



September 13, 2024

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Re: Docket ID ED-2024-FSA-0099

Dear Secretary Cardona:

I write on behalf of the American Association of Community Colleges (AACC). AACC represents the nation's 1,026 community colleges and their students. We are pleased to submit comments on the Request for Information (RFI) published on August 14 in the Federal Register, asking for ways to improve the student experience with the 2025-26 Free Application for Federal Student Aid (FAFSA) and to facilitate more seamless processing of student financial aid information. These comments were written in consultation with financial aid officers at several community colleges across the country and reflect their experiences in the 2024-25 FAFSA cycle.

An accurate and efficient federal financial aid application process is a top priority for community colleges. More than 40 percent of community college students across the United States complete the FAFSA and receive some form of Title IV aid. However, community college officials have long known that this figure does not fully capture the level of financial need on their campuses. Far too many community college students do not fill out the FAFSA and leave critical student aid on the table.

We join the Department in support of the goals of the *FAFSA Simplification Act* and the "Better FAFSA." While the rollout of the 2024-25 FAFSA was and continues to be extraordinarily difficult for our students and campuses alike, we have every hope that once perfected, the new, simplified form and enhanced user experience will encourage more community college students to complete the FAFSA. This will make it more likely that they will ultimately enroll in and complete college and reap the enormous social and economic benefits that a community college education provides.

Unfortunately, the "Better FAFSA" failed to meet this potential during the 2024-25 award year due to a series of delays and compressed timelines, interface and processing errors, and high incidences of colleges receiving Institutional Student Information Records (ISIRs) with

conflicting information. This necessitated corrections and created more points at which students were inclined to drop out of the financial aid process.

We welcome the Department's announcement of a 2025-26 beta testing period to uncover and address errors and difficulties in the user experience and in the transmission of ISIRs to colleges. Similarly, we appreciate the Department's intention to deliver a final, complete FAFSA experience by December 1, rather than another piecemeal rollout as in the current award year. For the purposes of this RFI, we encourage the Department to approach enhancements to the FAFSA's help text and the student/contributor experience with a goal of not only helping them complete the form successfully but specifically decreasing the incidences of conflicting information that require institution- and student-initiated corrections.

This year, community colleges have reported much higher rates than previously of receiving ISIRs where a student's Student Aid Index (SAI) could not be generated due to conflicting information. This is likely due to several factors, including a lack of student familiarity with the new form and a new phrasing of questions. In investigating student and contributor responses, financial aid offices continue to note that certain questions tend to generate inaccurate responses, and students have misunderstood and incorrectly answered questions irrelevant to their aid eligibility. Applicants have also submitted incomplete FAFSAs during both the original submission and corrections process.

Whenever a student submits a FAFSA with conflicting or incomplete information, it creates another delay in generating their SAI, receiving their aid offer, and enrolling in college. In other words, it creates another potential point in the application where a student may abandon the process.

Clarify questions that students and contributors struggle with.

Students and contributors continue to struggle with specific questions in the 2024-25 FAFSA, including the High School Completion Status question, the Direct Subsidized Loan Only question, and the Student Personal Circumstances questions.

As the Department works to enhance help text and the user experience for students and contributors, they should:

- Consider rephrasing questions to use more approachable and user-centered language in the help text for each question. For example, the high school completion question currently reads, *"What will the student's high school completion status be at the beginning of the 2024-25 school year?"* The help text could rephrase the question to read *"When you begin college, will you have earned your high school diploma, earned your GED or other state-recognized high school equivalent, be homeschooled, or none of the above?"*
- Clearly state in the help text why the FAFSA is asking each question and how it relates to determining dependency status and aid eligibility.

- Clearly state in the help text what documentation a student may be asked to provide to their college to verify their status on questions that could trigger a comment code or a verification inquiry.
- For questions that generated high incidences of conflicting information and corrections in 2024-25, have help text appear as a pop-up and require students to read and acknowledge the help text before continuing with the form.

Enhance skip logic to eliminate opportunities for conflicting information and alert students to potential conflicts in the form before submission.

Many community college administrators report receiving ISIRs with conflicting information, and, upon investigation, find that many students and contributors have incorrectly answered questions that were irrelevant to determining their dependency status or aid eligibility. For example, many students have incorrectly answered student personal circumstances questions, including those around veteran status. Reviews of these ISIRs often show that many students had already answered questions on age and marital status that conferred their independent status. Once a student answers a question that confers their dependency status, each additional question around dependency presents only an opportunity for user error that could generate conflicting information.

In other cases, students and contributors answered questions that did not *exactly* match their responses on other parts of the form, previously submitted forms, or the information imported from the direct data exchange (DDX), generating a flag for conflicting information. For example, many students and contributors have had difficulty completing a FAFSA because their address did not exactly match how it was entered on their tax return. This undercuts a key aim of the DDX and the *FAFSA Simplification Act* because it requires students and contributors to have their tax return at hand to successfully complete the form.

As the Department works to enhance help text and the user experience for students and contributors, they should:

- Enhance skip logic to ensure that students are asked to answer only the questions necessary to determine their dependency status and aid eligibility. Ensure that students are not presented with additional questions that serve only to create opportunities for errors and mistakes.
- Where possible, use information generated through the DDX to auto-populate answers to all relevant questions that require an exact match between user-provided information on the FAFSA and information on a user's tax return. If this is not possible, after the DDX match is completed, flag for users where discrepancies exist between entered and imported information with a prompt to use the imported information.
- If conflicting information exists, alert the filer to correct the conflict before submitting and send the student (electronically) to the section that is in conflict. Ask for further review prior to submission with an alert message that informs the student that the application may be delayed if conflicts are not resolved prior to submission.

Ensure that students and contributors complete all required fields on new and corrected FAFSAs.

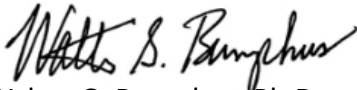
Finally, many community colleges report receiving ISIRs where an SAI could not be generated because the forms are incomplete. In some cases, it appears that students skipped questions and were not prompted to return to the required fields before submitting their FAFSAs. In other cases, students and contributors have returned to a form or completed a correction to a form, and previously completed questions have been blanked out. The form does not prompt these users to reenter answers to these questions, and their FAFSA is submitted incomplete. In particular, colleges report blank SAIs due to a missing field on family size for FAFSAs where a parent's signature was added through the corrections process.

As the Department works to enhance help text and the user experience for students and contributors, they should:

- Ensure that students and contributors cannot submit a new or corrected FAFSA unless all required fields are answered.

Thank you for your attention to these comments. Please contact me or David Baime, Senior Vice President for Government Relations, if you have any questions concerning them.

Sincerely,



Walter G. Bumphus, Ph.D.
President and CEO