

I wish to submit the following comments about the 2nd draft of the 2024-2025 FAFSA that was made available for comment in mid-September, 2023. Thank you for considering these.

Page 1 comments:

Regarding the section: Apply by the Deadlines

The notice to apply via fafsa.gov should provide some reason why that makes better sense if close to the deadline – even if it is to state that the processing time is significantly less. And since that entire section is about applying by the deadline, the mention of the online version of the FAFSA should be at the outset instead of being an afterthought.

Unless the Department's policy is changing, it has never been necessary for a college to have the correct, complete information by your last day of enrollment. Per Volume 4, Chapter 2 text regarding late disbursement: The only requirement has been that the applicant's FAFSA form must have been processed by the Department with an official EFC generated before the student becomes ineligible. As such, the school does not need to have the information by the last day of enrollment. The form just needs to be processed to be eligible for late disbursement consideration. Per past policy regarding late disbursements, it is still acceptable for a school to receive a later transaction of the SAR after the end of the enrollment period provided the SAR for an earlier transaction (that did not list the school) has a processed date and official EFC before the end of the student's enrollment period.

Additionally, past policy has not required that the required official EFC listed on the SAR be the final EFC used to determine aid eligibility as the EFC may change during verification. Therefore, it does not follow why the draft FAFSA states the schools must have your "correct, complete information". The use of the word "correct" may be intimidating to students and other contributors worrying their information must be 100% perfect before the form can be submitted. This is not the case. After all, if all the information needs to be correct, there would not reason to use the term "Corrections" when revisions are being submitted in a later transaction. It would be better to eliminate the word "correct" and instead always use the language "true and complete to the best of your knowledge" that is used in the right column of the "Signatures" section on page 6 of the draft FAFSA.

Note: the "true and correct" text should also be changed at the outside of the aforementioned Signatures section on page 6.

The second paragraph is also misleading. Given the uncertainty about the exact date of the release of the FAFSA – which is likely to be at the end of the month – the statement about deadlines as early as December 2023 does not make sense. I state the end of December in part due to the fact the processor will not be able to ensure the proper calculation of the SAI for those students who received federal work-study earnings since schools have until December (which could be as late as December 31) to submit such earning information for 2022. . It is true that some states and schools may award funds on a funds -available unless exhausted basis for some programs – but that is not the same as having a deadline as early as December. Be aware that virtually all high schools are closed the last week of December and many colleges shut down their office for the week between Christmas and New Year's national holidays. So how can a student check with them if the form comes out after Christmas before January 1.

As such, this entire section should probably be re-written to take into account the delayed release of the FAFSA and the other items mentioned above.

This is global suggestion that applies to all parts of the FAFSA when applicable: In every instance where there is mention of submitting the form, there should be wording used such as “with all required consents containing an original signature”

Regarding the section: Fill Out the FAFSA Form

There should be mention made whether the form must be printed single-sided or if the form can be submitted with the completed pages printed back-to-back.

There also should be a comment if the form is not to be stapled.

There also should be a comment advising the applicant to make sure all the pages are in numerical order and if applicable: to include all pages of the form even if there are no responses on some page. It does state at the bottom of page 1 to send pages 7 through 20, but there should be some mention addressing the issue regarding what needs to be done or not done for pages that have no required responses.

Regarding the section: Special Circumstances ?

It does not seem necessary to list a question mark after the title of this section.

Additionally the last sentence should be changed to reflect that the student should contact the college(s) once the FAFSA is processed (instead of once submitted). And a better word should be used instead of discuss, which infers the communication needs to be done verbally in person – when an email message could be acceptable as well. There is also the issue that even if the FAFSA is processed, the college may not have the information unless they were listed in Question 23.

Regarding the section: Mail Your FAFSA Form

Again, mention should be made that all required signatures need to be provided, given the importance of all the required consents being needed. Perhaps for the second sentence use: Then mail pages 7 through 20 with all the required responses for the applicable Consent, Approval and Signature questions being made with a black or dark-ink pen to:

Regarding the sentence: Extra Postage will be required. There are going to be problems with insufficient postage being used given the number of pages being sent – especially if 14 pages are sent for a form completed single-sided. This is because even if the 14 pages are folded into a regular business size envelope, the thickness of the envelope will result in the postage rates for a “letter” not being applicable. When I did a test of this, the window clerk advised me that the “large envelope” postal rates will apply. So even with the papers inside the sealed business size envelope, the postage would be \$1.83. And so even though the envelope will weigh between two and three ounces, such postage for a three-ounce letter would be insufficient. Additionally, most people when seeing the words “Extra Postage” will assume they need to use postage for up to only two ounces – which is the norm they are used to if the words appear on an envelope that comes with a greeting card. It would be better to use

this sentence or something similar: Prior to mailing, be sure there is sufficient postage affixed to your envelope given the number of pages as well as the size/thickness of the sealed envelope will result in the greater “large envelope” instead of the “letter” U.S. Postal Service rates be applicable.

Page 2 comments:

Regarding the deadlines, these need to be accurate to reflect the proper state deadlines for 2024-2025 due to the delayed FAFSA release. Please check with the states. For example, the deadline for California was already changed in July, yet the traditional March 2 date still appears on the September draft of the FAFSA.

Page 3 comments:

Regarding the section: Completing the FAFSA Form

In the paragraph in the right margin (“If all of the statements...for further guidance”) the wording about parent and parent spouse/partner sections is bit confusing.

It would be clearer to use: “ ... the student should submit the FAFSA with the Parent section and the Parent Spouse or Partner section left blank...”. That is, add the word “section” after the word “Parent” and change “sections” to “section” after the word “Partner”

Page 4 comments:

Regarding the section: Completing the FAFSA Form with the question: Which parent should include information

In the paragraph regarding parents who are divorced or separated:

This should be changed to: “If the parents are divorced or separated and are not living together, answer the questions....”

