

# NASFAA's "Off the Cuff" Podcast – Episode 284 Transcript

## OTC AskRegs Experts: Are We Still Having Fun With FAFSA?

Allie Arcese:

Hey, everyone. Welcome to another episode of "Off the Cuff." I'm Allie Arcese with NASFAA's Communications team.

Jill Desjean:

I'm Jill Desjean with NASFAA's Policy team.

David Tolman:

I'm David Tolman with Training and Regulatory Assistance.

Allie Arcese:

We're all turning our brains back on after the winter break and after dealing with just FAFSA 24/7, Neg Reg, all of which we're going to get into today, and all of us had some snow days this week, too. In the DC area here, we got a solid three to four inches, so my kid was home from school. She was dying to have a snowball fight, which she loved, and she was super excited until her little mittens got wet. She just ripped them off her hands. She's two and a half, so this is the first time she really understood that it was snowing and she could play in it. She rips her mittens off and then grabs the snow with her hands and then freaked out, because it was so cold. Oh, it was so sad. It scared her. But aside from that, she had a great time in the snow. What about your guys' kids?

Jill Desjean:

My kids were home for two days yesterday and the day before. They are back today, although I hear there's weather happening tomorrow, so might get a-

Allie Arcese:

I know. We might get more.

Jill Desjean:

A bonus day for them, but yeah, you have a toddler who doesn't know how to operate in the cold, and that makes sense. I have a 14-year-old who doesn't know how to operate in the cold, so he went out to his middle school, which has a huge hill to go sledding, and he FaceTime-ed me, which he never does. He usually texts, and he's like, "I can't text you, because I can't feel my hands. Can you come pick me up? I can't feel my hands and my feet." We weren't shoveled out or anything, and so it took me a little while. He's like, "Are you coming soon?" Apparently, he was telling all his friends, "If I don't make it, tell my parents I love them." I was like, "You're 14 years old. Put on some mittens, dude."

Allie Arcese:

Yeah, to be fair, it was pretty cold, though. It was-

Jill Desjean:

It was, but he didn't have mittens on.

Allie Arcese:

Oh, the entire time? Yeah, that's not smart.

Jill Desjean:

Yeah, yeah, or boots.

Allie Arcese:

Or boots? What was he wearing, tennis shoes?

Jill Desjean:

Yeah, sneakers, sweatshirt, and a hat that doesn't fit very well, so his ears weren't covered.

Allie Arcese:

Oh, sounds great. David, the DC area shuts down if we get an inch of snow and it sticks. How much do you have out there?

David Tolman:

Okay, well, you would think we have 10 inches, so there's still most of the country that are like, "Oh, you shut down at 10 inches." But we did get freezing rain last night, and the roads are terrible and buses and all that, so school's canceled. My youngest is home today. Maybe I'll knock off early, and we'll build snowmen, make snow angels. No, he's 18. He's going to shovel the driveway. That's what we'll do.

Allie Arcese:

I know, I know.

Jill Desjean:

We have kids.

Allie Arcese:

Yeah, well, I feel like it would be a questionable choice. We might get some authorities called on us if we had our two-year-old shovel the driveway, so hold off a couple more years.

Jill Desjean:

Wait 'til she's four.

David Tolman:

But, she'll be out there before you know it voluntarily just following you around, and you'll have to snap some pictures to remind her in 10 years what she used to do willingly for fun.

Allie Arcese:

Oh yeah, I know, I know. Well, we have a lot of ground to cover today, so we'll get into it. Then, we'll all leave and go take a little nap by the fireside while we enjoy the snowy weather.

Jill Desjean:

Love it.

Allie Arcese:

Sorry, Justin. So Jill, we recently had another round of Neg Reg. Last time, the last couple months, it was around student debt cancellation for different buckets. This is a whole new category covering a number of topics. Can you fill us in a bit?

Jill Desjean:

Yeah, yeah. So while the department works behind the scenes to publish some draft language to put out for public comment on the Student Loan Debt Relief Committee, they have assembled another committee and this one is on program integrity, institutional quality, and they've got a subcommittee on the TRIO programs.

