



November 15, 2010

U.S. Department of Education  
400 Maryland Avenue, SW., LBJ,  
Washington, DC 20202-4537  
(sent via email to [FAFSA.Comments@ed.gov](mailto:FAFSA.Comments@ed.gov) and [ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov) )

Dear Sir or Madame,

In response to the Federal Register notice published on September 16, 2010 (FR Doc. 2010-23175), I am writing to comment on several of the Federal Student Aid Application materials that the Secretary proposes to use for the 2011-12 award year: the Free Application for Federal Student Aid (FAFSA) and the Student Aid Report (SAR).

The nonprofit Institute for College Access & Success works to make higher education more available and affordable for people of all backgrounds. Through nonpartisan research, analysis, and advocacy, the Institute aims to improve the processes and public policies that can pave the way to successful educational outcomes for students and for society.

We outline our comments for the FAFSA and the SAR separately below.

## **Comments on the FAFSA Public Comment Process**

Our goal in commenting on the 2011-12 FAFSA is to ensure that applying for student aid is as easy as possible for students and their families. We appreciate that the Department has recently made and planned significant improvements to the FAFSA's content and process, and our comments focus on areas where more clarity and streamlining will make the FAFSA easier to understand and use. As discussed further below, it is essential that simplification efforts extend to all print and online products and interactions, so that all potential aid applicants can benefit.

The majority of our recommendations address the paper FAFSA, which was the only consumer-facing FAFSA document provided when the official Notice of Proposed Information Collection Request cited above was published. Unless otherwise specified, our specific recommendations about questions, notes, and instructions follow the format of the 2011-12 draft paper FAFSA, and italics indicate suggested modifications.<sup>1</sup> However, we also offer limited comments on FAFSA on the Web (FOTW) and the FOTW Worksheet.

The draft 2011-12 FOTW Worksheet was added to the documents associated with the information request on or after October 20, 2010, more than a month after the Federal Register notice, and in a way that would only be apparent to those who knew to look. The

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<sup>1</sup> The comments in this document are similar but not identical to those we submitted in response to the 60-day notice published in the Federal Register on September 18, 2009 (FR Doc. E9-22544).

draft FOTW itself is not available for review in either static or interactive form. While the 2011-12 Data Elements and Justification chart provides basic explanations of how skip-logic sequences are intended to work within FOTW, it is of limited use without an accompanying visual depiction of how applicants work their way through the process.<sup>2</sup>

We urge the Department to *release draft FOTW materials at the same time as the draft paper FAFSA and to encourage public review* so that students, financial aid administrators, and other stakeholders can provide the Department with important, timely, and coordinated feedback on these interrelated forms and processes.

## Comments on the Paper FAFSA

### Finding the printable version of the FAFSA

Although the vast majority of FAFSAs are now filed online, the paper FAFSA remains critically important for those who do not have easy and high-quality Internet access. It currently takes a minimum of five steps -- and up to eight steps-- to find the printable PDF of the paper FAFSA from the [www.fafsa.ed.gov](http://www.fafsa.ed.gov) home page.<sup>3</sup> It could take many more steps if a student, family member, or counselor does not already know the correct links to follow and has to search around the site, or does not know that there is an alternative to the online process. While it is reasonable to encourage applicants to file online, those with limited or no Internet access should have easy access to the paper/printable version.

The draft design for a new FAFSA homepage includes this text: “FAFSA Filing Options -- Learn about other options for filing your FAFSA”, and we hope and expect that these options will include a direct link to the printable PDF.<sup>4</sup> However, we continue to recommend that the Department *post a link to the PDF of the paper FAFSA on all student aid related websites* (e.g., [www.fafsa.ed.gov](http://www.fafsa.ed.gov), [www.studentaid.ed.gov](http://www.studentaid.ed.gov), and [www.college.gov](http://www.college.gov)) so that applicants can find it within one or two steps. In addition, the Department should take steps to ensure that the link appears in basic FAFSA-related search engine results so students are not inadvertently directed to commercial web sites offering FAFSA application services for a fee. Finally, the Department should *provide a paper version of the FAFSA in all relevant publications* so that counselors, mentors, and others working directly with students, as well as students and parents themselves, can easily make and share hard copies.

