



April 7, 2025

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/docket/ED-2025-SCC-0011/document>

Re: Docket ID ED-2025-SCC-0011

To Whom It May Concern:

On behalf of The Hope Center for Student Basic Needs, I write to comment on the **2026-27 Free Application for Federal Student Aid (FAFSA)**.

After two consecutive challenging financial aid cycles, the U.S. Department of Education (“Department”) must make further enhancements to the FAFSA this year to support students, families, and colleges—and to meet the intent of Congress when it passed the *FAFSA Simplification Act* more than four years ago.

It is also essential that the Department provide the necessary resources and capacity to ensure the federal financial aid process is stable, reliable, and accessible for students who rely on this assistance to afford college. While this letter primarily addresses the technical changes necessary for the form, **the layout and function of the FAFSA are only relevant if it is consistently available to students and families who use it** and if they can easily access help with common questions and barriers.

The Department’s recent decision to terminate more than 320 staff from Federal Student Aid (FSA), including vendor performance and oversight staff, puts the entire operation of federal financial aid in serious jeopardy. We urge the Department to swiftly rehire these staff members and ensure that 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.

Thank you for the opportunity to provide the following comments on the 2026-27 FAFSA.

Creating or accessing an FSA ID

Permanent address: We appreciate the Department adding the term “mailing” to the section for applicant and contributor addresses, to read “permanent *mailing* address.” This change is important for applicants and contributors experiencing homelessness who lack a permanent address where they reside and call home, but do have a place where they can retrieve mail, such

as a P.O. box. Some students who primarily reside in on-campus housing may not have another address where they live.

We request that FSA ensure students, spouses, or parents have the same option to enter a mailing address when creating an FSA ID on the “Contact Information” page.

We also request that the Department copy over “help text” currently in the notes section of the paper FAFSA, to the contact information question itself. Including the wording (“*If you are homeless or have no stable address, you can provide an address where you can reliably receive mail.*”) as explanatory text next to the question will help applicants provide more accurate answers, including for students who primarily live on campus.

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) while being 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 (parent or spouse) 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) in a note.

Additionally, we strongly suggest adding a note that parents and spouses without SSNs can create an FSA ID without their information being used for purposes other than financial aid, with a clear statement that their data privacy will be protected. There is significant concern that non-citizen contributors will have their data used for penalizing purposes, such as immigration enforcement, which is never an appropriate use of FAFSA data. Alongside this portion of the FSA ID process, we ask that ED assure applicants that it does not intend, either now or in the future, to use FAFSA data for any purpose other than applying for financial aid.

Contributors without an SSN

Students who are U.S. citizens but have undocumented parent(s) or spouses 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, for the last two cycles, the FUTURE Act Direct Data Exchange (FA-DDX) has not functioned for contributors without an SSN, denying them the ability to import 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 urge the Department to ensure full FA-DDX functionality for contributors without SSNs.

We also hope the identity verification process can be significantly streamlined, especially for contributors who must complete the manual process. While this process has improved recently, applicants must still be able to submit a FAFSA while their identity validation process is underway to ensure they can afford to enroll and begin coursework.

Additionally, to enhance federal data security, the Department should create a portal within the FSA ID process that allows users to securely upload their identification documents rather than relying on unsecured emails or phone calls to submit information.

We also request that the Department ensure that the front and back-end processes to set up an FSA ID, invite a contributor, or complete the corrections process without SSN result 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 2026-27 FAFSA, and that help article should be updated to include call center contact information.¹
- 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 data entered into the FAFSA will not be used for purposes other than awarding student financial aid and related benefits, given widespread fears about data security.

User Experience (UX) and Consumer Testing

We appreciate that the Department has made significant strides in advancing the beta testing of the FAFSA over the last year. However, we understand that 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 cadence to allow for user testing that improves the flow, wording, and design of the form before it is finalized for public release.² We hope the Department will commit to rigorous user testing that includes public summary reports from each of the statutorily

¹ U.S. Department of Education, Office of Federal Student Aid. (2024). [How To Submit the FAFSA® Form if Your Contributor Doesn't Have an SSN.](#)

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

required subgroups. Their feedback should be recorded and incorporated into the design of the form. We also request that the results of the consumer testing be made available during next year's public comment period.

