

November 30, 2011

Office of Information and Regulatory Affairs  
*Attention:* Education Desk Officer  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW, Room 10222  
New Executive Office Building  
Washington, DC 20503  
(sent via email to [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov) and [ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov))

Dear Sir or Madame,

In response to the Federal Register notice published on October 31, 2011 (FR Doc. 2011-28133), I am writing to comment on several of the Federal Student Aid application materials that the Secretary proposes to use for the 2012-13 award year: the paper and online versions of the Free Application for Federal Student Aid (FAFSA) and the Student Aid Report (SAR).

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

Our goal in submitting these comments is to ensure that applying for student aid is as easy as possible for students and their families. We appreciate that the Department has continued to improve 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.

Unless otherwise specified, our specific recommendations about questions, notes, and instructions follow the format of the 2012-13 draft paper FAFSA, and italics indicate suggested modifications.<sup>1</sup>

Our comments below are organized into four main sections: the FAFSA Public Comment Process, the paper FAFSA, the IRS Data Retrieval Tool, and the SAR (paper and online). Limited comments on FAFSA on the Web (FOTW) and the FOTW Worksheet are included in the section on the IRS Data Retrieval Tool.

## **The FAFSA Public Comment Process**

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<sup>1</sup> Many but not all of the comments in this document are similar to those we [submitted last November](#) on the draft 2011-12 FAFSA materials in response to the Federal Register notice posted on September 16, 2010 (FR Doc. 2011-23175). These similarities reflect aspects of the materials that did not change and that we still believe should be improved. Our previous comments are all available online at [www.ticas.org](http://www.ticas.org).

While the draft 2012-13 FOTW Worksheet is included in the attachments for this information collection request, the draft FOTW itself is not available for review in either static or interactive form. In prior years, a “Data Elements and Justification” chart provided basic narrative explanations of the content and skip-logic sequences of FOTW, and what had changed from the previous year’s version. This year there is no such document included, so we refer to the “Summary of Changes for the Application Processing System 2012-2013” document, which describes some planned changes to FOTW but is not organized to facilitate comparison or analysis. This document was not referenced in the information collection request, and we were only aware of it through prior experience with financial aid policy and processes. In either case, these textual descriptions of FOTW are of limited use without an accompanying visual depiction of how applicants work their way through the process. The schedule for the 2012-13 application processing system indicates that a preview of the 2012-13 FOTW will not be available until December 18, 2011, two weeks before the system goes live for applicants.

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.

## **The Paper FAFSA**

### **Finding the printable version of the FAFSA**

We greatly appreciate the Department’s efforts to make the paper 2011-12 FAFSA easier to find, as we recommended in our comments last year. It now takes only two steps from the [www.fafsa.ed.gov](http://www.fafsa.ed.gov) home page (clicking on “FAFSA Filing Options” and then on a link to the PDF) to retrieve the printable PDF of the paper FAFSA, down from a minimum of five steps the previous year.<sup>2</sup> We hope and expect that the 2012-13 PDF will be at least as easy to find.

Although the vast majority of FAFSAs are now filed online, the paper FAFSA remains critically important for those who do not have convenient, private or high-quality Internet access. The improved placement of the PDF is an important step toward ensuring easy access to the paper/printable version for those who need it, while still encouraging applicants to file online if possible. We recommend that the Department *include a similarly prominent link to the PDF* on [www.college.gov](http://www.college.gov) under “How to Pay: Apply for federal student aid” and on the FSA “FAFSA Information” web page as well.<sup>3</sup> 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.

### **Page 1: Cover Page**

#### **Using Your Tax Return**

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<sup>2</sup> We accessed the PDF version of the 2011-12 FAFSA on November 17, 2011 with the following steps: 1) After arriving at [www.fafsa.ed.gov](http://www.fafsa.ed.gov), click “FAFSA Filing Options”; 2) under “Complete a PDF FAFSA” click “The 2011-2012 School Year (July 1, 2011 - June 30, 2012).”

<sup>3</sup> The FSA “FAFSA Information” page can be found at <http://studentaid.ed.gov/PORTALSWebApp/students/english/fafsa.jsp>.

