



April 7, 2025

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

Re: Docket No.: ED-2025-SCC-0011

Dear Secretary McMahon:

The American Association of Community Colleges (AACC) represents the nation's 1,024 community colleges and their 10 million students. We are pleased to submit comments related to the February 4 Federal Register request asking for ways to improve the student experience with the 2026-27 Free Application for Federal Student Aid (FAFSA) and to facilitate the more effective 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 2025-26 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 been concerned that huge numbers of community college students do not fill out the FAFSA, leaving critical student aid on the table.

While the rollout of the 2024-25 FAFSA was extraordinarily difficult for our students and campuses alike, the 2025-26 process is showing that the new, simplified form and enhanced user experience are encouraging more community college students to complete the FAFSA. Many community colleges are seeing higher percentages of students filing a FAFSA. With that increase comes the hope that, with more eligible students applying for and accessing aid, colleges will be able to increase access, retention, completion, and post-college success among community college students.

While the Department of Education (ED) addressed some of the procedural and administrative challenges associated with the rollout of the 2024-25 FAFSA, the lack of a public comment period for the 2025-26 form made it difficult to fix known problems. We strongly urge the Department to take this opportunity to fully address remaining issues – both with the form and process – utilizing lessons learned from both the 2024-25 and 2025-26 cycles. AACC asks the Department to approach enhancements to the FAFSA to help

students complete the form successfully, decrease incidences of conflicting information, and give colleges the information they need to package financial aid to more accurately reflect cost of attendance to students and families.

Help students and contributors complete the form successfully

By most accounts, the simplified FAFSA has improved the time-to-completion of the form and has minimized incidences where a student begins a form and does not ultimately complete it and file. However, we urge the Department to continue to enhance the FAFSA filing process by clarifying or rephrasing questions that students and contributors struggle with; streamlining currently unintuitive steps for students and contributors with special circumstances; and making optional any questions that are not related to determining a student's dependency status or aid eligibility. These changes are outlined below.

Clarify questions for students and contributors

Students and contributors continue to struggle with certain questions on the 2025-26 FAFSA, including the High School Completion Status question and the Student Personal Circumstances question.

As the Department works to improve the user experience for students and contributors, they should:

- Rephrase the question on **High School Completion Status** to help students answer more easily and accurately. The Department can and should clarify that “none of the previous” means that a student will not have earned any of the preceding high school completion markers when they *begin college* in the 2026-27 school year. We appreciate that the Department attempted to clarify the question in the online form's help text but urge them to use this public comment period to make the initial question clearer and more intuitive.
- Provide students with more information on the definition of **Veteran Status** under the **Student Personal Circumstances** question. Colleges continue to report that students are inaccurately answering the veteran status question, per the definition of a veteran for Title IV eligibility in the *FAFSA Simplification Act*. The new definition refers to any student who falls under Title 38 of the U.S. Code, sections 101(21)-(23). We ask the Department to expand the help text on the online form to include appropriate definitions for “active duty”, “inactive duty”, and “active military, naval, air, or space service”, along with appropriate citations from Title 38 be listed for each activity.

- For each question on FAFSA, the Department should continue to expand and refine help text to clearly state why the FAFSA is asking each question and how it relates to determining dependency status and aid eligibility.

Streamline counterintuitive steps for students and contributors with special circumstances

Students and contributors with special circumstances report difficulties with confusing processes for filling out online and paper FAFSA forms. While we strongly encourage the Department to continue enhancements for all nontraditional applicants, our colleges have reported significant challenges for students and contributors who have lived abroad. These include U.S. citizens who attended high school abroad, U.S. citizens who have parents living outside the United States, and U.S. citizens with contributors who do not have Social Security Numbers (SSNs).

As the Department works to improve the user experience for students and contributors, they should:

- Improve the **High School Question** for students who earned a high school diploma or equivalent credential outside the United States. Currently, students are asked to list “Foreign Country” in the “State” prompt to begin the lookup process. While this process is outlined in the help text, a better option would be for students to be able to check a box indicating that they attended high school outside the U.S. This would make the process more intuitive. Moreover, the Department should continue to enhance the lookup function for students who attend high schools outside the U.S. Most online applicable filers currently report having to manually enter their high school information. The paper FAFSA currently does not include help text or instructions on how to answer the High School Question if a student attended high school abroad. This help text should be added to the paper form.
- Improve the **Parent Contact Information Question** and **Parent State of Legal Residence Question** to be more intuitive for parents and contributors living outside the United States. Currently, contributors who live outside the United States report struggling with how to accurately answer both questions both on the online and paper forms.
- Ensure that the **Direct Data Exchange (DDX)** is operational for students with contributors without a Social Security Number (SSN). For the past two award cycles, students who have a parent or contributor without an SSN have faced confusion, conflicting instructions, and complicated workaround processes to be able to file a FAFSA. We strongly urge the Department to work with the Internal Revenue Service

(IRS) to ensure that the DDX is functional for these students and contributors, to fix this now longstanding challenge.

Make optional any questions that are not related to determining a student's dependency status or aid eligibility

A key goal of the *FAFSA Simplification Act* was to ensure that students and contributors could start and complete a FAFSA form with minimal disruptions, confusion, or concerns, increasing the FAFSA filing rate and thereby expanding access to postsecondary education. As part of this effort, the law sought to remove unnecessary questions and, to the maximum extent practicable, to simplify or make optional any questions that could cause a student to begin, but not complete the form.

We strongly urge the Department to pursue changes and enhancements to the 2026-27 FAFSA that serve that statutory intent. To that end, we ask that the Department maintain a “Prefer Not to Answer” response to any question on the FAFSA that is not directly related to determining a student's dependency status or aid eligibility, including demographic questions collected solely for research purposes.

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

Many community college administrators still 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.

As the Department works to enhance 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.

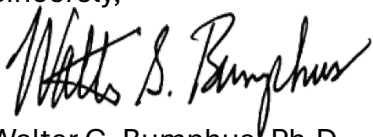
- If conflicting information exists, alert the filer to correct the conflict before submitting and electronically direct the student to the section that is in conflict. Ask for further review prior to submission with an alert message that informs the student that the application may be delayed if conflicts are not resolved prior to submission.
- 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 verification inquiry.

Give colleges the information they need to package financial aid and more accurately reflect cost information to students and families

While community colleges share the goal of making the FAFSA filing process as simple as possible for students and contributors, some questions are necessary to determine a student's aid eligibility and to package financial aid based on that aid eligibility. To that end, we urge the Department to reinstate the **Housing Choice Question** on the FAFSA. While most community colleges are non-residential, it is important for financial aid officers to know if a student is planning on living with their parents or independently, so that they can calculate their Cost of Attendance (COA) and financial aid package. Currently, campuses are having to make assumptions about a student's housing situation based on their dependency status, and students and financial aid administrators must go through additional administrative processes if those assumptions are not correct. Reinstating the Housing Choice Question will simplify the process for both students and financial aid officers, and it will lead to more accurate COAs and financial aid packages.

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.

Sincerely,

A handwritten signature in black ink, reading "Walter G. Bumphus". The signature is fluid and cursive, with the first name "Walter" being more prominent.

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