

May 20, 2016



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Director of the Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Avenue SW, LBJ, Room 2E-105  
Washington, DC 20202-4537  
(submitted electronically via: <http://www.regulations.gov>)  
Re: Docket ID: ED–2016–ICCD–0036

Dear Director:

In response to the Federal Register notice published on March 29, 2016, I am writing to comment on the draft 2017-18 Free Application for Federal Student Aid (FAFSA).

The Institute for College Access & Success (TICAS) is an independent, nonprofit organization that 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 the student aid application process is as easy and transparent as possible for students and their families. The Administration has already taken important steps to substantially simplify the FAFSA, including by letting students apply for aid earlier and more easily starting in the 2017-18 aid year, a change long championed by TICAS. We have also recommended ways to further simplify the financial aid application process by eliminating 20 burdensome FAFSA questions,<sup>1</sup> which we recognize is beyond the scope of this information collection.

The Department has continued to improve the aid application process by adding Medicaid receipt as a qualification for the simplified needs test in questions 75 and 97. While our comments below include suggestions for clarifying the instructional language for these questions, we applaud the Department for making this important change. As noted by the Center for Law and Social Policy (CLASP) in their comments on the draft 2017-18 FAFSA, it will “simplify and shorten the FAFSA application process for hundreds of thousands of low-income individuals and thus increase their opportunities to receive the full financial aid for which they are eligible.”<sup>2</sup> We also thank the Department for providing additional guidance to students who might face unexpected costs that could affect their financial need, by modifying the “unusual circumstances” text on the final 2016-17 FAFSA and retaining this text in the draft 2017-18 FAFSA.

We are also encouraged by ongoing conversations between Federal Student Aid (FSA) and the Internal Revenue Service (IRS) exploring ways to enhance the IRS Data Retrieval Tool (DRT). Our comments reflect our recommendations that such discussions continue to seek ways to expand access to the DRT where possible, and we look forward to hearing about the outcomes of this ongoing work.

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<sup>1</sup> The Institute for College Access & Success (TICAS). 2015. *Recommendations for Eliminating Specific FAFSA Questions to Further Simplify the Federal Student Aid Application Process*. [http://ticas.org/sites/default/files/pub\\_files/simplifying\\_fafsa\\_by\\_eliminating\\_specific\\_questions\\_final\\_06-29-15.pdf](http://ticas.org/sites/default/files/pub_files/simplifying_fafsa_by_eliminating_specific_questions_final_06-29-15.pdf).

<sup>2</sup> Public comments of the Center for Law and Social Policy on the draft 2017-18 FAFSA, submitted to the US Department of Education on May 12, 2016 <http://www.clasp.org/resources-and-publications/publication-1/CLASP-Comments-ED-2016-ICCD-0036.pdf>

While outside the scope of the current request for comments, we would like to note here our concern about the Department’s new verification hurdle for non-tax-filers in 2017-18, requiring such FAFSA applicants flagged for verification to secure and submit a form from the IRS confirming that they did not file taxes. Low-income students face significant hurdles during the verification process.<sup>3</sup> Given this requirement’s potential for additional burden on students who did not file a federal tax return because their income was too low to owe federal income tax, we strongly encourage the Department to provide data demonstrating the need for and potential benefits of this requirement. This new paperwork would be in addition to a statement self-certifying they did not and were not required to file taxes and also providing the amounts and sources of their earned income. IRS information indicates that a request for this form could take up to 10 business days to process,<sup>4</sup> and the form simply confirms that the student or parent did not file taxes without indicating whether or not they were required to.

Our comments below focus on areas where more clarity and streamlining will make the FAFSA easier to understand and use, helping applicants get the aid for which they are eligible. Unless otherwise specified, our recommendations about questions, notes, and instructions follow the organization of the 2017-18 draft paper FAFSA. Where applicable, *italics* indicate suggested modifications, ~~strikethroughs~~ indicate suggested deletions, and underlines suggest text relocation. Our recommendations also apply to FAFSA on the Web (FOTW) and FAFSA on the Phone (FOTP) wherever relevant. 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. Our comments include some new and many prior recommendations, and are organized into four main sections: the FAFSA, the FAFSA submission page, the IRS Data Retrieval Tool, and the FAFSA public comment process. Limited comments specific to FOTW are included throughout this document.<sup>5</sup>

## **The FAFSA**

### **Page 1**

#### **Modify text of “Using your Tax Return” section**

The section “Using Your Tax Return” on page 1 can provide more clear direction by putting the most important information at the top, relocating information related to application deadlines to the “Applying by the Deadlines” section, and clarifying that this form requests tax data from 2015.

