



December 15, 2016

The Honorable John B. King  
U.S. Secretary of Education  
Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

The Honorable Ted Mitchell  
U.S. Under Secretary of Education  
Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

Dear Secretary King and Under Secretary Mitchell,

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and the undersigned organizations, I am writing to request changes to the required verification documentation for the 2017-18 award year, and specifically, the requirement that all non-tax filers must submit a Verification of Non-Tax Filing (VONF) Letter from the Internal Revenue Service (IRS).

The overwhelming amount of feedback from the financial aid community is these new, onerous verification requirements are having significant negative effects on the most vulnerable student populations and are creating a significant burden for them to complete their financial aid applications.

When the Department of Education (ED) announced the 2017-18 verification documentation requirements on April 1, we immediately inquired about the rationale for the VONF. At that time, the IRS Get Transcript Online functionality had been disabled for several months due to security concerns, leaving the manual paper request process as the only method to obtain a VONF. In defense of the requirement, ED staff cited data from the 2014-15 FAFSA year showing that 14.46% of parents and 16.51% of students who reported on their FAFSAs that they did not and will not file a tax return actually did file a tax return.

What these data do not reveal, though, are the results in terms of aid dollars awarded for the applicants who erroneously self-reported as non-filers. This misreporting of tax filing status, whether intentional or not, may not have had any significant impact on the aid awarded to these applicants. For example, a low-income applicant may have indicated non-filer status on the FAFSA and later completed a federal tax return in order to receive a refundable tax credit. Whether a tax filer or not, we question whether this tax filer's information resulted in any change. If ED has this data, it has not shared it with the community.

The IRS Get Transcript Online functionality was restored on June 7th, with a much stricter authentication process that requires the user to have (1) access to a valid email address, (2) a

text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). For those individuals who are not able to successfully register to use the Get Transcript Online tool, including many dependent students and low-income students and parents, they need to request a VONF letter using IRS Form 4506-T. A VONF letter is not available through the online Get Transcript by Mail or through the automated phone request process.

The requirements of the IRS authentication process preclude many non-tax filers from using the Get Transcript Online functionality, forcing them to use the manual 4506-T process. The burden of this process on many of our neediest aid applicants, combined with the uncertainty about the value of the new VONF requirement, makes this verification requirement untenable.

While many FAFSAs have already been processed this year in thanks to the earlier availability of the application, most applications have yet to be submitted. It is not too late to provide relief to these students and families. We request that ED waive the VONF requirement for non-tax filers who are selected for verification if the applicant does not meet the registration requirements for the IRS Get Transcript Online functionality. For these applicants, a self-certified statement of their ineligibility for IRS Get Transcript Online registration and their non-tax filing status should suffice for verification purposes.

Thank you for your attention to this matter. We look forward to your assistance in alleviating verification burden while still protecting program integrity.

Sincerely,



Justin Draeger, President & CEO

**Also on behalf of:**

The National Association for College Admission Counseling (NACAC)

The National College Access Network (NCAN)

The Institute for College Access and Success (TICAS)

**cc:**

James Runcie, Chief Operating Office, Federal Student Aid

Lynn Mahaffie, Deputy Assistant Secretary for Policy, Planning and Innovation, Office of Postsecondary Education

Jeff Baker, Policy Liaison and Implementation Director, Federal Student Aid