Allie Arcese:

And what specific areas of the regulations are they looking at?

Jill Desjean:

So they're looking at accreditation, at cash management, state authorization, distance education, and everybody's favorite topic, R2T4.

Allie Arcese:

Yeah, there's a lot of topics there that touch on our issues, so can you share some of the highlights that they got through this first session?

Jill Desjean:

Yeah, I'll get us started off with cash management since that's where the department got things started. They had a couple of interesting proposals. One of them was pretty simple. There's a provision in the regs that allows schools to use \$200 of current year Title IV funds to pay off a student's past due balance. So this is helpful to students if they've got some small balance from the past year that's keeping them from being able to register and continue their studies. If they're eligible for Title IV aid in this term, they can use \$200, apply it toward their balance from the last term, and hopefully register, get enrolled for the next term. The department just wants to raise that to \$300 to account for inflation. The last time when they established this \$200 was in 2007, and obviously things have changed. So this one was pretty non-controversial, some discussion, but there didn't seem to be any opposition to it. It seems pretty common sense.

Another thing the department is looking at is a practice some schools engage in where a student's meal plan has these flex dollars, which are essentially cash equivalents that they can use around campus. So when you think of traditional dining halls on campuses or a long time ago when I went to college, you just had three meals a day at the all you can eat dining hall. But now, there are many more options available to students. So they might still have that X meals a day, but then they've got ... They can go to the pizza place on campus or the convenience store or whatever and use these flex dollars on their meal plan cards. The practice that schools typically follow now is that if a student ... It's use it or lose it. So if you've got these flex dollars on your meal plan account at the end of a term or at the end of the year,

the school, they call it sweeping. You lose the money. The school keeps it. The department is proposing to not let schools do that anymore, to actually refund the cash equivalent to students.

Their argument's pretty basic. They say it's the student's money. If it's like cash, it's cash. You should give it back to the student, and this would apply just to the flex dollars. So if you had 21 meals a week and you didn't use two of them, there'd be no cash value to that. No one would have to refund that to you. But if you had these flex dollars in your meal plan, the money would have to go back to you. There was some discussion here about just student choice, maybe letting students be able to decide to carry their funds forward from one term to the next, instead of having to refund them every time. But I think some negotiators were thinking about proposing a de minimus amount, because you don't want to have to refund 29 cents. But otherwise, I think negotiators were pretty okay with that. One other cash management topic that met with a lot of discussion was about eliminating a provision in the regs that allows schools to include books and supplies in the tuition and fees charges.

Allie Arcese:

And what's the rationale behind that?

Jill Desjean:

So right now, just for background, schools can include books and supplies in their tuition and fees, and students have to opt out if they want to buy their books elsewhere. Not every school does this, but some schools choose to include the books and supplies in tuition and fees, and it's automatic unless the student says, "I don't want to do that. I want to go buy my books and supplies from Amazon or wherever it might be." The department is saying that they want to make this an opt-in process instead. They say that they've heard complaints from students, saying that they found better, cheaper options elsewhere. Negotiators push back on this, because the current regs actually stipulate that in order to include your course materials in tuition and fees, the school is supposed to have insured that they're offering below competitive market rates. So the concern is, why is the department wanting to write new regs to address a problem they've identified that is really a result of not enforcing the current regs?

So negotiators were arguing that including books and supplies in the tuition and fees not only allows for cheaper options due to this bulk purchasing power of the school and the fact that they have to ensure that the books and supplies are below market rates, but it also ensures that students have their books and supplies, which can be a big concern at some schools. Even if they get a refund, many times they don't. But even if they get a refund, they might not necessarily use the money for books. If money is really tight, I might choose to buy food instead of books. That's a rational choice, but it will leave them maybe weeks or even months or maybe the whole term without their books. So they say by forcing the student to buy the books through the school ... I don't want to say forcing, but by having it be this automatic process, at least you know students have their books for the first day of classes.