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<sup>2</sup> The Department’s [FAFSA on the Web Demo System](#) includes sample login information and a test version of the 2010-11 FOTW, but we are not aware of any publicly available demo tool for the draft 2011-12 FOTW.

<sup>3</sup> We accessed the PDF version of the 2010-11 FAFSA on September 29, 2010 with the following steps: 1) After arriving at [www.fafsa.ed.gov](http://www.fafsa.ed.gov), click “Student Aid On the Web”; 2) click “Applying for Financial Aid”; 3) click “Funding Your Education”; 4) click “Applying for Financial Aid”; and 5) click “PDF” in the PDF FAFSA section. Attempting to locate the PDF version via “FAQs” on [www.fafsa.ed.gov](http://www.fafsa.ed.gov), requires an even greater number of steps: 1) click “FAQs”; 2) click “Applying for Aid”; 3) click “How do I apply for aid”; 4) click “Completing the FAFSA”; and 5) click either the “PDF” or “HTML” links; 6) click on the “[www.FederalStudentAid.ed.gov](http://www.FederalStudentAid.ed.gov)” link under the heading “How to complete the application” on page 6; 7) click on “For Students”; 8) click on “Other filing options” under the Apply section; 8) click on “PDF.”

<sup>4</sup> Excerpted from the draft “Homepage Redesign (conceptual design)” for [www.fafsa.gov](http://www.fafsa.gov) posted at [http://edicsweb.ed.gov/browse/downloadatt.cfm?pkg\\_serial\\_num=4391](http://edicsweb.ed.gov/browse/downloadatt.cfm?pkg_serial_num=4391), in the document titled [Att\\_FOTW and FAA Access.doc](#).

## **Page 1: Cover Page**

### Using Your Tax Return

The instructions for applicants who have not yet filed a 2010 tax return currently read: “If you are supposed to file a 2010 federal income tax return, we recommend that you complete it before filling out this form. If you have not yet completed your 2010 tax return, you can still submit your FAFSA using best estimates. After you submit your tax return, correct any income or tax information that is different from what you initially submitted on your FAFSA.” We suggest modifying the last sentence to include brief instructions for how to correct or update estimated income and tax information:

“After you submit your tax return, correct any income or tax information that is different from what you initially submitted on your FAFSA *either online at <http://www.fafsa.gov> (using the PIN you receive after your FAFSA has been processed) or by following the instructions on your Student Aid Report (see “Mailing Your FAFSA”).*”

Also, the Department has indicated – and the draft 2011-2012 FOTW Worksheet states -- that the IRS Data Retrieval tool will be available for applicants using the 2011-12 FOTW beginning January 30, 2011. Students and parents who have filed a 1040 income tax form can use this simple tool to electronically pre-populate the FAFSA with their own tax data, if they file online. This section of the paper FAFSA is an important opportunity to promote the simplified online application process and encourage electronic FAFSA filing, and we encourage the Department to add a brief mention of this important option. See below for additional comments related to the IRS Data Retrieval tool.

### Filling Out the FAFSA

Especially in difficult economic times like these, it is critical that students and families know to inform financial aid offices when their tax return does not reflect their current financial situation. We recommend two changes to help applicants understand what kinds of “unusual circumstances” are relevant and how to address them:

1) Reword the phrase that begins with “If you or your family has unusual circumstances...,” to say:

“If you or your family experienced *significant changes to your financial situation since filing your 2010 taxes* (such as loss of employment), complete this form to the extent you can, then submit it as instructed and consult with the financial aid office at the *college(s) where you are applying or attend.*”

2) Move the reworded sentence above so that it becomes the second paragraph of the “Using Your Tax Return” section, since it pertains to using your tax return to fill out the FAFSA.