We strongly recommend that this section start with information relevant to its title by moving to the top what is currently the second paragraph, which begins with “The easiest way...” Furthermore, to clarify the change to using the tax data available in the fall, the last sentence of this paragraph should be, “This form requests information from your (or your parent’s) 2015 tax filing.” Relocating the draft section’s current first sentence, as recommended below, creates space for this new sentence. The second paragraph of this section would then begin, “If you (or your parents) have missed the 2015 tax filing deadline...” The third paragraph, starting with “Note:” would remain the same in text and location.

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<sup>3</sup> TICAS. 2010. *After the FAFSA: How Red Tape Can Prevent Eligible Students from Receiving Financial Aid*. [http://www.ticas.org/pub\\_view.php?id=643](http://www.ticas.org/pub_view.php?id=643).

<sup>4</sup> <https://www.irs.gov/Individuals/Tax-Return-Transcript-Types-and-Ways-to-Order-Them>

<sup>5</sup> Many but not all of the comments in this document are similar to those we [submitted in October 2015](#) on the draft 2016-17 FAFSA materials, in response to the Federal Register notice posted on August 12, 2015 (FR Doc. 2015-ICCD-0101). These similarities reflect aspects of the materials that were not changed and that we still believe should be improved. Our previous comments are all available online at [www.ticas.org](http://www.ticas.org).

Because it pertains to deadlines rather than using tax return information, we recommend that the first sentence in what is currently the first paragraph of “Using Your Tax Return” (it reads, “We recommend that you complete and submit your FAFSA as soon as possible on or after October 1, 2016”) be moved and integrated into the preceding “Applying by the Deadlines” section. The first paragraph in “Applying by the Deadlines” would then begin: “For federal aid, submit your application FAFSA as early as possible, ~~but no earlier than~~ on or after October 1, 2016.”

With all these recommended revisions, the full “Using Your Tax Return” section would read as follows:

The easiest way to complete or correct your FAFSA with accurate tax information is by using the IRS Data Retrieval Tool through [www.fafsa.gov](http://www.fafsa.gov). In a few simple steps, most student and parents who filed a 2015 tax return can view and transfer their tax return information directly into their FAFSA. This form requests information from your (or your parent’s) 2015 tax filing.

If you (or your parents) have missed the 2015 tax filing deadline of April 2016, and still need to file a 2015 income tax return with the Internal Revenue Service (IRS), you should submit your FAFSA now using estimated tax information, and then you **must correct** that information **after you file** your return.

**Note:** Both parents or both the student and spouse may need to report income information on the FAFSA if they did not file a joint tax return for 2015. For assistance with answering the income information questions in this situation, call 1-800-4-FED-AID (1-800-433-3243).

#### Modify text in “Filling Out the FAFSA “

The “Filling Out the FAFSA” section on page 1 is unclear about the timing of changes in applicants’ financial situations that may merit their contacting an institution’s student financial aid office. Specifically, the current text does not make clear whether it is referring to changes that have occurred after the tax filing, or after filing the FAFSA, or financial hardships not captured in the FAFSA. We recommend the following language for the first paragraph in this section:

“If you or your family experienced significant changes to your financial situation (such as loss of employment), or other unusual circumstances (such as high unreimbursed medical or dental expenses), *since filing your 2015 taxes*, complete this form to the extent you can and submit it as instructed, then consult with the financial aid office at the college(s) you applied to or plan to attend. *You can also contact the school if such changes occur after filing the FAFSA.*”