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.

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 for the 2026-27 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 explain 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, are titled “State of *Legal* Residence.” The use of the word “legal” causes unnecessary confusion for students and contributors who often associate this phrase with immigration status rather than residency. Instead, we suggest removing the word “legal” from the question title and text and renaming it “Student State of Residence” and “Contributor State of Residence.”

Further, the Department should provide help text clarifying that the state of residence may be different from the state in which the student attends college, if the student attends out-of-state. This help text should specifically articulate that the question refers to an applicant’s home and is not affected by, and does not impact, their citizenship or 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 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 current form asks students whether they received a benefit “at any time during 2024 or 2025,” which will unnecessarily exclude all applicants who receive a means-tested benefit in early 2026, when they may be filling out this version of the FAFSA.

For example, a FAFSA applicant who signs up for Medicaid in 2026 during the open enrollment period would not then be able to check “yes” to this question because it is limited to 2024 and 2025. 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 2026-27 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?”

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.

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 and accessible label such as “*health insurance subsidy under federal 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. 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 varying uses of EITC and EIC throughout the financial aid process will only confuse 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.³

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.⁴ 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.⁵ 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 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, 2025.*” 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**, was the student unaccompanied and either (1) experiencing homelessness, or (2) supporting themselves without parent support and at risk of homelessness?”

Bumper screens: If an applicant indicated yes to the homeless filtering question but selects “none of these apply” to the determination source, the 2025-26 FAFSA showed a confusing “bumper screen” that intended to serve dual purposes for two very different categories of students. Without a 2026-27 preview FAFSA, we cannot determine if this flawed design remains unaddressed.

³ U.S. Department of Education. (2024, July 29). [*\(GENERAL-24-93\) Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies.*](#)

⁴ 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.

⁵ National Center for Homeless Education. (2025). [*FAFSA Data on Unaccompanied Homeless Youth: 2021-2022 through 2023-2024 Application Cycles.*](#)

During the 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.

We appreciate that, in conversations with the Department, it planned to correct the incorrect language on the bumper screen. However, we do not know if this issue has been fully resolved for 2026-27. 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 2026-27. The Department’s prior commitment was not mentioned in the Summary of Enhancements.

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. It is also not permitted by law.

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. This question should 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.

Banner text: A “dependent student” banner typically appears above this question. While we disagree with the existence of the question itself, its current format is also confusing. Within the banner, there is a message that says “*you must provide parent information on our FAFSA form,*” but the question itself allows students to decline to provide parent information—setting up a confusing contradiction. At a minimum, if not eliminated, 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: The question title is confusing. It is unclear what the relationship is between the title (“Apply for a 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.”

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), 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” 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.”

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 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 a separate paper FAFSA. But, if the incarcerated form is maintained as a separate application for 20265-27, 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 ask the Department to confirm this commitment will be implemented for 2026-27, and that students will be given information that explains why the answer to their question has been pre-selected.

Student Demographic Information

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*. The Department should restore both the “Nonbinary” and “Prefer not to answer” options.

Race and ethnicity: We support the addition of “Middle Eastern or North African” (MENA) to the race and ethnicity options in question 12.

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.*”⁶ 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 that is like the instructions it has provided for income-driven repayment, or a link to help students determine their family size.⁷ Alternatively, the Department should copy over the clear text it has provided for students completing verification to ensure

⁶ Federal Student Aid. [10 Common FAFSA Mistakes to Avoid](#).

⁷ U.S. Department of Education, Federal Student Aid. [How is ‘family size’ defined for income-driven repayment \(IDR\) plans?](#)

there are no differences between what the FAFSA instructs students to enter and what the verification process requires.⁸

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 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 2026 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.

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.⁹ 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

⁸ U.S. Department of Education, Federal Student Aid. (2023). [APPENDIX A: 2024-25 Suggested Verification Text](#).

⁹ NASFAA. (2024). [AskRegs: Will the FAFSA Be Provided In Languages Other Than English and Spanish?](#)

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.

Conclusion

We appreciate the opportunity to comment on the 2026-27 FAFSA.

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

Sincerely,



Bryce McKibben
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