## **Page 3: FAFSA personal information form**

### Step One

#### Question 18: State of legal residence

We recommend providing some guidance about what “state of legal residence” means in the Notes section.

## Page 5: FAFSA personal information form

### Step Three

The paper FAFSA should, following the general approach of the draft 2011-12 FOTW Worksheet, make clear at the start of Step 3 that answering “Yes” to any one of the questions in this section means that the applicant can skip both the remaining questions in Step Three *and* the entire parent information section (Step 4). Currently applicants are told they may skip Step 4 if they answered “Yes” to any question in Step Three, but not until completing the section and turning to page 6.

At a minimum, because age is the most common way to qualify as an independent student, students who answer “yes” to question 45 (“Were you born before January 1, 1988?”) should be instructed to skip the other Step Three questions.

### Questions 55-57: Unaccompanied homeless youth

Our proposed changes address a persistent statutory problem while simultaneously making it easier for students to understand what they are being asked. As detailed below, we recommend that instead of asking three separate questions that attempt to capture the various ways an applicant might qualify as an independent student due to being homeless or at risk of homelessness, the form should ask just one simple question accompanied by a more detailed Notes section.

Title 20 of the U.S. Code specifies that certain unaccompanied youth meet the definition of independent students if they are homeless or are self-supporting and at risk of homelessness, and if they receive an official determination of their status from one of four sources. However, the draft language for questions 55 and 56 does not currently include those unaccompanied youth who are determined to be self-supporting and at risk of homelessness, as mandated by 20 U.S.C. 1087vv (d)(1)(H). This reproduces an identical omission in the 2010-11 FAFSA (Questions 56-58). The statutory language follows, with italics for emphasis:

“(H) has been verified during the school year in which the application is submitted as *either an unaccompanied youth who is a homeless child or youth* (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act), *or as unaccompanied, at risk of homelessness, and self-supporting*, by—

“(i) a local educational agency homeless liaison, designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act;

“(ii) the director of a program funded under the Runaway and Homeless Youth Act or a designee of the director;

“(iii) the director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (relating to emergency shelter grants) or a designee of the director; or

“(iv) a financial aid administrator; or”;

We recommend replacing questions 55, 56, and 57 -- which are long, confusing, and still do not cover all of the potential combinations of status and source of determination -- with the following single question used as a filtering question in the FOTW:

*“At any time on or after July 1, 2010, were you homeless or at risk of being homeless? (See Notes on p. \_\_\_ for how to answer this question.)”<sup>5</sup>*

The new question would be accompanied by a reference to the Notes section, and the first paragraph of the Notes would read:

*“Answer ‘Yes’ if you received a determination that you were an unaccompanied youth who was homeless, or self-supporting and at risk of homelessness, from any of the following sources at any time on or after July 1, 2010:*

- Your high school or school district homeless liaison*
- The director, or designated staff, of an emergency shelter program funded by the U.S. Department of Housing and Urban Development*
- The director, or designated staff, of a runaway or homeless youth center or transitional living program.*
- A financial aid administrator at the school you attend/plan to attend.”*

Further, the 21-or-younger definition of “Youth” in the Notes for questions 56-58 appears to conflict with legislative intent. Under the draft definition of “Youth” in the FAFSA Notes, unaccompanied homeless youth who are 22 or 23 years old will not be considered independent students and, because these youth do not have access to parental signatures or income information, *they will not be able to apply for federal financial aid.* While the statutory language of Title 20 does not specify ages pertaining to “unaccompanied homeless youth,” the congressional record shows clear intent to provide federal student aid access to unaccompanied homeless youth who would not otherwise qualify as “independent” and are unable to provide parental information.<sup>6</sup> Additionally, the Government Accountability Office, in advising Congress on this and related issues, has defined disconnected youth as “youth aged 14 to 24 who are not in school and not working, or who lack family or other support networks.”<sup>7</sup> Therefore, we recommend revising the Notes as follows:

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<sup>5</sup> “Data Elements and Justification – 2011-2012 Free Application for Federal Student Aid (FAFSA)”, accessed online at [http://edicsweb.ed.gov/browse/downloadatt.cfm?pkg\\_serial\\_num=4391](http://edicsweb.ed.gov/browse/downloadatt.cfm?pkg_serial_num=4391).