#### **Page 2**

##### Include brief explanation of what to expect after filing

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 paper FAFSA. We continue to recommend that page 2 provide a brief explanation of what to expect after you file, so that students do not have to wait until after they have submitted the FAFSA to find out about the rest of the process. At a minimum, this information should be included for students using FOTW. This information, provided at the early stages of the process, would be especially helpful to those applying for aid for the first time. If space permits, we suggest adding the following text as a new section titled “*What happens after I file the FAFSA?*” or at the end of the current “Why fill out a FAFSA?” section: “*After submitting the FAFSA, you will receive a Student Aid Report (SAR), which summarizes the data you submitted on the FAFSA and provides information on federal aid eligibility. Later you will receive financial aid award letters*”

*from colleges to which you have applied, indicated on the FAFSA, and have been accepted. These award letters will contain more details on the aid for which you qualify.”*

The same information should also be provided on the FOTW Introduction Page, as a new link titled “What happens after I file the FAFSA?” A link to the [FAFSA Process Infographic](#), once updated (as is planned by 6/30/16 per [Federal Student Aid Resources for the 2017–18 FAFSA®](#)), would direct users to this helpful resource.

#### Rename “When will I receive the student financial aid?” section

The current text in the “When will I receive the student financial aid?” section on page 2 provides useful information, but it is not about timing as the title implies. Rather, this paragraph describes the order in which the aid is applied to costs of attendance. We recommend changing the title of this section to “How will I receive the student financial aid?” to better reflect its content.

### **Page 5**

#### Restore active duty service member and vets questions for all FOTW users (Questions 49 & 50)

We continue to urge the department adjust the “skip-logic” function in the FOTW to restore active duty service member and veteran identification questions for all students using the FOTW. Currently, applicants who are identified as independent students based on their answers to earlier questions about their dependency status (including age, degree level, and marital status) never see the active duty and veteran status questions. There is already precedent for allowing both independent and dependent applicants the opportunity to identify themselves as a type of student who would be eligible for additional aid based on a special status. This is the case for the foster youth screening question that is asked of both independent and dependent applicants in the student eligibility section of FOTW.

Allowing all service members and veterans the opportunity to identify their status when they apply for federal student aid will increase the ability of states and colleges to conduct targeted outreach to veterans and service members who may be eligible for additional aid and/or services. It would also improve the available data on federal student aid usage by veterans and service members. U.S. Senators Carper and Hirono requested the restoration of these questions for all users in a letter to Secretary Duncan on July 30, 2014. Furthermore, Veterans Education Success has requested this change in comments submitted on the 16-17 draft FAFSA<sup>6</sup> and again in their comments submitted on the current 17-18 draft FAFSA.<sup>7</sup> The questions about military background are both important and easy to answer in a matter of seconds, and as such we do not believe such questions represent a meaningful burden or are contrary to the Department’s commitment to simplify the application.

#### Simplify questions identifying unaccompanied homeless youth (Questions 56-58)

Making the questions on the paper FAFSA easier for students to understand is particularly important for those who are homeless or at risk of homelessness. Using three separate questions in the paper FAFSA to try to capture the various ways an applicant might qualify as an independent student due to being homeless or at risk of homelessness is an unnecessarily burdensome, complex, and confusing approach. The paper form should ask just one simple screening question – as FOTW already does – accompanied by a more detailed Notes section. Specifically, we continue to recommend replacing questions 56, 57, and 58 – which are long, confusing, and still do not cover all of the potential combinations of status and

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<sup>6</sup> See comment posted on regulations.gov at <http://www.regulations.gov/#!documentDetail;D=ED-2015-ICCD-0101-0046>

<sup>7</sup> See comment posted on regulations.gov at <https://www.regulations.gov/#!documentDetail;D=ED-2016-ICCD-0036-0043>

source of determination – with the following single question, which is already used as a filtering question in FOTW:

*On or after July 1, \_\_\_\_ [relevant year], were you homeless or were you self-supporting and 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 for this question would read:

Answer “Yes” if you received a determination at any time on or after July 1, [relevant year], that you were an unaccompanied youth who was homeless, or self-supporting and at risk of being homeless, from any of the following sources:

- 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 or plan to attend.

