



December 12, 2023

The Honorable Miguel Cardona
Secretary of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

James Kvaal
Under Secretary of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Richard Cordray
Chief Operating Officer
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Secretary Cardona, Under Secretary Kvaal, and Mr. Cordray,

On behalf of the National Association of Student Financial Aid Administrators (NASFAA), we write today to ask the Department of Education (ED) to reduce administrative burden on financial aid administrators during this final implementation phase of the FAFSA Simplification Act, particularly in light of ED's recent announcements that have truncated financial aid and enrollment decision timelines due to the delayed release of ISIRs into the month of January.

NASFAA's membership consists of more than 29,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every 10 undergraduates in the United States.

Although financial aid administrators have been preparing for more than two years for the massive changes to the federal student aid application system, student eligibility requirements, eligibility formula, and more, the delayed release of the FAFSA this year from early October to late December imposes a compressed time frame during which they can help applicants navigate the process and make financial aid offers.

ED's recently announced one-month [delay](#) in ISIR transmissions to postsecondary institutions adds yet more pressure to an already stressed system and leaves financial aid administrators with four full months' less time than in years past to make financial aid decisions, evaluate special circumstances, provide personalized counseling, process financial aid appeals, submit FAFSA corrections, and conduct professional judgment.

Financial aid administrators must be able to direct their energies to the job of ensuring equitable access to postsecondary education during this time of great change. To do that, we need relief

from the other activities that direct their limited time and resources away from what matters most: college access and success.

To that end we ask that ED:

- **Communicate realistic time frames and next steps to students.** ED must include in its communications with applicants when they submit the FAFSA that, while their FAFSA submission was successful, institutions may not have this information until the end of January. As institutions gear up to begin importing ISIRs and making financial aid offers, they cannot afford to spare already limited and overworked staff to answer questions from applicants about why their FAFSA data hasn't reached the school. Communications from ED should include clear next steps and realistic timelines of when institutions will receive applicant data. We are heartened that ED has signaled its willingness to work with NASFAA and others to work on this language and stand ready to assist.
- **Increase availability of customer support to students and financial aid offices.** Students and families will undoubtedly have questions as they navigate this new application process for the first time, including but not limited to the new definition of family size, changes to who is considered the parent of record, and getting an FSA ID for individuals without a Social Security number. Financial aid administrators still have many unanswered questions as well, and the more they know, the more they can disseminate information and lighten the load on the Federal Student Aid Information Center. ED should add weekend hours, extend weeknight hours to at least 8 p.m. Eastern time, and ensure at least one weekday includes evening hours for applicants in the Western timezones.
- **Lower verification selection rates across the board.** Verification is tedious and burdensome for students and financial aid administrators alike, even in the best of times. It will be even more so during this compressed time frame to make financial aid offers. The new direct data exchange between the IRS and ED will ensure income data is accurate, greatly reducing the need for verification. This means ED can keep verification selection rates as low as possible without sacrificing program integrity.
- **Permit schools to accept electronic copies of verification materials, including electronic signatures.** During the COVID-19 pandemic, ED allowed applicants in the V4 and V5 verification categories to submit an e-signature for the statement of educational purpose. Provided ED does not have evidence that this waiver led to an increase in fraudulent activity, ED should reinstate that waiver this year to speed up the verification process given the short time frame applicants will have to complete verification requirements and still receive a financial aid offer in time to make an

informed decision about where to attend college.

- **Pause standard program reviews and other non-urgent oversight activities, except in instances of suspected fraud or known abuses through peak processing season.** We understand the important role of oversight in protecting taxpayer dollars in the federal student aid programs, but committing resources to finding problems there is no indication even exist is not a prudent use of ED's or institutions' time during this transition.
- **Delay institutional Gainful Employment (GE) and financial value transparency reporting deadlines, without delaying accountability deadlines.** Institutions are required to report data by July 1, 2024, yet ED will not publish data or require student warnings or acknowledgments for GE and financial value transparency until July 1, 2026. Giving institutions more time to complete this reporting will have no negative impact on students and families in terms of institutional accountability or transparency, but will certainly benefit them by having financial aid administrators focused in these upcoming months on getting their financial aid in order. ED could still open the reporting process per its planned schedule to allow institutions the option of reporting by July 1, 2024.

We stand with the Department in its position that the new, streamlined FAFSA is a marked improvement over the current application. However, it is to be expected that we will encounter many bumps in the road in this initial year of uncertainty and delays, and we already have. A successful partnership between the financial aid community and ED means goodwill is extended by *all* stakeholders. Financial aid professionals will work to shield students from the adverse effects of any truncated timelines. The Department can partner in this effort giving schools the space and resources they need to focus solely on students for the next several months.

Regards,



Justin Draeger, President & CEO