Allie Arcese:

Right, and they're not forced into that even more difficult choice of books or food.

Jill Desjean:

Yeah, yeah, so yeah, so more to come on that. This is just the first week, but it was a really lively discussion, really good.

Allie Arcese:

Yeah, that's interesting. What about R2T4? Did they get into match there? And what's ED proposing?

Jill Desjean:

Yeah, unfortunately it's not a major overhaul of R2T4. When we gave verbal comments at the start of this whole process last summer, we went all in. We were like, "Hey, this is a great chance to just rewrite R2T4." They didn't do that. So it's more about tweaks, just some little minor tweaks versus huge changes, nothing in the way of an overhaul. They're proposing some modifications on R2T4 for programs offered in modules. David could speak about this for days. Modules are some of the harder things to manage when it comes to R2T4. So one of the things the department has proposed is getting rid of this 49% completion rate withdrawal exemption that was introduced the last time they negotiated R2T4.

This is, again, just for programs offered in modules, and it was a way to say that a student had basically completed enough to not have to return Title IV funds. The department's rationale was that it's just too complicated. Schools just didn't understand it. They didn't know how to use it. The financial aid administrators at the table actually argued to keep it, because they said it's better for students. So they said that they were willing to accept the complexity and figure it out in the interest of students, in the best interest of students. So hooray for financial aid administrators for just being like, "Hey, we will deal with this tedious work, if we can help some students." So that was actually a funny thing to say.

Allie Arcese:

Yeah, that's why we're here at the end of the day, right?

Jill Desjean:

Yeah, indeed, indeed. Yeah. I personally thought they might be in favor of the simplicity, but in this case, no. Another proposal with respect to modules, again, is this concept of a freeze date, which exists in guidance that determines the number of days in a payment period of the R2T4 calc. So getting the number of days in a payment period is critical to the R2T4 calculation, because you're figuring out, of course, what percentage of the payment period the student completed. If you get that wrong, you get the whole calculation wrong. David could talk about this again for days. What the department is proposing is to eliminate the need for this freeze date and to just say a module is part of the payment period, if the student attends the module. Financial aid administrators supported this.

They said it's one of the more confusing things of R2T4, and presumably, I don't remember hearing them say this, but not as beneficial to students as the 49% thing. So they were happy to see simplicity when there was nothing in it for anybody, essentially. The department is also proposing something that would relieve some R2T4 burden in certain cases. One of those has to do with when schools offer generous tuition refund policies for students who withdraw. This is typically early in the semester if you only attend for a couple days or a couple of weeks, but they even gave examples of maybe later in the semester, if someone withdraws for medical reasons or something. The school might effectively treat the student as if they had never attended.

The department is saying, "If you have these policies where if someone withdraws for whatever reason and falls within your policies for 100% refund of tuition, you can go ahead, return all of the Title IV aid, forgive any balance that might be left on the student's account as a result of sending back that Title IV aid." If a school does all those things, they don't have to bother with the R2T4 calc. The idea is in a lot of these cases, someone probably earned 4% of their financial aid, but the school is having to go through this tedious calculation. So they clearly want to see schools doing this for students to basically erase the fact that they ever attended for a short time and to encourage that they're giving them some relief on R2T4.

Allie Arcese:

You just kind of consider it a wash.

Jill Desjean:

Yeah, yeah, and separate, but related to that is with respect to students who never do enroll, but intended to enroll and get a refund of their loan proceeds. You can get a refund within 10 days of the start of classes. Right now, what happens is if you get that loan refund and you decide three days before classes start that you're not going to attend, your loans, the refund that you got becomes payable immediately. You get issued a demand letter and you're just supposed to send it all back. The idea is that sometimes, you might've used that money, right?

You were planning on attending school, so you might have already bought your books. You might have put a deposit on an apartment or something like that that you can't get back. So it might be really hard for you to repay those loans right away. So the idea is to let them repay the loans according to the promissory note terms, so basically just pay over 10 years or go on income driven repayment or whatever it might be. The money still goes back to the taxpayers, but the student isn't put into some really difficult position because of having to change their mind about going to school within a couple of days of when school starts.