<sup>6</sup> Rep. Judy Biggert (R-IL): “The current Free Application for Federal Student Aid, or FAFSA, creates insurmountable barriers for unaccompanied homeless youth--youth that are homeless and alone. These children do not receive financial support from their parents, and many do not have access to parental financial information or a parental signature required by the FAFSA. As a result, unaccompanied homeless youth are prevented from accessing the financial aid they need because they cannot supply the information required by the FAFSA. The FAFSA Fix for Homeless Kids Act addresses these barriers by allowing unaccompanied homeless youth to apply for federal financial aid without providing parental income information or a parent signature. This will open the doors of higher education to some of our nation's most vulnerable youth, and I am pleased that H.R. 2669 includes the FAFSA Fix for Homeless Kids Act.” Congressional Record Vol. 153, No. 132 (September 7, 2007), H10267. Available from: [http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?dbname=2007\\_record&page=H10267&position=all](http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?dbname=2007_record&page=H10267&position=all). Accessed 10/16/09.

<sup>7</sup> GAO noted that the various statutes relating to homeless and disconnected youth do not prescribe an age range. U.S. Government Accountability Office, Report to the Chairman, Committee on Education and Labor, House of Representatives. *Disconnected Youth - Federal Action Could Address Some of the Challenges Faced by Local Programs That Reconnect Youth to Education and Employment*. GAO-08-313. Washington, DC: February 28, 2008. Available from: <http://www.gao.gov/new.items/d08313.pdf>. Accessed 10/16/09.

““Youth” means you are 23 years of age or younger as of the day you sign this application.”

### **Page 9: Notes**

To prevent confusion and make all the relevant information in the Notes section easier for applicants to see and use, we suggest moving the text currently on page 2 of the draft paper FAFSA to page 8. This will create one continuous Notes section on pages 8 through 9, instead of splitting the section between pages 2 and 9.

### **Notes for question 52 (page 5)**

We applaud the changes the Department has made, in line with the comments we submitted last year, to clarify and simplify this question. For further clarification, we suggest changing the portion of the Note that reads “For federal student aid purposes, a ward of the court is not someone who is incarcerated” to say:

“For federal student aid purposes, someone who is incarcerated is *not* considered a ward of the court.”

### **Page 10: What is the FAFSA?**

This important information is counter-intuitively at the end, rather than the beginning, of the paper FAFSA. We suggest moving this text to page 2 (in place of the first page of the Notes section that is currently located there), so that students have an opportunity to learn more about the FAFSA before they start filling it out.

We also recommend adding the following language in italics to the last sentence of the “How do I find out what my Expected Family Contribution (EFC) is?” section for clarification:

*“You can make corrections or provide additional information, as necessary, by following the instructions on page 5 of your SAR.”*

Space constraints understandably limit the amount of information on the FAFSA, but applicants would benefit from knowing a little more about what to expect after submitting the FAFSA. We also encourage the Department to help applicants understand that the FAFSA is just the first step in the aid process, and that their college financial award letter will provide more details about all of the aid they qualify for.

## **Comments Related to IRS Data Retrieval and Transfer (Paper FAFSA, FOTW Worksheet, and FAFSA4Caster)**

We applaud the Department for its successful launch of the IRS Data Retrieval pilot, which became available to some aid applicants in January 2010. The Department has done an admirable job of working with the IRS to develop the process now in place for letting applicants electronically transfer their own tax data into the FAFSA. As we first proposed in our 2007 [Going to the Source](#) report, this is a powerful way to simplify the application process for students and parents, increase the accuracy of the information submitted, and reduce the data verification burdens on both students and schools.

