thousands of dedicated college access professionals guiding applicants through the financial aid process.

While the Department has announced that the 2025-26 FAFSA will “remain consistent” with the prior year’s form¹, we still ask you to consider urgent adjustments that would streamline applicants’ ability to fill out the FAFSA and especially changes to question text, help prompts, help articles that would not change the file layout or otherwise derail the technological functions of the form for all students.

Students and families need as much time as possible 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. Further streamlining the financial aid process helps support students’ ability to secure these basic needs. We sincerely thank you for your attention to these issues and your work to improve the FAFSA.

¹ U.S. Department of Education, Office of Federal Student Aid. (2024, June 17). [*GENERAL-24-72 Details Related to the 2025-26 FAFSA Form Launch, Opportunities for Engagement, and Additional Activities for the 2024-25 Cycle.*](#)

Creating or accessing an FSA ID

Permanent address: When students, spouses, or parents create an FSA ID, under the “Contact Information” page, they should be given the option to provide an address where they can reliably receive mail instead of only a “permanent address.” Applicants and contributors experiencing homelessness do not have a permanent address to call home. Some students who primarily reside in on-campus housing may not have another address.

Last year, the Department indicated that it planned to make changes to the help text near the term “permanent mailing address” under questions 2, 26, 31, and 43 of the paper FAFSA by referring to a mailing address. However, the online FSA ID creation process still uses the phrase “permanent address.” Applicants and contributors without a permanent address may incorrectly perceive that they are ineligible to receive student aid, be confused about which address to list, or could even end up providing a “permanent” address of a friend or family member where they do not live and cannot receive mail.

At a minimum, we ask that the fields related to address within the FSA ID process 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.”*

Non-SSN language: During the FSA ID creation process, applicants are given the option to select that they do not have a Social Security Number (SSN) but are asked if they meet one of two conditions: whether they are a) a citizen of the Freely Associated States who needs to complete the FAFSA or b) a parent or spouse of a student who is applying for aid. We suggest changing the order of these two options since the population meeting the second category is much larger. We also suggest defining the Freely Associated States on the page (e.g. the Federated States of Micronesia (FSM), the Republic of the Marshall Islands (RMI), and the Republic of Palau).

Additionally, we strongly suggest adding a note that parents and spouses without SSNs can safely create an FSA ID and complete the FAFSA and that their data privacy will be protected, so that they are not left in the dark about their ability to help their child or spouse.

Additionally, many student applicants without an SSN may be eligible for state, local, or institutional aid (e.g. state grant aid for undocumented students) even if the FAFSA is not their pathway to gain access to federal aid. This should be stated clearly, as it is important to make sure all students know there may be resources available to them. For example, the FSA ID creation page could say something such as *“If you are a student without an SSN, you may be eligible for financial aid from your state or college by filling out a different application than the FAFSA. Check with your state or financial aid office for more information.”*

Two-step verification: Many students and their families use multiple phone numbers or email addresses, and having to remember these places a burden on the applicant, which can disrupt their ability to complete the application. We urge the Department to provide a phone-call-based authentication method that can be sent to a phone number of applicants’ choosing without having to call the FSAIC or submit photo identification, as is currently required.

Confirming information: When users simply confirm their email and phone number but make no changes, they recurrently receive an email with the subject line “*Your FSA ID Information Was Changed*” which is inaccurate and causes unnecessary alarm. Users should not receive any email if they simply confirm their information without making changes.

Mixed-Status Families

We appreciate the Department’s continued attention to the issues facing applicants without an SSN, including students with undocumented parent(s) or spouses, given the many challenges and barriers they have faced in the 2024-25 cycle.² In particular, we strongly support the decision to continue allowing applicants to submit a FAFSA while their identity validation process is ongoing and to pause any restricted status for students or contributors without an SSN for the duration of the 2025-26 cycle.

We sincerely hope that the Internal Revenue Service (IRS) data retrieval issues are resolved before the 2026-27 cycle and that students and contributors without SSNs will soon be able to use the FUTURE Act Direct Data Exchange (FA-DDX) to import their tax data. 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.³ 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.