Allie Arcese:

What else? You said-

Jill Desjean:

I know, I feel like [inaudible 00:14:34]-

Allie Arcese:

Not a big overhaul, but there's a lot of little tweaks here and there.

Jill Desjean:

There are a lot. Right. This sounds like-

Allie Arcese:

So it's not a lot, but it's also a lot.

Jill Desjean:

Yeah, there are 200 pages of regulations for R2T4. So even though this is a time, it's just sentences in the regs. Yeah, withdrawal exemption is being proposed for incarcerated students who have to withdraw due to circumstances beyond their control. So obviously when you're incarcerated, a lot of things happen that you don't run. You might be transferred against your will involuntarily. The carceral facility could go into lockdown for some reason. You might not be able to attend classes because of that and might have to withdraw. So the department is just trying to make sure that schools don't have to do an R2T4 calculation for that reason, especially if it might leave a student with a balance due. So yeah, most of these R2T4 proposals were viewed pretty favorably by the negotiators at the table, which was primarily just the department and financial aid administrators, since obviously most of the people at the table, R2T4 is way too involved for them to-

Allie Arcese:  
Completely foreign.

Jill Desjean:

Exactly. They don't know, and I think they don't care. They're just happy that that's not their job. There was one provision that saw some pushback with respect to R2T4, and that was where the department is proposing, essentially, they're making this argument that if a student is enrolled only in distance education, that it's easy for a school to be able to tell when they have ceased enrollment, when they would be withdrawn, because whatever distance ed platform the school is using should be tracking all sorts of activity, not just going into the class and attending a lecture, but engaging in some sort of chat with classmates, submitting assignments, watching videos, whatever it might involve. So their point is basically, since you can track attendance very easily, their words, not mine necessarily, all distance education programs are essentially attendance taking programs, even if you're not at an institution that is an attendance taking institution.

So they want to eliminate the option for schools, just for programs offered exclusively through distance ed. They want to remove the option for schools to use the midpoint of the term to determine last date of attendance, because they're saying, "You have better data than that. You know when the student's last date of attendance is." Negotiators pushed back on this a bit, just from the point of view of not necessarily in concept, just in practice. They said, "I don't know if this is as easy to do as you think it is." Yes, everyone uses different platforms.

Whatever platform you use might track a lot of things, but it might not track the exact things that would contribute to whether a student had ceased enrollment or not. And even if it did, that's its own system. That's not the system that the school is using for their R2T4, so there still would have to be some kind of communication set up between these systems. They were just like, "Maybe not the worst idea. We get where you're going with this, but the premise that this is easy is a flawed premise. So let's look at this a little bit more and make sure that it actually is easy before we go ahead and say, 'Everybody do this.'"

Allie Arcese:

Right, it needs further discussion, testing. Anything else that was covered?

Jill Desjean:

So much. We don't have time for everything. One other really interesting proposal, before I drop this entirely, was with respect to students being educated, again primarily through distance education, and schools now having to report them as attending an additional virtual location. So basically right now, distance education from the reporting perspective is the same as non-distance education. So you really can't tell if a student is enrolled primarily distance or primarily in person from the Department of Ed's perspective and the data they get from schools. So what they want to do is with a school's OPE ID, there's this extra two digits that get added on to OPE IDs when schools have additional locations. So if you've got other campuses and other places, you already designate your students as, these students are at our main campus. These students are at our branch out in this place. These students attend here.

They basically want to create a virtual location for distance education. So you'd have a separate, not ... same OPE ID number with a different two digit extension that would designate these students as distance education. The department is saying that this is primarily for data purposes. They said that this would help them to be able to actually track student outcomes based on their modality of learning, whether they're primarily distance ed or they're primarily in person, but they also said it would help them to issue closed school discharges. Because right now, if your school discontinues distance

education programs, you don't qualify for a closed school discharge, because the school is still open. This would enable that, because that location would close, and students could qualify for a closed school discharge.

