

nassgap

national association of state student grant and aid programs
www.nassgap.org

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Via Electronic Delivery

FAFSA.Comments@ed.gov

And: Michele Brown
U.S. Department of Education
830 First St., N.E.
Washington, DC 20202

Dear Michele:

Thank you for providing an opportunity for the National Association of State Student Grant and Aid Programs (NASSGAP) to review and comment on the proposed draft of the 2010-2011 Free Application for Federal Student Aid (FAFSA), as published in the *Federal Register* notice on September 4, 2009. NASSGAP is also providing comments on the proposed changes to the FAFSA on the Web (FOTW) as described in supplemental documents available on the USDE (Department) web site as we were encouraged to do by Mr. Shireman.

NASSGAP membership is drawn from single agencies from each state or territory that are responsible for state-funded student aid programs. NASSGAP is dedicated to the promotion, strengthening, encouragement and enhancement of high standards in the administration and operation of student grant and aid programs so that these programs will be available to students across our nation. These programs are vital to our shared goal of increasing student participation and completion of postsecondary education.

NASSGAP looks forward to a continued partnership with the Department to assist students by further streamlining the application process for both federal and state student aid. Almost all of the states and territories administer student grant programs to our nation's most underserved students and NASSGAP is hopeful that the FAFSA (paper and electronic) can continue to be used as the primary application for both federal and state student aid.

NASSGAP is concerned that if specific questions required by various state agencies to determine eligibility for state grant programs are eliminated from the FAFSA or FOTW, some states may find it necessary to develop supplemental state grant applications. This bifurcated application process could confuse students and parents. As a result, some students may not complete the required state application and not receive state aid. NASSGAP is a strong proponent of offering all states the opportunity to either have a limited amount of the information

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embedded in the FOTW and subsequently transmitted as part of the ISIR record or, if more robust data are required, to seamlessly link their websites to FOTW in one online session. We believe that these two options would not be burdensome to applicants and enable the collection of data required to administer state-funded student financial aid programs.

It is unclear how changes in the draft 2010-11 FAFSA and future FAFSAs including FOTW will deal with matters such as assets. However, to the extent possible a single application form will keep the process simple for the students in those states where it can be accommodated while also protecting state resources from being diverted from student grants to increased administrative costs. However, where state law and policies require a more robust application, the Department's June 2009 announcement that it would permit states to link their websites to FOTW for the 2010-2011 academic year was welcome news. NASSGAP looks forward to working closely with the Department to ensure that the required support is made available to interested states so these links or embedded questions can be operational as soon as possible after January 1, 2010.

While we move toward linking state websites to FOTW, NASSGAP offers the following comments that reflect its desire to ensure that the FOTW experience is as user-friendly as possible for students and parents while continuing to collect data required for the administration of state-funded student financial aid programs. NASSGAP recognizes that the Department and institutions are also interested in the development of the most effective and efficient administration of the financial aid process. As noted above, we look forward to working together to further reduce the number of questions on the FAFSA as state links and embedded FAFSA questions to FOTW become operational. In the interim, we offer the following comments on the FOTW and the proposed skip logic.

- For FOTW, we recommend that the bulleted link to "[Check Application Deadline Dates](#)" be listed as the first link rather than the last.
- As directed under the statute, state questions should continue to be included in the FAFSA including the **direct question concerning the applicant's state of legal residence** for purposes of transmitting the FAFSA data to the state where the applicant is most likely to have eligibility for a state need based grant. The legal residency of the both student **and** parent are critical and a direct question to collect the parent's state of legal residence for dependent applicants is needed to comply with some states' residency requirements. The Department's proposal to use the number of years an applicant or parents have lived at their current address is not sufficient to establish their state of legal residency. For example, students who live near state borders many times have an address indicating one state when in fact they are residents of another, military families can reside years in one state without establishing "legal residency" (or domicile) in that state, and many students take in excess of four years to complete their education. In addition, the driver's license information is valuable in helping to identify discrepancies with residency.
- If changes are made to the EFC data elements, including the elimination of some income and asset information, states should be allowed to ask the questions they need to award state need based aid (i.e. HR 3221 Sec 122 reduces asset collection to \$150k or more, applicant not eligible for need based federal aid; Sec 123, Social Security Allowance for two earner family changed; Sec. 124 Untaxed income is only that which can be gotten from IRS return so IRA/SEP IRA contributions used by 401K/403B is not). We recognize that the goal of simplifying the FAFSA should not be lost by the data needs of the states. Accordingly, NASSGAP is prepared to discuss how to best address the state's concerns after the Department presents its ideas on how the questions and directions need to be designed for the federal programs.

- Enrollment information is also needed by states as state awards may be limited or targeted to specific enrollment levels. By not having this information, state agencies could be forced to request additional information from the student to determine their awards.
- Question 26 on the paper FAFSA limits the applicant to choose only one of the answers. There is at least one state that encourages homeschooled students to also obtain a GED. In that scenario it may be confusing for the applicant to decide which option to select. The GAP program is limited to students who actually completed high school or were home schooled. Students with GED or ATB are not GAP eligible.

Thank you for the opportunity to comment on the draft 2010-2011 FAFSA. If you have any questions or concerns regarding these comments, please feel free to contact Sherry Fox at (609) 588-3268 or sfox@hesaa.org, or Maureen Laffey at (302) 577-5240, or mlaffey@doe.k12.de.us.

Sincerely,

Lois Hollis
NASSGAP President

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 Senator Tom Harkin, Chair, Committee on Health, Education, Labor, and Pensions
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