Author Full Name: Natasha Garfield Received Date: 10/04/2023 12:49 PM

Comments Received:

The Notes on p. 22 provide an explanation of what should be reported as Investments in questions 22 & 40. The 3rd paragraph of the Assets section (which begins "Investments also include qualified education benefits or educational savings accounts...") appears to include contradictory language. It states that "Investments include...529 college savings plans" if the student is not the beneficiary, but then goes on to state that "parents of dependent students should not report the value of educational savings accounts for other children." Later in the paragraph, it states that "[f]or 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." This contradicts the earlier statement that parents "should not report the value of educational savings accounts for other children."

This language is confusing - please simplify it and make it very clear when a 529 plan must be reported as an investment.