We appreciate the revision of this section to highlight the IRS Data Retrieval Tool as the easiest way to correct estimated tax information with actual tax information, as we suggested last year. However, the instructions still do not make clear that the IRS Data Retrieval Tool can be used to fill out the FAFSA the first time, not just for corrections, and that after filing the FAFSA, the student will receive a Student Aid Report (SAR) with instructions for how to make corrections if necessary.

The Department has indicated – and the draft 2012-13 FOTW Worksheet states – that the IRS Data Retrieval tool will be available for applicants using the 2012-13 FOTW beginning February 1, 2012. This section of the paper FAFSA is an important opportunity to promote the simplified online application process and encourage electronic filing.

We suggest changing the text of this section to encourage the use of FOTW and the IRS Data Retrieval Tool both for initial application and for any corrections:

*“If you (or your parents) need to file a 2011 income tax return with the Internal Revenue Service (IRS), we recommend that you complete it before filling out the FAFSA. Starting February 1, 2012 most students and parents who filed their 2011 tax returns can easily view and transfer their tax information into the online FAFSA at [www.fafsa.ed.gov](http://www.fafsa.ed.gov).*

*If you have not filed your tax return yet, you can submit your FAFSA now using estimated tax information. After you submit your tax return, you can make any necessary corrections through [www.fafsa.gov](http://www.fafsa.gov), or follow the instructions on your Student Aid Report (see “Mailing Your FAFSA”).”*

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 2011 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

We appreciate the changes to the instructions at the start of Step 3, which now clarify 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).

### 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 continue to 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 2011-12 FAFSA. 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 2011-12 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.)”*

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 55-57 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>4</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>5</sup> Therefore, we recommend revising the Notes as follows:

““**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 pages 2 and 9 of the draft paper FAFSA to the end of the form. This will create one continuous Notes section on pages 9 through 10, instead of splitting the section between pages 2 and 9. (Also see our recommendation below to move “What is the FAFSA?” from the last page to page 2).

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<sup>4</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 November 30, 2011.

<sup>5</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 November 30, 2011.

### Notes for question 52 (page 5)

We applaud the Department for further clarifying this section of the Notes by revising the sentence that now reads: “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 still 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, through FAFSA on the Web at [www.fafsa.gov](http://www.fafsa.gov) (using your PIN) or by following the instructions on page 5 of your SAR.”*

Space constraints understandably limit the amount of information on the paper form, 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.

## **The IRS Data Retrieval Tool**

We applaud the Department for its continued enhancement and deployment of the IRS Data Retrieval Tool during the 2011-12 application cycle, and for highlighting the tool in draft materials for the 2012-13 cycle. However, these materials tend to understate the tool’s benefits and ease of use.

### Treatment in the draft FOTW Worksheet and paper FAFSA

On the first page of the draft FOTW Worksheet, for example, the text in the “Applying is easier with the IRS Data Retrieval Tool!” box reads: “Beginning February 1, 2012 students and parents who have completed their 2011 IRS tax return will be able to use FAFSA on the Web to electronically view their tax information. With just a few simple steps, the tax information can also be securely transferred into the FAFSA.” We suggest something more along the lines of:

*“Starting February 1, 2012 students and parents who have filed their 2011 IRS tax returns will be able to securely view and transfer their own tax information right into the online 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 1 of the paper FAFSA as a benefit of filing and correcting the FAFSA online.

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 2012-13 Worksheet currently asks users to fill in several pieces of data from their tax forms that could be pre-populated instead, but this is not made clear to the user.



While we commend the Department for mentioning the IRS Data Retrieval Tool in a box on page 3 labeled “Did you know?” and describing it as “the easiest way to provide accurate tax information,” this text and its location are too easy to miss compared to more prominent and repeated exhortations to have your tax returns in hand. The bold text at the bottom of the box to the immediate right, titled “Did your parents file or will they file a 2011 tax return?”, says, “Your parents will need their tax returns and/or W-2 forms to complete the FAFSA.” This appears to contradict the adjacent message encouraging use of IRS Data Transfer. There is a similar problem with the boxes at the top of page 4. We recommend merging the adjacent boxes and using the expanded space to help applicants understand how the IRS Data Retrieval Tool can make the FAFSA easier to complete, and when they can expect their tax information to be available for transfer.

