

# nassgap

national association of state student grant and aid programs

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June 30, 2005

Mr. Joe Schubart, via e-mail  
U.S. Department of Education  
FAFSAComments@ed.gov

Dear Mr. Schubart:

On behalf of the National Association of State Student Grant and Aid Programs (NASSGAP), we are responding to the request for comments on the 2006-07 Free Application for Federal Student Aid (FAFSA), which appeared in the June 8, 2005 Federal Register (Volume 70, Number 109). Thank you for the opportunity to comment on this data collection form that is used for state, federal and school purposes.

NASSGAP represents agencies in the 50 states that operate Leveraging Educational Assistance Partnership Programs (LEAP/SLEAP) and state aid programs. The states, including the District of Columbia and Puerto Rico, provide over \$7 billion in aid to more than 3,500,000 students. States are central to the delivery of financial aid to all categories of students, distributing not only federal LEAP/SLEAP funds, but also administering a significant number of state aid programs. States use the FAFSA as the foundation application for state assistance and are properly interested in the development of this document.

Outlined below are comments relative to the 2006-07 FAFSA:

## Page 3:

- Delete question 31.

## Page 5:

- In questions 65, 66, 84 and 85: Add the words "...and enter that number here" to make this requirement more clear. Alternatively, add this wording to the notes for these questions.

## Page 6:

- Step Six: Place the following sentence in **bold font**. "For state aid, you may wish to list your preferred school first."
- Delete questions 101 - 103.

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**Page 7:**

- Notes for question 65: Eliminate clause b in the second bullet, which allows parents to count children they do not support and who are not planning to enroll in postsecondary education. These children are not drawing on the family's resources and should not increase the applicant's eligibility for aid due to their inclusion in the household size.

The NASSGAP membership also suggests that the reinstatement or addition of the following questions be strongly considered. These are data elements that impact a significant number of applicants to state aid programs and should be added to the form.

- Require that both value and debt be reported for all assets to increase data integrity.
- Place questions requiring the submission of TANF and payments to tax deferred accounts on the FAFSA application (not on the worksheets). TANF payments are used as an indicator for exceptionally needy students and identification of this cohort at time of application permits consideration for appropriate aid and support services. Tax deferred income can be a significant resource for the family which is often overlooked when completing the FAFSA and efforts should be made to increase the integrity of the data used when determining eligibility for federal and state aid funds.

NASSGAP appreciates the opportunity to interact with regard to this very important process and document and strongly supports a streamlined process that does not negatively impact applicants for financial aid. For many years, NASSGAP has had a representative on the Department's FAFSA design team, which has ensured that the diverse needs of the states are considered prior to implementing any changes. In light of the dramatic increase in the use of FOTW, NASSGAP feels it would be advantageous to include members on the Department's FOTW work group and has made this recommendation to Department staff. Such participation would facilitate the development of a "smarter" on-line FAFSA that would be tailored to individual state's needs, such as capturing data from the worksheets, displaying the state's filing deadline when state of legal residence is entered and the like. A linkage could also be established from FOTW to a state based application to further expand the use of on-line capabilities. NASSGAP looks forward to working with the Department to develop these and other ideas to enhance FOTW.

The relationship between NASSGAP and the Department, reflective of the state/federal partnership, has been fostered by the continued inclusion of a NASSGAP representative on the core federal FAFSA design team. NASSGAP urges that this continue and that consultation between the states and U.S. Department of Education (USDE) occur on all joint concerns and issues.

Sincerely,

Mary Beth Kelly          Sherry Fox  
Co-Chairs  
NASSGAP ED Technical Forms Committee

MBK/dmh

cc: Ms. Theresa Antworth  
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