In response to our October 2014 comments,<sup>8</sup> the Department noted that it worked with a number of other agencies to develop the current three-question approach, which would generate additional information about the population of homeless students that would be useful for institutions. We appreciate this effort and intent, however, this approach does not efficiently accomplish the goal of identifying the homeless student population to begin with. Prior to collecting more granular information about this population, applicants must have sufficient clarity about whether or not they qualify as homeless for the purposes of federal financial aid (see page 7 of our comments on the current notes for questions 56-58). If the Department would like to collect information on which source can confirm the applicant’s homeless status, additional questions can be asked of applicants who first answered ‘yes’ to a simpler, single screening question.

## Page 6

### Modify instructional text before simple needs test qualifying benefits (Questions 75-79)

The updated text on page 6 before questions 75-79, and on page 8 before questions 97-101, provides instruction for students who would need to update their FAFSA if they or someone in their family receive any of the six means-tested benefits qualifying for the simplified needs test (SNT). But it does not clearly convey the window of time for changes that would require students to update their FAFSA. We also share CLASP’s concern that this text does not make clear that these questions related important benefits such as a simplified application process and an EFC that more accurately reflects a student’s true financial status.<sup>9</sup> We encourage the Department to convey these benefits in the instructional text preceding these questions.

To clarify the timing language, we recommend the text preceding questions 75-79 read as follows:

~~For 2015 or 2016,~~ *At any time during 2015 or 2016, did you, your parents, or anyone in your parents’ household (from question 73) receive benefits from any of the federal programs listed*

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<sup>8</sup> TICAS. 2014. *TICAS Comments on Draft 2015-16 FAFSA*.

[http://ticas.org/sites/default/files/pub\\_files/TICAS\\_Comments\\_on\\_2015-16\\_FAFSA\\_0.pdf](http://ticas.org/sites/default/files/pub_files/TICAS_Comments_on_2015-16_FAFSA_0.pdf)

<sup>9</sup> See comment posted on regulations.gov at <https://www.regulations.gov/#!documentDetail;D=ED-2016-ICCD-0036-0041>

*below? Mark all that apply. Answering these questions will ~~not~~ NOT reduce eligibility for student aid or these programs. TANF ~~has different names in many states~~ may have a different name in your parents' state. Call 1-800-433-3243 to find out the name of ~~the your~~ your state's program. If, ~~at the time you are completing the FAFSA,~~ you, your parents, or anyone in your parents' household ~~did NOT receive any of these benefits during 2015 or 2016,~~ but ~~do~~ receives any of them ~~these~~ benefits after filing the FAFSA on or before but before December 31, 2016, you must ~~return to the FAFSA and~~ update your response by logging into fafsa.gov and selecting "make FAFSA corrections."*

The above text, without in-line edits, reads as follows:

At any time during 2015 or 2016, did you, or your parents, or anyone in your parents' household (from question 73) receive benefits from any of the federal programs listed? Mark all that apply. Answering these questions will NOT reduce eligibility for student aid or these programs. TANF has different names in many states. Call 1-800-433-3243 to find out the name of your state's program. If you, your parents, or anyone in your household receives any of these benefits after filing the FAFSA but before December 31, 2016, you must update your response by logging into fafsa.gov and selecting "make FAFSA corrections."

Similar changes should be made on page 8 before questions 97-101:

~~For 2015 or 2016,~~ *At any time during 2015 or 2016, did you (or your spouse) or anyone in your household (from question 95) receive benefits from any of the federal programs listed? Mark all that apply. Answering these questions will ~~not~~ NOT reduce eligibility for student aid or these programs. TANF ~~may have a different name in your state~~ has different names in many states. Call 1-800-433-3243 to find out the name of ~~the your~~ your state's program. If, ~~at the time you are completing the FAFSA,~~ you (or your spouse) or anyone in your household ~~did NOT receive any of these benefits during 2015 or 2016,~~ but ~~do~~ receives any of them ~~these~~ benefits after filing the FAFSA on or before but before* December 31, 2016, you must ~~return to the FAFSA and~~ update your response by logging into fafsa.gov and selecting "make FAFSA corrections."

The above text, without in-line edits, reads as follows:

At any time during 2015 or 2016, did you (or your spouse) or anyone in your household (from question 95) receive benefits from any of the federal programs listed? Mark all that apply. Answering these questions will NOT reduce eligibility for student aid or these programs. TANF has different names in many states. Call 1-800-433-3243 to find out the name of your state's program. If you (or your spouse) or anyone in your household receives any of these benefits after filing the FAFSA but before December 31, 2016, you must update your response by logging into fafsa.gov and selecting "make FAFSA corrections."