Allie Arcese:

How was that taken?

Jill Desjean:

It was mostly people asking operational questions, because having an additional location actually involves a lot of compliance activity. Schools need to get approval to have an additional location, and there's just a lot of compliance around that. So they were saying, "Okay, I'm not opening a physical campus someplace. This is just this virtual location. Would I still have to comply with all of those rules about additional locations? Or is this really just a record keeping thing and not a big deal?" The department implied that it would be the latter, that it was not ... All of the compliance stuff about additional locations wouldn't apply. It's really just for tracking students, just figuring out which modality they're learning in. So I'm sure they'll probably have more discussions about that.

Allie Arcese:

Yeah, so it was a maybe.

Jill Desjean:

Then, of course we don't have time to get into, accreditation was another huge topic. They spent either a full day and a half or maybe even a full two days. Accreditation, to me, was like R2T4 was for everybody else at the table. I couldn't really follow it. I don't know much about it, so much detail and so much to talk about, and just sort of glazed over. Okay, yeah, sure. That sounds terrific. But the big goal, I understood this, the department was saying they're looking to increase the rigor of the accreditation process. That's one of their big goals.

They spent a good amount of time talking about governing boards, conflicts of interest, ensuring that the people who are participating in the decision-making bodies of accreditors don't have any conflicts of interest. On the state authorization side, which is another place where I will not claim any expertise, I can at least say the department is looking explicitly at state authorization reciprocity agreements. Both of these topics are of great interest and great relevance, spurred lots of discussion, but we don't have enough time to talk about them, and I'm not the expert to talk about them, so plenty of opportunities to hear about those from the experts in those areas.

Allie Arcese:

Yeah, and we do have some recaps in TN from those sessions that folks can read, and we'll link those in the show notes. When do they pick up for their next session?

Jill Desjean:

They start February 5th.

Allie Arcese:

Same week as our leadership conference, a little overlap there. All right. Thanks, Jill.



Jill Desjean:

All right.

Allie Arcese:

So now, we're going to turn over to David Tolman. The last time we spoke, the FAFSA had not yet launched. A lot has changed since then. Are we still having fun with the FAFSA?

David Tolman:

Allie, you sure you don't want to talk about the great Idaho potato drop on New Year's Eve?

Allie Arcese:

Oh, actually, how was it?

David Tolman:

It just keeps getting better every year.

Allie Arcese:

Yeah? Were there fireworks?

David Tolman:

Huge fireworks display. Yes, all kinds of people. You said I downplayed it, and so I actually watched it this year, not in person, but on TV. Yeah, you're right. I probably downplayed it a little bit. It does get better.

Allie Arcese:

It was pretty epic, the video that I watched, it was ... yeah.

David Tolman:

Pretty good.

Allie Arcese:

It looked pretty cool.

David Tolman:

So yeah, that was what we were looking forward to on January 1st, not so much fun with FAFSA, but we have a soft launch of the FAFSA now. And-

Allie Arcese:

Right, and it was a soft launch towards the end of the year. December 30th, I guess, was the official go live date. Then, sometime last week, was it? The the FAFSA is open 24/7, which I guess that marks the end of the soft launch, maybe. We're a little unclear.

David Tolman:

Yeah, if you look at their status, they're still kind of in the soft launch phase. They're still working through some of the issues that have been-

Allie Arcese:

Take us through some of those issues. I know there's been a lot of chatter, but what are the highlights?

David Tolman:

Yeah, so I'm going to go through. Anyone can go and look into this in more detail if you want, but it's from FSA's '24, '25 FAFSA Issue Alerts webpage. We'll go ahead and bookmark that in the show notes so you can get to it. So if by the time this is ... someone's listening to this, this could change, because this is all stuff that's definitely in a state of flux, and they're working on fixing these, but there's a lot of issues with applicants just getting started or inviting others, contributors to start.

