



October 13, 2023

RE: Docket No.: ED-2023-SCC-0053

Kun Mullan  
PRA Coordinator  
Strategic Collections and Clearance  
Governance and Strategy Division  
Office of Chief Data Officer  
Office of Planning, Evaluation and Policy Development

Dear Ms. Mullan:

Thank you for the opportunity to respectfully provide comment on the revised draft of the 2024-25 Free Application for Federal Student Aid (FAFSA®) (Docket ID ED-2023-SCC-0053). Please apply the below comments related to the paper FAFSA to the online form as well, since we do not have the benefit of previewing the online form at this time.

1. Page 3 – Where current terminology states “Parent Spouse or Parent Partner”, we think this will cause confusion. We can see a parent who lives with a “partner” who is not the biological parent of the student thinking they must list the “partner’s” information on the FAFSA.
2. Page 4 – In the “Which parent should include information?” section, applicants are instructed “If the parents are divorced or separated, answer the questions about the parent who provides the greater portion of the student’s financial support, even if the student does not live with them.” We expect this to lead to questions about the timeframe for when the greater portion of support was provided. If ED could be clearer in the instructions on the timeframe applicants should use, that will reduce confusion.
3. In the online FAFSA demo in the Parent Wizard, applicants with divorced or separated parents who provide an exact equal amount of financial support to the student are instructed to use the parent with the greater income or assets as the parent of record. The word “or” is a concern here because one parent could have a higher income and the other could have more assets. Changing this to the “greater of income plus assets” would alleviate this concern.
4. Page 10 – Under Federal Benefits Received, clarification is needed with the question on receipt of Means tested benefits. If the entire school received free lunch, then the student/parent should know from the question if they can answer yes to this question or if the student/parent have to qualify for the free or reduced lunch based on income. Additional guidance needs to be provided.
5. Page 11 and Page 17 – Questions 21 and 39 instruct applicants and their parent to report child support received for the last complete calendar year. Applicants may be completing the 2024-25 FAFSA in three different calendar years, leading to inequity in the timing of required data

across applicants. Using the prior-prior year's child support received would provide consistency among applicants.

6. Page 22 – Investment farm is not adequately defined for families, who will have questions as to which business and farm assets must be reported. Many people engage in farming activities but do not consider their property to be a farm, while others receive income from farming but do not engage in farming themselves. Many families reside on their farms and will need clear instructions on how to separate their residence and non-farm land from their farm value. If the intention is for families that own property for which they file an IRS Schedule E or F and report farm income, then that should be indicated in the instructions. Additionally, instructions are needed for treatment of a primary residence that is on family farmland, similar to how families not on farms are able to exclude both the dwelling and the land it sits on from being reported as assets on the FAFSA.
7. Page 22 – The last sentence of the directions regarding 529 under Investments on page 22 is confusing: “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.” This does not match the sentence earlier in that paragraph, which states “Parents of dependent students should not report the value of educational savings accounts for other children.”

In closing, PHEAA would like to thank the U.S. Department of Education (ED) for the opportunity to provide feedback on the revised draft 2024-25 FAFSA. PHEAA, as the administrator of the nation's fifth largest need-based state grant program, recognizes that this is the optimal application process for low-income students who benefit the most from Pennsylvania State Grant dollars.

Please do not hesitate to contact me at [elizabeth.mccloud@pheaa.org](mailto:elizabeth.mccloud@pheaa.org) or at 717-720-1600 if you have any questions regarding these comments.

Sincerely,



Elizabeth K. McCloud  
Vice President  
PA State Grant & Special Programs