Finally, we recommend also including on the FOTW a link to an online resource such as <http://www.acf.hhs.gov/programs/ofa/help> for identifying the name of each state's TANF program. If space permits, this hyperlink should also be included on the paper FAFSA.

## Page 10

Include link to online resources for students with parents who are unmarried and living together in "Notes for Step Four, questions 59-94 (pages 6 and 7)"

We appreciate that the Department included in the instructions on page 6 the link to the additional consumer resources it developed to help students whose parents are unmarried and living together, as we recommended in our 2016-17 comments. This user-friendly online information provides a needed alternative to phone assistance. In prior comments, we also recommended including this link on page 10 as well, in the “Notes for Step Four, questions 59-94” section. The 2017-18 draft text of this section currently only refers students to 1-800-433-3243, which is of limited use to students unable to call during the operating hours of that hotline (Monday-Friday, 8am-10pm ET). We therefore suggest that the final sentence of the second bullet in this section read: “Contact 1-800-433-3243 for assistance in completing questions 80-94, or see *StudentAid.gov/fafsa-parent*.” We believe there is enough space on the paper FAFSA for this change, and that the additional promotion of such a valuable online resource merits this change.

#### Modify notes for unaccompanied homeless youth question (Questions 56-58)

Since 2008, we have urged the Department to revise the Notes for questions 56-58 as follows to simplify the application process for homeless youth and maintain consistency with legislative intent and the definition the Government Accountability Office used in its study on disconnected youth:<sup>10</sup>

“Youth” means you are ~~21~~ 23 years of age or younger...

We appreciate the clarity that the Department provided in its July 29, 2015 Dear Colleague Letter, which states: “Applicants who are between the ages of 21 and 24 and who are unaccompanied and homeless or self-supporting and at risk of being homeless qualify for a homeless youth determination, and will be considered independent students.”<sup>11</sup> This instruction potentially mitigates an unfair loophole that previously prevented homeless and at-risk youth aged 22 and 23 from being granted independent student status. The 2016-17 Application and Verification Guide also specifies that students ages 22 and 23 who otherwise meet the criteria for unaccompanied homeless youth “qualify for a homeless youth determination.”<sup>12</sup>

Unfortunately, this clarity is obscured by the youth definition contained in both the Application and Verification Guide, and in the paper FAFSA. The Notes for questions 56-58 (page 5) on page 10 of the paper FAFSA still defines Youth as “21 years of age or younger...”. Applicants must read through the text that begins “Answer ‘no’ if you are not homeless...” to find “...you should contact your college financial aid office for assistance if you are under 24 years of age...” which adds unnecessary confusion. If colleges have already been given direction that homeless and at-risk youth ages 22 and 23 are considered independent, there is no reason to direct these students to contact their financial aid offices. Rather, applicants can be told upfront that for the purposes of answering the homelessness status question, youth means 23 years or younger. FOTW should also be adjusted to reflect this functional definition.

In responding to our prior comments on this matter, the Department has stated that “The Free Application for Federal Student Aid (FAFSA®) definition for youth is set at age 21 to be consistent with the Runaway and Homeless Youth Act.” It is our understanding that this law is not the relevant controlling legislation, and we again urge the Department to revise its age definition to ensure that 22-

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<sup>10</sup> GAO. February 2008. *Disconnected Youth: Federal Action Could Address Some of the Challenges Faced by Local Programs That Reconnect Youth to Education and Employment*. <http://www.gao.gov/new.items/d08313.pdf>.

<sup>11</sup> U.S. Department of Education. July 29, 2015. *GEN-15-16: Unaccompanied Homeless Youth Determinations*. <http://www.ifap.ed.gov/dpccletters/attachments/GEN1516Attach.pdf>.

<sup>12</sup> U.S. Department of Education, Office of Postsecondary Education. May, 2015. *2016-2017 Federal Student Aid Handbook Errata and Updates*, available at <http://ifap.ed.gov/fsahandbook/attachments/1617AVG.pdf>.

and 23-year old students in need do not face unnecessary barriers to receiving the aid for which they may be eligible.

