



Richard Cordray
Chief Operating Officer
Federal Student Aid
Department of Education Building
400 Maryland Ave, SW
Washington, DC 20202

March 13, 2023

Dear COO Cordray,

We write on behalf of eight national organizations representing college counselors, state administrators, institutions, admission officials, financial aid administrators, registrars, scholarship providers, advocates and others working directly with students to access financial aid. We appreciate the hard work of the staff at Federal Student Aid (FSA) in developing the Better FAFSA and look forward to its release. The new process will increase the number of students who are eligible to receive a Pell Grant, make awards more predictable, and reduce the need for verification, which disproportionately impacts students from low-income families. We have been eagerly anticipating these changes since they were enacted into law, and we are pleased to partner with you to see them come to fruition for the benefit of students everywhere.

We understand, based on recent public comments by FSA officials, that the release of the '24/'25 FAFSA form may be delayed beyond October 1, the traditional launch date, and instead go live sometime in Q4, which extends to December 31 of 2023. We write to offer recommendations to mitigate potential harm to students in the event of a delayed launch.

Because the formula and process for applying for federal student aid is changing significantly, we anticipate that students and those who support students in completing the FAFSA will have a lot of questions about the process. A delayed release date could compound that confusion and result in a decline in applicants for federal student aid. We want to work with you to avoid that scenario. We stand ready to communicate key information and demystify the new process among students and families. The tools, resources, and actions listed below will make it possible for us to prepare the field, align key

stakeholders, and prepare students to be ready as soon as the form is. We recommend that you take the following actions:

1. **Commit to a specific FAFSA release date by May 1, 2023** – States, institutions and college access organizations must prepare to make significant adjustments to their systems and processes based on the FAFSA release date. Many states will have to change their deadlines for applying for state financial aid. States that require students to complete the FAFSA in order to graduate from high school will need to adjust their plans, since many work with their students in the fall to meet this requirement. Overall, a lot of decisions and plans flow from the release date, and we implore you to announce a firm date for release by May 1, 2023.
2. **Release a Pell lookup table by May 1, 2023** – The new formula for determining Pell Grant eligibility and the size of one’s award will be more transparent and predictable than it is under the current formula. As a result, FSA can create a table showing the thresholds for receiving a minimum or maximum Pell Grant based on household size and family income that students, families, and counselors could consult to get an early indication of how much assistance they will likely receive. Such a table would help applicants understand the postsecondary educational options that may be available to them, even if they are not able to see their Student Aid Report, which will not be available until they have completed the FAFSA. Research shows that early awareness of financial aid increases postsecondary enrollment. We urge you to release this table as soon as possible and not later than May 1, 2023 so that it can be used in college advising workshops and counseling sessions throughout the summer and fall.
3. **Send the technical specifications to state agencies, vendors involved in coding state, college, and university systems, and Financial Aid Management Systems (FAMS) vendors at least 8 months in advance of the FAFSA release** – State agencies responsible for updating their systems to align state financial aid with the new federal process need ample time to make the significant changes that the new federal process dictates. Otherwise, states may not be able to determine students’ eligibility for state financial aid or align supplemental applications, such as those for students who are undocumented, with the Better FAFSA. Furthermore, colleges and universities employ vendor-supported software to process federal and state financial aid; a delay in providing technical specifications to these vendors, colleges, and universities could result in delays issuing financial aid offers to newly admitted students. Feedback from state leaders involved in similar transitions to new systems believe it will take 6 to 8 months to update the code and ensure that state systems are working properly. Communicating only with large vendors will not be adequate because many states code their own systems.
4. **Launch a communications plan about the FAFSA delay with messages for students, parents, counselors, institutions, states and other stakeholders by July 1, 2023** – If the FAFSA is delayed, it will be critical for FSA to take proactive steps to stem confusion in the field to the greatest degree possible. We recommend that FSA deliver clear and simple messages for all impacted stakeholders, especially students and families, about what the delay does and doesn’t mean for their financial aid. FSA should email those messages to every student who is a prior FAFSA filer and share the emails with other stakeholders for reference. These messages should inform students that the delay is a one-time event, that the form will be released on October 1st in future years, and that the delay will not affect their eligibility for federal student aid. FSA should also make clear that students will have ample time to complete the form, and that the new formula will mean that a larger population of students will be eligible to receive a maximum Pell

Grant (currently of \$7,395). FSA should send similar messages, including email templates and social media tools, to college access organizations, high school counselors and other organizations working with students who have not previously filed the FAFSA so they can share them with the students they serve. The Department itself should run a social media campaign with key messages about the delay to help reach as many stakeholders as possible. FSA should also contact state financial aid agencies and SHEEOs to encourage them to push back their state financial aid deadlines and consider the need to adjust plans if they have universal FAFSA graduation requirements in place. By developing and deploying a clear and compelling communication plan for all impacted stakeholders, including special populations who have historically faced barriers to FAFSA completion, such as students experiencing homelessness and foster youth, FSA will help preempt confusion and keep students on track for enrolling in postsecondary education.

5. **Produce training materials, including screen shots and details on the parent wizard, by July 1, 2023** – Counselors and other student-facing professionals will play an especially important role in supporting students to FAFSA completion if they themselves have internalized the new process. Because the process is changing so significantly, trainers will need more time than usual to prepare. We urge you to release all training materials by July 1, 2023, to provide enough time for trainers to understand the system and teach counselors about the changes. Special populations, such as students who are homeless, have questions about how the parent wizard will work. Counselors will probably need 3 or 4 training sessions before they feel comfortable supporting students, and summer is a key window during which many FAFSA training sessions occur.

6. **Implement the new process for obtaining an FSA ID by July 1, 2023** – The new process for completing the FAFSA will require everyone who applies for federal student aid or contributes to an application to obtain an FSA ID, and obtaining an FSA ID will require verifying one's identity. This process can happen in advance of filling out the FAFSA, and our organizations will encourage students and their parents/guardians to act early so that when the form launches, they have their FSA ID in hand and are ready to complete and submit the form. The sooner the process for obtaining an FSA ID can be updated, the better. To allow all contributors to obtain an FSA ID, FSA will also have to finalize a process for allowing students whose parents are undocumented, foreign residents, or otherwise do not have a social security number to get an FSA ID. We urge you to finalize and publicize the process as soon as possible and not later than July 1, 2023, so that all students can be ready on day one of the FAFSA release.

Thank you again for all your hard work in developing the Better FAFSA. Our organizations look forward to partnering with you to do all we can to ensure the rollout is a success.

Sincerely,

American Association of Collegiate Registrars and Admissions Officers (AACRAO)
Illinois Student Assistance Corporation (ISAC)
National Association of State Student Grant & Aid Programs (NASSGAP)
National Association of Student Financial Aid Administrators (NASFAA)
National College Attainment Network (NCAN)
National Council for Community and Education Partnerships (NCCEP)

SchoolHouse Connection
State Higher Education Executive Officers Association (SHEEO)

Cc:

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