The draft 2011-2012 FOTW Worksheet includes a prominent notice about this new tool, as we recommended in our comments last year. However, the language is dry and understates the key selling point, which is that users can pre-fill the FAFSA with their own tax information with a few clicks of a mouse. The draft main text reads: “Beginning January 30, 2011, students and parents who have completed their 2010 IRS tax return will be able to use the FAFSA on the Web to view the tax information needed to complete the FAFSA. There will also be an option to securely transfer the tax information into the FAFSA.” We suggest something more along the lines of:

“Beginning January 30, 2011, if you or your parents filed a 2010 IRS tax return, you can electronically retrieve and transfer key tax information right into your FAFSA with just a few simple steps.”

Also see our comments above regarding the missed opportunity to promote the IRS Data Retrieval tool on Page One of the paper FAFSA.

We strongly encourage the Department to mark the questions on the FOTW Worksheet, and on the paper FAFSA, that could be pre-populated using the online IRS Data Retrieval tool. The draft 2011-2012 Worksheet currently asks users to fill in several pieces of data from their tax forms that could be pre-populated instead. Further, the Worksheet says in bold type on page 3, “Your parents will need their tax returns and/or W-2 forms to complete the FAFSA,” and on page 4, “You will need your tax returns and/or W-2 forms to complete the FAFSA.” There is no mention of the new tool on these pages, leaving users to assume they have to gather up their tax forms and transcribe the information that the tool could automatically provide instead.

It is critical to note that despite its early availability in the 2011-2012 application cycle, the IRS Data Retrieval tool will not simplify the FAFSA process for all applicants. The current process only draws data from the IRS’ 1040 forms, not from the W-2 or 1099 forms that can provide important earnings information for those who do not file a 1040 because they earn too little to owe federal income tax. In addition, the Data Elements and Justification document for the 2011-2012 FAFSA makes clear that Questions 38 and 39, which ask for income earned from work in 2010, will not be pre-populated with information that could be drawn directly from forms 1040A and 1040EZ or from the W-2. Almost three-quarters of Pell Grant recipients have incomes so low that they do not owe federal income tax, as discussed in more detail in our recent report, [After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid](#).<sup>8</sup> We urge the Department to continue working with the IRS to *improve the data retrieval and transfer process so that all aid applicants have access* to this important simplification tool.

We also encourage the Department to integrate the IRS Data Retrieval tool into the FAFSA4caster as early as possible in 2011, and to make it available to all FAFSA4caster users. Whether in its current form or the simplified structure that the Department has proposed, the FAFSA4caster provides an estimate of financial aid eligibility based on the user’s available financial information.<sup>9</sup> It is not limited to a particular application cycle or

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<sup>8</sup> *After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid*, by Debbie Frankle Cochrane with Andrew LaManque and Laura Szabo-Kubitz. The Institute for College Access & Success, July 2010. Available at <http://ticas.org/files/pub/AfterFAFSA.pdf>.

<sup>9</sup> “Application Processing Update” presented by Michele Brown, Director of Applicant Products and Customer Service, and Marilyn LeBlanc, Director of Application Processing, Federal Student Aid, U.S. Department of Education, at the 2010 national conference of the National Association of Financial

year of tax data. It provides early information that can help students get and stay on the college track, and encourage students and parents to make informed decisions about college affordability and financial aid. When users provide certain identifying information, their FAFSA4caster data can be transferred directly to FOTW. The Department should ensure that the pre-population option and any other improvements to FOTW are also available through the FAFSA4caster.

While nearly all FAFSA applicants now utilize FOTW, an unknown number of individuals may never complete a FAFSA, perhaps due to a lack of reliable Internet access or other reasons related to the complexity of the application process. One recent analysis estimates that nearly 2.3 million enrolled college students would have qualified for the Pell Grant in 2007-08 but did not submit the FAFSA.<sup>10</sup> These students were more likely to attend two-year schools or to be enrolled part-time than those who filed the FAFSA, and they represent missed opportunities to increase academic success and degree completion. We encourage the Department to continue to seek ways to make the entire FAFSA process, both online and on paper, as accessible and easy as possible for all applicants.