Even though the Department has paused restrictions in completing the FAFSA during contributors’ ongoing identity validation, it should continue to set up applicants for success in future award years—and for potential student loan repayment—by working to provide additional pathways to completing identity validation during the 2025-26 award year. All contributors without an SSN deserve an option to complete identity validation as soon as possible.

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 an 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 linked to the contributor screens on the 2025-26 FAFSA, and that help article should be updated to include call center contact information.⁴

² Martinez-Alvarado, Sayda. (2024, June 12). [*How Students From Mixed-Status Families Are Doubly Damaged by the FAFSA Mess.*](#)

³ The Education Trust. (2024, June 11). [*Comment on FSA ID Creation for Non-SSN FAFSA Filers, Docket No.: ED-2023-SCC-0216.*](#)

⁴ 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.*](#)

- 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 and FSA ID process that filling out the form does not constitute any disclosure of immigration status and that information from the FAFSA will not be used for immigration enforcement purposes.

User Experience (UX) and Consumer Testing

We appreciate that the Department has announced beta testing to confirm the functionality of the form and processing of Institutional Student Information Records (ISIRs) prior to the full launch on December 1st. However, this beta testing will occur after the form has already been designed. The 2025-26 FAFSA and beyond would benefit from rigorous UX and consumer testing required under the *FAFSA Simplification Act*.⁵

The statute requires consumer testing to inform changes to the FAFSA that improve the flow, wording, and design of the form before it is finalized for public release. Last spring, the Department indicated that consumer testing is one of the “remaining provisions” of the *FAFSA Simplification Act* to be implemented and would benefit from additional funding from Congress to support compliance with the requirement.⁶

We hope the Department will commit to rigorous user testing well in advance of the 2026-27 FAFSA cycle that includes each of the statutorily required subgroups. Their feedback should be recorded and incorporated into the design of the form, and we request that the results of the consumer testing be made publicly available to inform future public comment. We suggest that the Department launch a 2026-27 consumer testing effort no later than the end of February 2025.

Inviting Contributors

We remain concerned about the design of the FAFSA contributor process, which asks student applicants to provide their parent or spouse’s first and last name exactly as it appears on their Social Security card, their date of birth, their email address, *and* their Social Security Number (SSN). Any small error in any of these would result in a non-match.

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.*](#)

Many student applicants do not know, or cannot retrieve, this information readily or exactly as it appears on their parent’s Social Security card—for example, when parent(s) or a spouse use a name with their child or spouse that is different than their legal name. In these cases, applicants stop and disengage from completing the FAFSA soon after starting it, which increases the risk of non-completion.

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, with minimal 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.

Applicants should be given 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—particularly if such a user has already created an FSA ID. Student applicants should not be required to supply every identity field.

Additionally, applicants who can complete the contributor identification process synchronously with a parent or spouse should be able to link their FSA ID with a “live” feature that confirms receipt or input of the invitation without waiting to act on an invite later.

If it is not possible to overhaul the contributor process during the 2025-26 cycle, 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 customize the resulting help text based on the applicant’s answer to the SSN field (again, with text that does not refer to the Social Security card when an applicant has already stated they do not have an SSN).

We also ask the Department to add text near the question to clarify when a student applicant should invite one or both of their parents if they have more than one parent. The current language is confusing and, at times, contradictory. These instructions should refer to other help articles that help a student identify which parent to include as a contributor.

State of Legal Residence

Questions 14 and 33 of the student and contributor portions of the FAFSA, respectively, as for a state of “legal residence.” This phrasing causes unnecessary confusion for undocumented contributors, in particular, who often believe that they are unable to answer the question due to their immigration status. Instead, we suggest removing the word “legal” from the question title and text. Further, the Department should provide help text clarifying that applicants should indicate how long they have resided in the state in which they live, and how that may be different from the state in which they attend college. This help text should specifically articulate that the question refers to an applicant’s home and is not affected by immigration status.

