

**Author Full Name :** Steven Blank**Received Date :** 09/19/2023 02:50 PM**Comments Received :**

The treatment of 529 college savings plans in the Notes on Page 22 under "Assets" needs further clarification.

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Comment #60.a to the first FAFSA draft says:

"1. Clarification: In the Note on page 21 of the FAFSA Form regarding "Investments do not include..." please add "Health Savings Accounts" and "education savings accounts owned by anyone other than the student or the student's parent (such as a grandparent or other relative) regardless of whether the student is the beneficiary" for clarity."

The Formal Response says:

60.a) "Thank you for your comment. This change will be made"

However, this change was not made in the most recent draft on page 22 "Assets"

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Furthermore, the instructions in this latest draft appear to contradict themselves.

First it says, "Parents of dependent students should not report the value of educational savings accounts for other children."

But further on it says, "For a student who must report parental information, the accounts are reported as parental investments in question 40, including all accounts owned by the student and all accounts owned by the parents for any member of the household."

If accounts for other children are excluded as stated earlier, it seems that you perhaps mean "all accounts owned by the parent for any member of the household \*who is not their child\*

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Then it says "Investments do not include" ...529 college savings plans if the student is the beneficiary".

I suspect that you mean "if the student is the beneficiary \*and the account is not owned by the student or parents (such as grandparents)\*"