

**To: Tech Form Colleagues (email)**  
**From: Dennis Obergfell**  
**RE: EFC/PC for unsigned SARS**  
**Date: 6/1/05**

Since the 2003 fall NASSGAP conference and at each subsequent meeting, I've asked Bill Leith if the Department could allow the CPS to compute PCs/EFCs for unsigned FAFSAs. His response was always, "we'll see what we can do next year". My reasons for wanting this information are at the bottom of this email. In short, I was just told (see below) that it won't happen until the Feds transition to their new system (ADvance), meaning NO change for the 2006-07 academic year (see series of email exchanges below). The decision not to do it for 2006-07 comes down to money.

While I'm grateful the Department both considered and supports the change, I'm obviously disappointed in the delay even though I understand the Department's dilemma. I don't want this to fall off the radar and take for granted that someday it will happen.

Take care,

Dennis Obergfell  
Indiana

-----Original Message-----

**From:** O'Flaherty, Sue [mailto:Sue.O'Flaherty@ed.gov]  
**Sent:** Thursday, May 26, 2005 2:04 PM  
**To:** Obergfell, Dennis  
**Cc:** Leith, William  
**Subject:** RE: Indiana questions EFCs/unsigned FAFSA/SAR 5/20

Dennis:

In terms of your request, we had your item on the 06-07 requirements tracking system for review/discussion during our 06-07 requirement setting process. This was a tough issue for us. Overall, we agree with making the change - it is more a matter of when. With our current system, it is a complicated change that will require significant work on the part of our contractor. The problem is right now, we simply can't do it. You probably know that we are in the middle of a major transition to a new system (ADvance) and all of our energy and time, and more important the energy and time of our contractor, is focused on getting the new system up. If it was a simple coding change, then I believe it would have been accomodated. Unfortunately, right now, I think our legacy system is just old enough that even what appears to be a simple change is complicated and would result in a significant workload.

I have verified that it is on the requirements list for the new system. At this point, I can't yet tell you when this functionality will be available, but please know it will be reviewed as we proceed with the requirments for ADvance. It is a logical request and one that I think will be a huge benefit to students, especially low income students.

Bill and I discussed whether or not there was anything else that we could do or that we could provide to help make your particular issue less stressful until we are able to incorporate this functionality into the new system. If you have ideas or thoughts that you would like me to explore, please let me know.

Again, I apologize for the lateness in my response. I truly wish we could have completed this request for 06-07. I will continue to track it as we proceed with ADvance. Please know, that

when this is actually closer to a reality, you will be the first person I call! In the meantime, feel free to contact me on the status at any time.

THANKS,

Sue O'Flaherty

-----Original Message-----

**From:** O'Flaherty, Sue [mailto:Sue.O'Flaherty@ed.gov]  
**Sent:** Wednesday, May 25, 2005 4:02 PM  
**To:** Obergfell, Dennis  
**Subject:** RE: Indiana questions EFCs/unsigned FAFSA/SAR 5/20

Dennis,

Yes, but first, I must apologize. After we last communicated, I think it was a Friday, I went home to Michigan and my mom took ill and passed away. Today is my first day back and I must admit, as I read my hundreds of emails, I am embarrassed that I let so much drop! I will double check on this issue and will get right back to you. I am so sorry I didn't follow up and really appreciate your patience!

-----Original Message-----

**From:** Obergfell, Dennis [mailto:dobergfell@ssaci.IN.gov]  
**Sent:** Friday, May 20, 2005 1:09 PM  
**To:** O'Flaherty, Sue  
**Subject:** FW: Indiana questions EFCs/unsigned FAFSA/SAR 5/20

Sue:

Can you tell me what has been decided or give me some (any) kind of update?

Dennis Obergfell  
Indiana

-----Original Message-----

**From:** Obergfell, Dennis  
**Sent:** Tuesday, May 10, 2005 9:18 AM  
**To:** 'O'Flaherty, Sue'  
**Subject:** RE: Indiana questions EFCs/unsigned FAFSA/SAR

Sue:

Can you tell me what was decided ("I can give you a firm answer by Monday")?

Thanks much,

Dennis Obergfell  
State Student Assistance Commission of Indiana

-----Original Message-----

**From:** O'Flaherty, Sue [mailto:Sue.O'Flaherty@ed.gov]  
**Sent:** Friday, May 06, 2005 6:23 AM  
**To:** Obergfell, Dennis  
**Subject:** RE: Indiana questions EFCs/unsigned FAFSA/SAR

Dennis,

Your timing is great. We are just finishing up with finalizing our 06-07 requirements. The process has been going on since March. I don't mean to put you off but I can give you a firm answer by Monday (maybe even later today). Final approvals are in the works now.