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, but most applicants remain in the dark about the purpose of these questions. We ask the Department to make changes to the FAFSA questions and help text to improve the clarity, usability, and impact 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.⁷

When applicants know they stand to benefit from taking the time to answer this question, they are much more likely to answer it—and to complete it with greater accuracy by selecting all of the programs they may be enrolled in. 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.”* This help text will 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 current prototype asks students whether they received a benefit *“at any time during 2023 or 2024,”* which will unnecessarily exclude all applicants who receive a means-tested benefit in early 2025, when they may be filling out the FAFSA.

For example, a FAFSA applicant who signs up for Medicaid or a health insurance subsidy under the *Affordable Care Act* earlier in 2025 during the coming open enrollment period would not then 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). Also, note that we request a similar timeframe for the question related to unaccompanied homeless youth (e.g. two years).

⁷ Immigration Impact. (2023, August). [*The Ghost of Public Charge Keeps Scaring Immigrant Families Away From Public Benefits.*](#)

We also ask the Department to revise the text of the field “*Refundable credit for coverage under a qualified health plan (QHP)*” to a more accurate label such as “*health insurance subsidy under the Affordable Care Act or state marketplace.*” This alternative language is more straightforward in referring to the same benefit. Applicants will better understand it, as most recipients, social service providers, health insurance navigators, and medical professionals do not refer to “refundable credits” or “qualified health plans” when discussing credits under the state or federal health insurance marketplaces.

Additionally, 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. We did not support the prior year’s change to EIC, and, unfortunately, the varying uses of EITC and EIC throughout the financial aid process will only confuse recipients.

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)

While we understand that the Department may not be able to add these fields for the 2025-26 FAFSA due to resulting changes in the file layout, it is important to add them to the queue for the 2026-27 FAFSA.

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 amplify the Department’s recent guidance regarding outreach by states and institutions on means-tested benefits.⁸

We understand these additions to the benefits questions are not likely possible for the 2025-26 FAFSA due to the resulting modification of the file layout, but we hope the Department will strongly consider it for the next cycle.

⁸ U.S .Department of Education. (2024, July 29). [*GENERAL-24-93* Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies.](#)

Students Experiencing, or At-Risk of, Homelessness

We appreciate the Department’s recent attention to issues related to the questions for students who are unaccompanied and experiencing homelessness or self-supporting and at risk of homelessness (hereafter, UHY). However, despite progress and assurances, we remain concerned about several design aspects of question 6 and request further improvements.

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 in the FAFSA, instead of “*on or after July 1st, 2024*” – a narrow window not proscribed by the HEA.

Shifting this timeline to “*during the past two years*” 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.⁹ 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.¹⁰ We request the Department’s support in addressing this severe disparity. This change will benefit students and does not require any modification to the file layout.

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.

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 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 referred to 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 such processes to be separate.

⁹ 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.

¹⁰ National Center for Homeless Education. (2023). [*FAFSA Data on Unaccompanied Homeless Youth: 2020-2021 through 2022-2023 Application Cycles*](#).

We appreciate that, in conversations with the Department, there are plans to fix the incorrect language on the bumper screen. However, to fully fix the issue, 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 well aligned with advocates such as SchoolHouse Connection on these issues and requests.

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 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 2025-26.

Follow-up emails: Given that UHY students who do not already have a determination of homelessness will need to contact their financial aid office to complete processing, we ask the Department to send targeted and supportive emails to these applicants laying out their next steps. While well-intentioned, similar notifications sent in 2024-25 have contained misleading information or alarming language that appeared to question whether students were experiencing homelessness. Therefore, we also ask the Department to engage in consumer testing and stakeholder consultation to design these emails.

Timeline for document processing: Under the HEA, institutions are required to review all requests for a determination of independence from UHY students no later than 60 days after the student enrolls or within 60 days of the student making a request for a determination of independence. This student protection was adopted due to numerous delays with students receiving timely determinations from their financial aid offices and sometimes not hearing back from their requests at all.