Allie Arcese:

That's a pretty big hurdle, just being able to log in and start the application.

David Tolman:

Yeah, so let's start with the FSA ID issue. That's when a contributor receives an error message, and they cannot move past step three on the create an account page, trying to get their FSA ID.

Allie Arcese:

Okay, so this is when they are setting up their FSA ID, not even accessing the application?

David Tolman:

Right.

Allie Arcese:

What prompts that message to appear?

David Tolman:

Okay, so the user, the first one into that FAFSA invites a parent or a spouse without an FSA ID at the time to be a contributor. A contributor is somebody who has to provide information on the FAFSA and allow that IRS data transfer through the FA-DDX to occur. Okay, so the contributor who's been invited and does not yet have an FSA ID, they try to create that FSA ID account prior to the match with the Social Security Administration completed. It's in a pending status, rather than a full status. Now, the parent is stuck, but there is a fix for this one. The parent can delete the mailing address entered on the create an account page, then create an account, and then add the address in the settings after the account is created. Or, the other one is wait until the Social Security Administration match is at full match. That's probably the best practice. Then, wait until the parent or spouse has created the FSA ID account before inviting them to be a contributor.

Allie Arcese:

Right, and this is why we encouraged people to set up their accounts before the FAFSA opened, right?

David Tolman:

Yeah, yeah. We've been talking about that for a long time, several months back. Get your FSA IDs. But now that we're into it, and not every applicant knows all these steps, it's all new.

Allie Arcese:

That's no fault of the students or the parents, just some glitches we've got to get through.

David Tolman:

Yeah, and anecdotally, it's not on their page, but we've heard that those without a social security number can't even create an FSA ID.

Allie Arcese:

That's a big one. Parents without a social security number are experiencing some other issues, too. Is that correct?

David Tolman:

Yeah. If a parent does not have a social security number, effectively it puts on hold the whole FAFSA form for the student and the parent. They're getting an error message that says, "Unauthorized to act on behalf of the student, since they already have a '24, '25 FAFSA form," even though that hasn't even been started. They're getting that error message. So what's happening is the parent who doesn't have a social security number starts the FAFSA. Then, that error message will appear on the student information page. This will appear, even if it was the student that started the FAFSA.

Allie Arcese:

Is there currently a workaround for this issue or a fix?

David Tolman:

Yeah, unfortunately, unlike the FSA ID one, there is not a fix. So we are all, and especially the student and the family there, are waiting for the department to resolve this issue. So no parent without a social security number can either begin a FAFSA or contribute parent information to a FAFSA that a student started. Then anecdotally again, not on the department's page, but we've heard that the FAFSA second parent or spouse, not necessarily the contributor, but they just need the demographic information from that second parent, if that parent doesn't have a social security number, they're not able to progress in that situation at all. They can't enter all zeros in the social security number field. They can't provide just their demographic information. Then, they can't submit a FAFSA. So it really is, there's a lot of issues around parents and some with students who don't have a social security number.

Allie Arcese:

Those are pretty pressing issues, so we're definitely keeping tabs on that Issue Alerts page and seeing fixes as they come up, but what are some of the other issues that we've seen with this rollout?

David Tolman:

Okay, yeah, some are just strange situations. This next one is a married student or a married parent not providing the spouse's required information before they leave the FAFSA. So the steps on this is the student or the parent begins the FAFSA, and they save and exit the FAFSA before entering the spouse

required information. Then, when they go back and return to the FAFSA, they can't enter the spouse's information, and as a result, they cannot submit the FAFSA.

Allie Arcese:

That definitely seems like a notable glitch. Is there a fix for this one or a workaround?

David Tolman:

Yeah, there's nothing that the applicants can do on this part, so there's not a fix. Again, we're waiting for the department to issue a fix for this.

Allie Arcese:

Okay, and is the signature issue still a problem?