[O'Flaherty, Sue] -----Original Message-----

**From:** Obergfell, Dennis [mailto:dobergfell@ssaci.IN.gov]

**Sent:** Thursday, May 05, 2005 4:10 PM

**To:** O'Flaherty, Sue

**Subject:** Indiana questions EFCs/unsigned FAFSA/SAR

Good afternoon Sue:

This is a follow-up to our exchange of emails and our phone conversation last November on the possibility of generating EFC/PCs for unsigned FAFSAs/SARs (as outlined below). In short, I'm interested in knowing if this change is still a candidate to make it into the 05-06 final processing requirements. Needless to say, I hope it is still on the table and will be adopted. I'd appreciate any update that you could give me.

Thanks much,

Dennis Obergfell

State Student Assistance Commission of Indiana

317-232-2097

-----Original Message-----

**From:** O'Flaherty, Sue [mailto:Sue.O'Flaherty@ed.gov]

**Sent:** Friday, January 21, 2005 9:45 AM

**To:** Obergfell, Dennis; Adams, Larry

**Cc:** Leith, William

**Subject:** RE: Indiana questions

Dennis,

I have copied Bill Leith in case further information or clarification is needed.

When this came up at your conference this fall with Bill, it was already too late to get a change made for 05-06. When you and I spoke in November, we were seriously into acceptance testing for the 05-06 system. We have been looking at this as an 06-07 system change.

The first step to being able to consider the proposal, even before evaluating system changes, was to determine if there was a policy issue that would keep us from allowing the EFC to be calculated prior to having signatures. Bill and I had numerous discussions with policy on this. Besides other issues that needed to be researched, they were mostly concerned about us being able to send data to the various match systems without a signature. Policy determined and notified us in December that we probably could calculate an EFC without a signature as long as the signature was received prior to disbursement.

Although we think this change would not require huge changes to the system, there are some. We also think it will require changes to the Common Origination and Disbursement (COD) system since we will have to have an edit for the signature built in to that system. A full evaluation on the system changes has not been done yet. During the time period that this was being evaluated by policy, 100% focus was on the 05-06 testing and preparation for go-live.

The proposed change is on our requirements list for the next cycle and as we prepare for the new cycle, we will have a better handle on what system changes will be needed to accomodate this change.

Please know that Bill and I support this change and we are both happy that policy was able to reach a favorable decision. As anxious as we are to move forward with Advisory Committee issues and good recommendations like this one, we are still tied to a pretty strict system cycle.

This is probably not the explanation or decision you were looking for! I apologize for that. I will be happy to try to answer any other questions you have on this.

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**Below is a shorter version of an email I (Dennis O) sent to Sue O'Flaherty, Bill Leith, Larry Adams (CPS) and Brian Fitzgerald in November 2004**

**The issue is that the state of Indiana would like the CPS to supply us with EFCs/PCs for applicants who have applications on file but who did not completely signed their FAFSAs. Currently the CPS gives states and schools all FAFSA/SAR data for such students with the exception of the PCs/EFCs. Indiana uses PCs/EFCs to calculate awards for state grants thus it cannot calculate state grant awards for students without PCs/EFCs. The obvious negative consequences to not having signed FAFSAs/SARs on file by the time Indiana issues awards to students is that students with unsigned FAFSAs/SARs are denied state aid.**

**If the CPS provided Indiana with PCs/EFCs for these students, then Indiana would be in a position to offer them provisional awards. Indiana would still require students to have signed applications/SARs on file before schools could disburse funds to them, but without PCs/EFCs we cannot make awards, provisional or otherwise, because we rely on the computed federal methodology numbers to disburse state grants.**

**It is important to note that every year Indiana sends thousands of letters to students with "problem" FAFSAs telling them that their applications have errors (we're as specific as possible, for example if a student did not sign their FAFSA the letter would tell them "You did not sign your FAFSA". For the 2004-05 academic year Indiana sent "edit" letters in bulk in mid-April (Indiana has a March 10, date-received filing deadline) and applicants were given until June 1, 2004 to "correct" or in this case "sign" their applications.**

**On April 16, 2004 Indiana sent 10,613 letters to students who filed 2004-05 FAFSAs by our March 10, 2004 received-by deadline but who also had missing signatures. Over 9,000 of these students were online filers, the rest were paper-filers. Eventually 6,000 students corrected their unsigned FAFSAs by Indiana's June 1, 2004 "correction" deadline but obviously the other 4,000 plus did not. If Indiana had received the EFCs/PCs for this category of unsigned FAFSA students then the state could have saved a significant amount of money in postage and mailing-related costs and more importantly, all of these students would have at least been considered for state aid. Too, unsigned SARs also result in no PCs/EFCs being generated thus no state awards are calculated.**

**In summary, giving states and schools PCs/EFCs for students with missing signatures would allow all parties to at a minimum package provisional aid awards to students earlier. The beauty of this change is that it would not take an act of Congress to implement and would have an immediate and positive impact for students and families. I want to be clear, I am not asking the CPS to make students needing signatures eligible for Title IV aid, I am only asking that states and schools be given PCs/EFCs for students who have filed FAFSAs and who have missing signature edits.**

**Dennis Oberfell  
State Student Assistance Commission of Indiana.**