However, in a recent announcement, the Department appeared to relax this firm deadline to “as quickly as appropriate” for the institution “due to current system limitations with submitting institution-initiated corrections.”¹¹ While we understand the widespread technological challenges with the 2024-25 cycle, including the unavailability of batch corrections, we are concerned that this sub-regulatory interpretation conflicts with the statute, and ask the Department to reaffirm the 60-day limit in communication to financial aid professionals as soon as possible, for both the 2024-25 and 2025-26 cycles.

Streamlining UHY determinations: Many under-resourced or under-trained financial aid offices ask students experiencing homelessness for inappropriate information that can retraumatize students. Some privately created templates are available, but many colleges are

¹¹ U.S. Department of Education, Office of Federal Student Aid. (2024, May 23). [*GENERAL-24-63* 2024-25 Processing Timeframes Associated with Reporting V4/V5 Outcomes and Unusual Circumstances and Homeless Youth Determinations, and Update on ISIR Values for Ward of Court and Foster Youth Status.](#)

having to duplicate similar efforts. We ask the Department to create a sample and voluntary UHY determination form for colleges that complies with the law, includes legal definitions for student homelessness, and minimizes the burden on student applicants to provide supporting documentation or evidence.

Change or Eliminate 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 in 2024-25 cycle—the first cycle in which it was added to the FAFSA. We appreciate that the Department has made modifications to the wording of this question and added a pop-up, and that applicants’ affirmative answers to this question have come down significantly, 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 also 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.

Allowing students to bypass the steps that could unlock more favorable types of financial aid (including state and institutional aid) is contrary to the statutory intent of expanding access to and uptake of grants and scholarships. It also creates confusion among students who are eligible to claim “unusual circumstances” for not having contact with a parent. We hope this question will ultimately be deleted 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 school—not through a complex process that begins on the FAFSA and before a student can receive guidance from their financial aid office.

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, ending with “*None of these apply.*” If the student selects “none of these apply” to the circumstances, they should then be presented the opportunity to change their answer, or information that their school would later use to make a determination of their eligibility for a Direct Unsubsidized Loan.

Given that these substantial revisions to the 2025-26 FAFSA are likely not possible given the resulting changes to the file layout, we ask for consideration of the following changes.

Banner text: Under the 2024-25 FAFSA and the 2025-26 FAFSA prototype, a “dependent student” banner appears above this question. Within this banner or image there is a message that says “*you must provide parent information on our FAFSA form*” but the question itself provides students the option to decline providing parent information—setting up a confusing contradiction.

The banner should be customized for this question and eliminate references to requiring parent information, replacing it instead with language such as “*if your parents refuse to provide their information, you will not be eligible for Federal Pell Grants and most other types of student aid. See below.*”

Question title: It is unclear what the relationship between the title of the question “Direct Unsubsidized Loan Only” and the body of the question text is – particularly if the applicant has never encountered that term before. We recommend adding words that link the topic to question (e.g. If Parents Refuse to Provide Information).

Question text: We ask the Department to consider revising the language to the following, with the addition of which answer is “recommended”:

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: 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.

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.

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 Government Accountability Office has previously found widespread under-utilization of the dependent care allowance.¹² 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.

Assets

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.”

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 not benefit from the statutory intent to exempt additional individuals from asset reporting. It appears that most applicants still see the

¹² Government Accountability Office. (2019, August). [*Higher Education: More Information Could Help Student Parents Access Additional Federal Student Aid.*](#)

asset questions even if they are non-filers, have received applicable federal means-tested benefits, or have a negative SAI. Many of the applicants in these categories won't know they aren't required to answer the asset questions and may be slowed down or deterred from completing the FAFSA.

While we recognize there are issues associated with the timing of the requirement for inviting contributors, the current flow appears to limit the potential benefit of FAFSA simplification to reduce self-inputted questions. We ask the Department to identify categories of individuals who, based on the status of all contributors in their application, could automatically skip asset questions if all such applicable individuals 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, 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, 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 separate paper

FAFSA. But, if the incarcerated form is maintained as a separate application for 2025-26, 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 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).*

<input type="radio"/> Yes	<input type="radio"/> No
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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.