## **Comments on the Student Aid Report<sup>11</sup>**

Our goal in commenting on the proposed paper 2011-12 Student Aid Report (SAR) is to ensure that this key step in the financial aid process helps students and their families make informed choices about going to college and how to pay for it. As the Department redesigns and enhances aspects of the FAFSA, FAFSA on the Web (FOTW), and FOTW Worksheet, we urge the Department to continue to include the SAR in a comprehensive effort to improve the financial aid process.

As the 2011-12 SAR is nearly identical to the 2010-11 SAR, the comments that follow are similar to those we submitted in response to the 60-day notice published in the Federal Register on September 18, 2009 (FR Doc. E9-22544). Recognizing that space constraints may limit what can be added to the SAR, we encourage the Department to find ways to incorporate information that could help students and families make informed decisions about paying for college. Following are our recommendations for doing so – unless otherwise specified, italics indicate suggested modifications.

### **Recommendations for the 2011-2012 SAR**

#### Page 1

We encourage the Department to place and present information on the SAR so that it is most helpful for students and their families. The first page should contain a table of contents or outline that tells applicants what they will find in the different sections of the SAR. Also on this page, applicants should be notified of the portability of federal student aid across different types of schools. Applicants need to know that federal aid can be used to cover all common higher education expenses including tuition and fees, living expenses

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Aid Administrators, Denver, CO, July 2010. Available at <http://www.nasfaa.org/Subhomes/AnnualConference2010/handouts/EDAppProcessing.pdf>.

<sup>10</sup> Kantrowitz, Mark. April 2009. *Analysis of Why Some Students Do Not Apply for Financial Aid*. FinAid.org.

<http://www.finaid.org/educators/20090427CharacteristicsOfNonApplicants.pdf>.

<sup>11</sup> The comments in this document are similar, but not identical, to those we submitted in response to the 60-day notice published in the Federal Register on September 18, 2009 (FR Doc. E9-22544).

(room and board), books and supplies, and transportation, miscellaneous, and personal expenses. This important information will help students and their families as they apply for college and review financial aid award letters, since it is a common misperception that financial aid is only for tuition and fees.

In the near future, the Department should also consider incorporating data on net price by income into the SAR. This would give applicants important, school-specific information about the costs they may be expected to cover based on their family's circumstances.<sup>12</sup>

#### Page 2

We recommend moving the Office of Management and Budget's (OMB) legal disclosure and a section reserved exclusively for Financial Aid Office use from page 2 to the end of the SAR packet. The drug conviction warning on page 2 should instead appear below the "What you must do now!" section on page 3.

#### Page 4 – Summary of Federal Student Loans

We suggest that the Department provide applicants with additional information about the availability of different types of loans that may be included in the aid packages they later receive from schools. This information should highlight the better terms and borrower protections of federal student loans and warn students and families about the risks of private student loans. By getting this valuable information early in the aid process, applicants would have the tools to make better decisions about whether, how, and how much to borrow.

Applicants should also be informed about the types of federal loans for which they may be eligible and the basic terms of these loans, as well as maximum loan amounts.

The third paragraph on the "Summary of Federal Student Loans" page that contains information from NSLDS about the applicant's loans is confusing and should be deleted. Instead, first-time and repeat applicants should be able to view the current interest rates for federal loans in a column under the "Total Amount of Loans Outstanding:" section. If an applicant already has outstanding federal loans, the applicable rate for those loans should also be provided. Additionally, a link to a web-based calculator that estimates payments based on the applicant's loans and terms would provide them with a more accurate estimate of the total costs of the loans.