#### New filtering questions, dynamic messages, and email notifications

The Department’s 2012-13 “Summary of Changes for the Application Processing System,” released this month, highlights some planned enhancements to the IRS Data Retrieval Tool. The new filtering question and corresponding messages are a very positive step towards making the process more transparent. We were particularly pleased to see that “I recently filed my taxes” was among the possible responses to the filtering question, and that the resulting message clearly explains how long such applicants might have to wait before their tax data is available for transfer (up to two weeks for those who filed their tax return electronically, and eight weeks for those who filed by mail). Providing this information before giving applicants the option to use the Tool should go a long way towards reducing discouragement and confusion if they cannot yet view their data. We hope the Department will continue to work with the IRS to ensure that messages the applicant receives from the IRS web site are similarly helpful.

The Department’s planned email notifications encouraging eligible applicants to use the Tool are a welcome effort to increase awareness and usage. We encourage the Department to use consumer-friendly language emphasizing the benefits of the tool in these targeted messages.

#### Browser issues and messages

One problem that may hinder some applicants’ access to the IRS Data Retrieval Tool is the error messages regarding browser versions on FOTW. Right now, using the latest version of Mozilla Firefox (v. 8.0), it is possible to access the FOTW home page ([www.fafasa.ed.gov](http://www.fafasa.ed.gov)) but clicking on the “Start here” button brings up an error page with the header “An Incompatible Browser Has Been Detected.”<sup>6</sup> The page lists the supported versions of Firefox as 3.5 and 3.6 and provides a link to “upgrade Firefox” but following that link would lead to downloading the latest version, which is what led to this error page in the first place. The latest versions of Microsoft Internet Explorer and Google Chrome will work but bring up an “Unsupported Browser Detected” message that recommends clicking on a link to download a supported browser. The list of supported browsers includes older versions of Internet Explorer and Chrome. FOTW should support the latest versions of the major browsers as well as previous versions that are still widely used.

#### Additional suggestions for improvement

We continue to strongly urge the Department to work with the IRS to extend the substantial benefits of IRS data retrieval to more applicants and potential applicants, as discussed in our comments last year. In its current form, the Tool only draws data from IRS 1040 forms, not from the W-2 or 1099 forms that can provide important earnings information for those who do not file

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<sup>6</sup> We encountered these errors using a computer with the Windows 7 operating system.

a 1040 because they earn too little to owe federal income tax. 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 2010 report, [\*After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid.\*](#)<sup>7</sup>

We encourage the Department to consider how the IRS Data Retrieval Tool could be integrated into the FAFSA4caster. This would not only help provide early aid eligibility estimates to students and parents just beginning to explore college options and affordability, but also make them aware of the Tool well before they face the FAFSA itself.

We also suggest that the Department provide screenshots, if not a demo site, for future planned enhancements to the FOTW, especially the IRS Data Retrieval Tool features, to facilitate public input before they are finalized.

## **The Student Aid Report**

Our goal in commenting on the proposed paper 2012-13 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 continues to enhance aspects of the FAFSA, 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 draft 2012-13 SAR is nearly identical to the 2011-12 SAR, the comments that follow are similar to those we submitted last year. Recognizing that space constraints may limit what can be added to the paper 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 2012-13 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 (room and board), books and supplies, and transportation and miscellaneous 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 the selected colleges' net price by income or links to their newly required net price calculators into the SAR.

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<sup>7</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>.



This would give applicants important, school-specific information about the costs they may be expected to cover based on their family's circumstances.<sup>8</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 and the fact that they can borrow less than the maximum.

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 [www.fafsa.gov](http://www.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 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

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<sup>8</sup> Net price data have been posted on the Department of Education's College Navigator web site since July 2010. Net price calculators have been required on all Title IV participating colleges' web sites since October 29, 2011, and the Department has indicated that the URLs for the calculators will be posted to College Navigator.

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 10 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, retention, and transfer 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).”*

#### Online SAR

Finally, it is important that these recommendations also be incorporated into the online version of the SAR. Currently, applicants who provide an email address on the FAFSA receive instructions for accessing the online SAR within a few days; others receive a paper SAR within a few weeks.