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.

Help articles: The Department’s help articles for provisionally independent students remain misaligned with the question text.¹³ For example, they mention students who have not been adopted, which is an incorrect limitation. These articles should be updated.

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 seek to confirm this enhancement will be included in 2025-26, and that students will be given information that explains why the answer to their question has been pre-selected.

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 29th, 2024 revisions to *Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity* (SPD 15).¹⁴ 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.¹⁵ 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.*”¹⁶ 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,

¹³ U.S. Department of Education. (2024). [Reporting Parent Information](#).

¹⁴ 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](#).

¹⁵ Arab American Institute. (2023). [About: Where do Arab Americans Live?](#)

¹⁶ Federal Student Aid. [10 Common FAFSA Mistakes to Avoid](#).

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 that is like instructions it has provided for income-driven repayment.¹⁷ 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.¹⁸

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 2025 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.

We also suggest adding a third response option, other than “yes” or “no” – an “I don’t know” option, which also results in the adjustable display option that currently appears with “yes.”

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.¹⁹ While we know it is not feasible to provide full electronic functionality for the 11 languages for 2025-26, we sincerely hope it will be provided for 2026-27.

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

¹⁷ U.S. Department of Education, Federal Student Aid. [How is ‘family size’ defined for income-driven repayment \(IDR\) plans?](#)

¹⁸ U.S. Department of Education, Federal Student Aid. (2023). [APPENDIX A: 2024-25 Suggested Verification Text.](#)

¹⁹ NASFAA. (2024). [AskRegs: Will the FAFSA Be Provided In Languages Other Than English and Spanish?](#)

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:

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*”).

Confirmation Page

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.

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 noticeable. After the confirmation page, we ask that the Department include a proactive prompt that asks applicants if they would like to register to vote, or update their registration and then automatically redirects applicants to [vote.gov](https://www.vote.gov). Civic engagement benefits all communities, including financial aid applicants.

Follow-up email campaigns

Next steps: As discussed in other sections above, we request the Department send specific follow-up emails to discrete categories of students who need to complete additional steps in order to access federal aid. For example, we recommend that individuals needing identity validation, unaccompanied homeless youth, and provisionally independent students should receive regular notifications by email and text message, as applicable, indicating the steps they should take after submitting the FAFSA if their answers on the form require additional action. If a financial aid office is required to take action, these applicants should receive communications that they should have heard from their financial aid office, and if they have not, they should reach out to the financial aid office for an update.

Additionally, all applicants without unique circumstances should receive general “roadmap” type language after submitting the FAFSA that lays out the next steps and approximate timeline of their financial aid process. Applicants with unique circumstances should receive customized roadmap communications.

Professional judgment: Within the communications sent to applicants without unique circumstances, we recommend including language that describes the option for professional judgment. Not all applicants will see the notices elsewhere in the form that describe the

circumstances that could make them eligible for additional aid, such as loss of employment, reduced income, or high medical or child care expenses. It is important that applicants understand these pathways are available to them, even if the tax and income information from two years prior does not reflect their current circumstances.

Public benefits: We are grateful for the Department’s recent guidance to states and institutions about using FAFSA data to conduct outreach to students about public and tax benefits.²⁰ This outreach supports the mission of the federal student aid programs to help students afford their cost of attendance and complete postsecondary education. We request that the Department conduct outreach to applicants about the public and tax benefits they may be eligible for during regular intervals and send follow-up emails to such applicants in case they miss the notices. For example, Pell-eligible or low-SAI students could receive emails about SNAP, WIC, and TANF in the fall, Medicaid and ACA subsidies in the winter (during open enrollment periods), and emails about EITC and education tax benefits during the spring tax filing season. Independents with dependents could receive targeted information about CCDF and the CTC.

Corrections

We have been greatly concerned by 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. While the Department stated that batch corrections will not be available for the 2024-25 cycle, there are still many students who will be using the current form to enroll mid-year, especially at community colleges, through June 30th, 2025—and we encourage the Department to bring batch corrections online for these applicants as soon as possible.