### **FAFSA Submission Page**

We commend the Department for improving the information on the confirmation screen seen by applicants who answer ‘yes’ to the foster youth screening question. However, the additional information about potential added grant assistance for current and former foster youth is not as prominently displayed as Pell Grants and loans. We recommend underlining or bolding the text “You may be eligible for assistance through federal programs for foster youth” or including it in the bulleted list in order to make sure students don’t overlook this important information.

### **IRS Data Retrieval Tool (DRT)**

#### Add explanation of DRT ineligible determination on FOTW

We appreciate that the Department updated the FOTW to include a statement to help students determine if they are eligible to use the IRS DRT. Unfortunately, users who are told they cannot use the DRT are given no additional information as to why they are ineligible or what they can do to possibly become eligible in the future. We therefore urge the Department to ensure users ineligible to use the DRT are also told *why*, and that they can return and try again, and approximately how soon, when appropriate.

#### Explore expanding the use of the DRT

We encourage the Departments to continue to work with the IRS to explore extending access to the IRS Data Retrieval Tool (DRT) to more applicants and potential applicants, including by expanding the categories of tax filers who can use the DRT, and also expanding the number of forms whose data can be imported into the FAFSA.

As detailed in our [February 2015 memo](#), and in our [comments on the draft 2015-16 FAFSA](#), certain types of tax filers cannot use the DRT to transfer tax data to their FAFSAs due to their tax filing status. These include tax filers who are married but file separate tax returns, those who file as head of household, parents who are unmarried and living together, those who file amended tax returns, those who file Puerto Rican or foreign tax returns, and those who changed marital status since Dec 31 of the prior year. We continue to recommend the Department and IRS consider making the DRT available to some or all of these categories of filers, and whether the use of prior-prior tax year data starting in 2017-18 will make it easier to add certain categories, i.e., if some filers are currently excluded due to longer processing times for their particular type of return.

The DRT currently draws data only from 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. The use of prior-prior year tax data could provide new opportunities for users to import additional tax data, such as from the W-2 and 1099 forms, which can take longer for the IRS to process than 1040 data.

#### Explore ways to integrate DRT into the FAFSA4caster

We continue to encourage the Department to consider how the DRT could be integrated into the FAFSA4caster so that the user has the option of a more precise aid estimate, in addition to the current format. While the FAFSA4caster does not currently collect personally identifiable information, users

could have the option to provide their IRS data or to use the current process, and the DRT would not have to retain any of the information shared. 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 DRT well before they begin the FAFSA application itself.

### **Comment Process**

We continue to urge the Department to release draft FOTW materials at the same time as the draft paper FAFSA and to encourage public review of the FOTW 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. We continue to recommend that the Department provide at least screenshots, if not a demo site, for future planned enhancements to FOTW, including the IRS DRT features, to facilitate public input before they are finalized. Including DRT-related messages and screenshots in the FAFSA Application Enhancements Summary that it issues during the annual comment period would allow commenters to review and provide input on this important tool.

We understand that updating FOTW is a substantial undertaking. Per the [Federal Student Aid Resources for the 2017–18 FAFSA®](#) the 17-18 FOTW Preview Presentation will not be available until 9/15/16. Given that the FOTW is the “primary entry point for tens of millions of students who apply for Federal, State, and institutional financial aid” with more than 99% of FAFSAs expected to be filed online,<sup>13</sup> we continue to urge the Department to make a preview version of FOTW available during the public comment period, to provide stakeholders the opportunity to weigh in on proposed changes and suggest improvements. Some information about FOTW is available in the “Data Elements and Justification” chart, but these textual descriptions of aspects of the online application are of limited use without an accompanying visual depiction of how applicants work their way through the process. Moreover, they do not provide the text used to determine IRS Data Retrieval Tool eligibility or the responses received by applicants. Instead, a dynamic Data Elements Justification chart could include links to static images with the actual text that applicants receive.

Thank you for the opportunity to comment on the proposed 2017-18 Federal Student Aid application materials. If you have any questions or concerns regarding our comments, please feel free 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

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<sup>13</sup> See pages 4, 10 and 11 of “Supporting Statement for Paperwork Reduction Act Submission”