#### Check Your SAR (Pages 5 – 10)

Throughout this section, instructions should be clarified so that students know that they only need to make corrections if they find a mistake, or if the earlier part of the SAR indicated that they need to make a correction. We suggest eliminating the fourth bullet point, "Use your Federal Student Aid PIN to make corrections online at [fafsa.gov](http://fafsa.gov) or send in pages 5-10 of this form," and creating a new set of instructions for the header on page 5. We recommend that the Department use a slightly revised version of the instructions provided on page 3 of the SAR:

"If you need to make corrections to your information, you may either make them online at [www.fafsa.gov](http://www.fafsa.gov), or by using this SAR *and mailing pages 5-10 to the address provided on page 10*. You must use your Federal Student Aid PIN to access your record online. If you

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<sup>12</sup> The Higher Education Opportunity Act of 2009 added section 132(i), paragraph (5) to the Higher Education Act, requiring the Secretary to collect and make publicly available the tuition and fees and net price (cost of attendance minus grants) for institutions starting in July 2010.

need additional help with your SAR, contact your school's financial aid office or the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243).”

On page 10, the instructions in bold are confusing because they do not remind applicants that they need only follow the directions if they are submitting new information or corrections. The instructions that currently state, “Please read, sign, and date. You must read and sign this Certification.” should change to:

*“If you need to submit changes or corrections to the information on this form, please read, sign, and date before submitting. You must read and sign this Certification to confirm any changes you have made.”*

As we stated in our comments last year, we encourage the Department to provide applicants with contact information for the financial aid offices of the schools they selected to receive FAFSA results. Contact information for the financial aid offices of schools is not available via the College Navigator web site, so listing a phone number on the SAR would be a great help to applicants who need to speak with a financial aid representative. We also recommend that the statement about using College Navigator move from the bottom of page 9 to the first page of the SAR so that applicants are more likely to see it. We further suggest changing the language that references only graduation and retention rates on College Navigator to highlight the fact that other important consumer information is available on the web site:

*“For important consumer information about the colleges you listed on your FAFSA, view your Student Aid Report online at [www.fafsa.gov](http://www.fafsa.gov) or visit College Navigator at [www.nces.ed.gov/collegenavigator](http://www.nces.ed.gov/collegenavigator).”*

Finally, it is important that these recommendations also be incorporated into the online version of the SAR. Currently, applicants receive an email confirming that their FAFSA has been processed and that their SAR is available online. Applicants are also directed to review their SAR to see if any changes are necessary, and are provided a hyperlink to click on to do so.

However, when federal aid applicants arrive at the website they are directed to, it is not immediately evident how they should proceed. The screen that appears requires applicants to click on a link labeled “Transaction \_\_\_” (Appendix 1) and the accompanying language currently instructs applicants that “You can select any of the transaction numbers to view the complete details for that transaction.” This instruction should be updated to say “You can select any of the transaction numbers to view the complete details for that transaction, and make any necessary changes.”

When applicants click through on a transaction link, the next web screen they are directed to includes their “Processing Information,” with a button below to “Make Corrections” (Appendix 2). If the goal of directing aid applicants to this site is to review and, if necessary, correct their SARs, a better web screen to direct applicants to would be the “SAR Comments” screen (Appendix 3). This screen reiterates the applicant’s EFC and Pell Grant eligibility, and some general information about the information submitted. It also directs applicants to a checklist of “What You Must Do Now” that includes unresolved issues with the FAFSA and directions for making corrections to the applicants’ information. To improve this screen as a “home” screen for applicants reviewing/editing

their SARs, we suggest adding a new sentence as the first sentence under “What You Must Do Now”:

“WHAT YOU MUST DO NOW (Use the checklist below to make sure that all of your issues are resolved.)

*Review each section of the information you submitted by clicking on each item in the menu to the left of your screen to see if any additional information or corrections may be needed.*

If you need to make corrections to your information, select the 'Make Corrections' button at the bottom of the given page. You must use your Federal Student Aid PIN to access your record online. If you need additional help with your SAR, contact your school's financial aid office or the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243). If your mailing address or e-mail address changes, you can make the correction online or call 1-800-4-FED-AID and ask a customer service representative to make the change for you.”

Also, the “SAR Comments” and “Processing Information” options should trade places in the left sidebar menu, so that SAR Comments is first in the list.