The Department has stated that back-end processes will launch soon after December 1st for the 2025-26 cycle. We encourage the Department to make all corrections—including batch corrections—available swiftly after the form’s launch date and to publicize expected dates for when each type of correction will be available to give applicants, financial aid staff, and college access professionals clarity around this process.

Verification and Conflicting Information

We appreciate the Department’s relief of verification burdens in 2024-25 and 2025-26 FAFSA cycles, especially given the difficulties that students and families have encountered with the financial aid process. We also appreciate the proactive decision to provide clarification on what is not considered to be conflicting information.

²⁰ U.S. Department of Education, Office of Federal Student Aid. (2024, July 29). [*\(GENERAL-24-93\) Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies.*](#)

Recently, the Department published its annual notice of information to be verified in the 2025-26 award year.²¹ This notice included typical notices about certain categories of students needing to submit a statement of educational purpose, government-issued photo identification, and, in some cases, a *notarized statement* of their identity. These substantial administrative burdens could prevent vulnerable students from accessing or completing higher education. They also duplicate the identity validation processes of the FSA ID. We ask the Department to revisit these requirements and remove them where possible.

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.

While we understand the need to protect federal student aid against fraudulent activity, we ask the Department to continue informing financial aid offices about certain categories of students who should not need to complete additional paperwork.

Call Center Staffing

We request a significant boost in the availability of Federal Student Aid Information Center (FSAIC) staff to address hold times, as well as additional training and professional development to improve the quality of staff advice. The call center should be available every day, including federal holidays that occur during the peak of the application season, and reach into the late evening for the West Coast. We also request additional language support to help applicants whose first language is not English, including bilingual staff who can translate words in both English and another language.

We also ask for greater flexibility for call center staff to be able to directly access applicant information and provide customized advice, including the ability for applicants to give verbal consent to FSAIC staff to view and modify their information as needed.

Finally, we also ask that call center staff be permitted to utilize a “warm transfer” or multi-party call that fully utilizes the expertise of local and state college access professionals who may be working with the applicant in real-time and who wish to join the call with the applicant.

Outreach Plans and Initiatives

We urge the Department to expand data-sharing agreements and interagency coordination and outreach plans as called for under sections 483(c)(3) and 485E(c) of the HEA. In particular, we ask the Department to explore all initiatives with agencies that may have data or proxy information that suggest individuals have low or no income, including the U.S. Departments of Treasury, Health and Human Services, and Labor.

²¹ U.S. Department of Education. (2024, September 9). [*Free Application for Federal Student Aid \(FAFSA®\) Information To Be Verified for the 2025-2026 Award Year.*](#)

A 2007-11 experiment with H&R Block provided individuals with low incomes support and assistance in filling out the FAFSA. This experiment resulted in significant increases in the completion of the FAFSA, enrollment in college, and completion of credits among treated individuals.²² The Department should expand this initiative nationwide or, at a minimum, conduct and evaluate another large-scale experiment beginning in the 2025-26 cycle.

We also support efforts to send information about federal financial aid to recipients of other public and tax benefit programs, such as SNAP, unemployment assistance, and the Earned Income Tax Credit. These efforts could substantially boost the uptake of financial aid and economic mobility of individuals with low incomes.

Cost of Attendance

Unfortunately, the Department's current 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).²³ 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.²⁴ 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.²⁵

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, particularly for the 2025-26 Federal Student Aid Handbook.

²² National Center for Education Statistics. (2013, November). *WWC Review of the Report "The Role of Application Assistance and Information in College Decisions: Results from the H&R Block FAFSA Experiment."*

²³ 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.*

²⁴ 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.*

²⁵ See, e.g., HEA Sec. 401(b)(B)(ii)

Conclusion

Again, we thank the Department for its work to overcome 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 the federal financial aid process to make it easier for students to obtain the resources they need to pursue higher education.

Please contact us with any questions you may have and let us know if we can be of further assistance.

Sincerely,



Bryce McKibben
Senior Director of Policy and Advocacy
The Hope Center for Student Basic Needs
Temple University