



National Association of State Student Grant & Aid Programs

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November 22, 2021

Richard Cordray
Chief Operating Officer
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U.S. Department of Education
830 First Street, NE
Washington, D.C. 20002

Dear Mr. Cordray:

Thank you again for speaking with us at the NASSGAP conference last month. We appreciated being recognized as an important partner of FSA and we thank you for your comments about admiring the work of NASSGAP members on the “front lines” of student outreach and FAFSA completion. We’re also taking this opportunity to accept your invitation to reach out and identify areas where we can work together going forward. There are a couple of topics we would like to bring to your attention.

FAFSA Platform Issues

The most immediate concern we have is the performance of the FAFSA platform in this current FAFSA cycle. As you are aware, there have been widespread instances of students and parents attempting to complete the FAFSA but encountering slow response times, frozen screens, inaccurate messages that the site is down, and logouts, among other issues. We are happy to work with FSA on identifying and addressing these issues, but would appreciate guidance on a couple of points:

- Is there a single point person we should be using to report issues? Our members and other college access professionals are often pointed to different folks.
- We are aware that the IT infrastructure at ED is not entirely up to date, an issue many of us encounter in our states as well. We don’t know if the infrastructure is the cause of some/all of the glitches encountered - we’re hearing ‘patches’ are being installed, which sounds like a programming fix, not an infrastructure issue. If FSA’s diagnosis is that the infrastructure is the problem and it can’t be fixed in the near term, we need to consider a “Plan B.”
- At FAFSA completion events, we have had parents (and students) re-enter data multiple times, encounter errors or logouts, find the data not saved and walk out in exasperation, perhaps never to come back and complete the FAFSA. We are aware that FSA sends out a message that says, “you started a FAFSA but didn’t submit it”. We think an extra step could be to share the ‘started but not submitted’ contact information with any State Agency that requests it to allow agencies with the resources and/or college access/outreach partners to reach out to those families and get them back on the FAFSA track.



FAFSA Simplification

Further down the road, we look forward to working with you and the FSA team on completing the implementation of the FAFSA Simplification Act. Much like we did during the Obama Administration for the implementation of “prior-prior year”, we look forward to participating in a task force or working group to identify and resolve implementation challenges. Congress is very much aware of the challenges of integrating the federal and state financial aid processes and quickly agreed to modify the original language of the Act, as drafted in 2019, to reflect that most states use the term “EFC” in statute but opening the statute to amendment could have unintended consequences or result in changes that do not benefit students. Here is the language from p. 5141 of the bill:

“GUIDANCE TO STATES. —The Secretary of Education shall issue guidance for States on interpretation and implementation of the terminology and formula adjustments made to the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.) under the amendments by this Act, including the student aid index, formerly known as the expected family contribution, and the need analysis formulas.”

We look forward to working with you and the team at the Department to identify how best to move forward on this issue, as well as the impact of questions that will be eliminated from the FAFSA but may still be required by state law for state aid programs. While we acknowledge your comment that states have plenty of time to amend their statutes, some amendments may not be student friendly. We would also like to avoid the situation where a state might create its own application to gather additional required data.

We are aware that FSA will need to get Congress to amend the Act to postpone the implementation requirement for a year. In some ways, there is a silver lining to this delay as it may give us time to identify – and fix via technical amendment – potential unintended consequences of the new need formula. As you are aware, NASSGAP members from Iowa and Illinois have formed a team to model out changes from the old EFC formula to the new SAI formula. This effort identified a potential situation where a dependent student from a low-income family who works to help their family put food on the table appears to be penalized by the new formula and ends up getting a Pell grant similar to what a dependent student from a middle- upper income family who doesn’t work might get. We’ve asked ED for confirmation of whether they agree with our analysis, but it might make sense for FSA to test the universe of aid cases more thoroughly by calculating the SAI for all of last year’s FAFSAs and comparing to the EFC to identify other potentially disadvantaged students who might be adversely impacted by the new formula.

We have additional areas where we would like to collaborate but think it might be best to start with these high priority items. We know the team at FSA is incredibly busy, so we are looking to focus on and prioritize those issues where we can deliver the services students need to pursue their postsecondary education regardless of their family’s economic situation. Please let us know if there are additional areas where you would like to work with NASSGAP’s members or if we can provide further information related to the FAFSA platform issues our members have shared.

Respectfully,

Katie Harrison, President
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