Thank you for the opportunity to comment on the proposed 2011-12 Federal Student Aid application materials. If you have any questions or concerns regarding our comments, please do not hesitate to contact me by phone at (510) 318-7900, or via email at [ljasher@ticas.org](mailto:ljasher@ticas.org).

Sincerely,



Lauren J. Asher  
President

## Appendix 1

Transactions - Student Access Online - Federal Student Aid - Windows Internet Explorer

https://fafsa.ed.gov/FOTWWebApp/StudentAccessServlet;jsessionid=0001x2tMZfXZlmslscyColBVd1:120nslidc

START HERE GO FURTHER FEDERAL STUDENT AID FAFSA Free Application for Federal Student Aid

Help Contact Us FAQs

**Student Access**

**Transactions**

Below is a list of the 2010-2011 transactions we have processed for you as of 10/17/2010. You can select any of the transaction numbers to view the complete details for that transaction.

Your Data Release Number (DRN) is 4663.

Note that any applications or corrections that have been submitted recently will not appear here until they have been processed.

Transaction Number	Processed Date	Expected Family Contribution (EFC)	Transaction Source
01	05/13/2010	23524	Renewal on the Web

NEED HELP? EXIT

Site Last Updated: Sunday, September 26, 2010

Privacy

Must click on the Transaction Number "01" to proceed

## Appendix 2

Processing Information - Student Access Online - Federal Student Aid - Windows Internet Explorer

https://fafsa.ed.gov/FOTWWebApp/StudentAccessServlet;jsessionid=0001ZozSKDYrVIZgHwM1NgGhO:120nslidc

START HERE GO FURTHER FEDERAL STUDENT AID FAFSA Free Application for Federal Student Aid

Help Contact Us FAQs

**Student Access**

**Processing Information**

**Processing Information**

DRN: 4663

Transaction Number: 01

Date Application Completed: 05/12/2010

Application Receipt Date: 05/12/2010

Processed Date: 05/13/2010

Signed By: APPLICANT ONLY

EFC: 23524

NEED HELP? MAKE CORRECTIONS EXIT

Site Last Updated: Sunday, September 26, 2010

Privacy

At the next screen, the applicant is provided with the option to "make corrections" at the bottom of the screen, but it makes it seem as if you'd be making corrections to the processing information itself

## Appendix 3

SAR Comments - Student Access Online - Federal Student Aid - Windows Internet Explorer

https://fafsa.ed.gov/FOTWWebApp/StudentAccessServlet;sessionId=0001ZozxSKDYrVIZgHwMlNgGH0:120nsidc

Transactions

Processing Information

Student Information

Student Income/Assets

Parent Information

School Information

Preparer's Information

NSLDS

**SAR Comments**

Print Summary

**Student Access**

**SAR Comments**

**Comments About Your Information**

Based on the information we have on record for you, your EFC is 23524. You are not eligible for a Federal Pell Grant but you may be eligible for other aid. Your school will use your EFC to determine your financial aid eligibility for other federal grants, loans, and work study, and possible funding from your state and school.

You reported that you will either have a bachelor's degree by July 1, 2010 (Item 27) or will be working on a degree beyond a bachelor's degree (Item 48). Graduate students are eligible for most types of federal aid, but generally not the Federal Pell Grant.

WHAT YOU MUST DO NOW (Use the checklist below to make sure that all of your issues are resolved.)

If you need to make corrections to your information, select the 'Make Corrections' button at the bottom of the page. You must use your Federal Student Aid PIN to access your record online. If you need additional help with your SAR, contact your school's financial aid office or the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243). If your mailing address or e-mail address changes, you can make the correction online or call 1-800-4-FED-AID and ask a customer service representative to make the change for you.

You did not answer the question about your plans to take coursework that will enable you to become a teacher. We asked this question because there is a new federal student aid program for students who plan on becoming teachers.

If instead, you clicked on “SAR Comments,” you would learn how to proceed to make corrections.