Although a draft of the 2012-13 paper SAR is included in the attachments for this information clearance package, there is no static or interactive version of the draft online SAR for 2012-13 available for review. To get a sense of what students currently see after their 2011-12 FAFSA has been processed, we logged in to the FAFSA demo site at <http://fafsademo.test.ed.gov/>.<sup>9</sup> Logging in to FOTW as an applicant whose FAFSA has been successfully processed, the screen shows two prominent buttons for viewing the online SAR: “View Processed Information (PDF Version)” and “View Processed Information (HTML Version). There are also much smaller links farther down the page that say “Make FAFSA Corrections” and “View Correction History.”<sup>10</sup> The purpose of viewing processed information is to determine if you need to make corrections, but this is not made clear enough in the current layout and text. To clarify the purpose of presenting the processed FAFSA information in the SAR and the instructions for making corrections, we suggest modifying the text under “WHAT YOU MUST DO NOW” on both the PDF and HTML versions of the online SAR to say<sup>11</sup>:

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

*Review the information you submitted on the FAFSA (shown in the table below) to see if any additions or corrections may be needed.”*

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<sup>9</sup> Information about using the FAFSA Demo site can be found at <http://www.fsa4counselors.ed.gov/clcf/FAFSADemo.html>. Accessed November 28, 2011.

<sup>10</sup> See Appendix A for a screenshot.

<sup>11</sup> See Appendix B for a screenshot of this part of the online SAR as it appears in the FOTW demo.

If you need to make corrections to your information, go the [FAFSA on the Web Corrections](#) 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.”

Since this document is presented online, the reference to the FOTW Corrections page should be a clickable link, not a set of directions that requires the applicant to go back to the main “My FAFSA” page to find a link to the corrections page, as is currently the case.

The PDF version of the SAR that comes up has a somewhat more streamlined format overall than the paper SAR, with the “WHAT YOU MUST DO NOW” section well placed on page 1 under the EFC and aid eligibility information and, as we recommend for the paper SAR, the OMB notification is on the last page instead of page 2.

The HTML version for this demo applicant was very similar to the PDF version, except the table under “FAFSA Data,” showing the applicants responses to the FAFSA questions, was missing. Assuming that feature works correctly on the live site, our only other suggestion for this version would be to revise the “WHAT YOU MUST DO NOW” section as described above.

Thank you for the opportunity to comment on the proposed 2012-13 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



Welcome, Abe Logout

 

STUDENT

### My FAFSA

Welcome, Abe Demolastrname

2011-2012

#### Current Application Status: Processed Successfully

Your application was processed successfully.  
You should review it for accuracy.

[VIEW PROCESSED INFORMATION \(PDF VERSION\)](#)

[VIEW PROCESSED INFORMATION \(HTML VERSION\)](#)

Original Application  
Submitted: 01/01/2011  
Processed: 01/01/2011  
DRN: 8275

Latest Correction  
Submitted: 01/03/2011  
Submitted By: Student  
Processed: 01/03/2011

You can also:

- [Make FAFSA Corrections](#)
- [View Correction History](#)

#### Federal Student Aid PIN

PIN Status: Active [Request A Duplicate PIN](#)

You can use your PIN to sign your FAFSA electronically or make corrections to your FAFSA.

[NEED HELP?](#)

Appendix B

Processed Information

Federal Student Aid FAFSA<sup>SM</sup>

Form Approved  
OMB No. 1845-0001  
App. Exp. 12/31/2012

2011-2012 Electronic Student Aid Report (SAR)

The SAR summarizes the information you submitted on your 2011-2012 Free Application for Federal Student Aid (FAFSA).

Application Receipt Date:	01/01/2011	XXX-XX-0004 DE 03
Processed Date:	01/03/2011	EFC: 06470 DRN: 8275

Comments About Your Information

Based on the information we have on record for you, your EFC is 06470. 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.

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, click 'Make FAFSA Corrections' on the 'My FAFSA' 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.

FAFSA Data

Assumed fields, based on the data you entered, are marked with an "\*" (asterisk) sign.