David Tolman:

Yeah, so there's cases where the previous student or parent who have gone in and completed the FAFSA and signed it, that that signature is removed. This happens in cases where there's more than one contributor on the FAFSA. So it could be you've got the student and then a parent, so you've got two contributors there. Or in some cases, the student's spouse, they sign the form. They save it. They reenter the form. So the first one saves it. They reenter the form before other contributors have signed and submitted. Then, those other contributors return to the form. Then, the signatures for everybody who's completed the form before them, all those signatures have been removed. So let me give an example, because it's kind of a complex situation. So let's say there's a student with two parents. The parents filed the tax return as married filing separately. So both parents are going to need to be contributors, because both need to provide that authorization for their tax data to be transferred over to the FAFSA.

So a student, two parents, in this example, there's three contributors. The student starts the FAFSA, invites the parent contributors. The student signs the FAFSA, saves it. Parent number one, a contributor, signs the FAFSA and saves it. Now in this case, if either the student or the parent who both signed the FAFSA enter the FAFSA before parent two goes in and completes it and signs it, the student's and parent one's signatures are going to be removed from the FAFSA. So it doesn't end. So there is a fix for this. The student and parent one need to go back and reenter the form and sign ... not reenter, but not enter all the information, but go back into the form, sign it. It doesn't require any minor corrections. You can just go in and sign it again, so it's an easy fix, but you can see it causing a lot of confusion for a family that this can lead to.

Allie Arcese:

Yeah, I could see that being really frustrating, sitting there and knowing you signed it, and oh, my goodness.

David Tolman:

It might take a while to communicate to the financial aid office enough information. Then, hopefully they're talking somebody at the financial aid office who understands, okay, I see what's happening here. This is what you need to do, or they're getting the help over the FSA line.

Allie Arcese:

That's a good point too, is that everyone working in financial aid doesn't just need to understand the form as it is intended to operate, but they also now need to understand these issues and how to work around them.

David Tolman:

Yeah, and obviously this one probably is affecting a lot of people.

Allie Arcese:

Yeah, because I could see that, for sure, happening to a lot of people, hopping in and out and talking to each other as you're finishing it, but we've got a couple more. What are some of the other ones we're seeing?

David Tolman:

Yeah, so as that last one probably affects a lot of people, this next one's pretty obscure. It happens with a student that has no social security number, but they're unable to exit and return to complete the FAFSA. So this is what has to happen. Student initiates the FAFSA and does not enter state of legal residency. Now, that might be left because a student ... or might be left blank, because the student without a social security number is most likely an eligible non-citizen completing the FAFSA. So they might not know where to ... State of legal resident, well, I'm not really a legal resident, because I'm not a citizen. Anyway, they leave it blank. They save it and they exit. They're not going to see, when they go back to finish it, they're not going to see the FAFSA draft when returning to complete it, and they cannot start a new FAFSA. So basically, they're in limbo.

Allie Arcese:

They're just locked out?

David Tolman:

Yeah, so student without social security number leaves the state of legal residence field blank, then exits. They're stuck. No fix for this one.

Allie Arcese:

No fix yet or just no fix?

David Tolman:

No fix, nothing that the student can do. We need to wait for the department, another one that we're waiting for them to resolve.

Allie Arcese:

Yeah. Are we aware of any issues beyond those that have been reported by the department?

David Tolman:

Yeah, so I want to emphasize NASFAA is not the official place where people should be reporting the issues, but we become aware of some because we're part of the community. So anecdotally, we've heard that cases of the FAFSA automatically submitting itself before the student or the contributor pushes the submit button, but what seems to be happening is they've gotten to the point where enough

information has been put into the FAFSA for it to be considered complete, and it's just jumping them to the gun and submitting it for them. So it's saving them the problem of hitting submit.

Allie Arcese:

Does that include, I guess, their signature would've already been-

David Tolman:

Yeah, signature would have to, yeah. What we have heard, so again, this is not one that ... I know it's been reported to the department, but it's not on their list. So from what we've heard from the community, it's an okay FAFSA, but what makes it difficult is schools are not getting the FAFSAs yet. They're not getting the results back, the FSS, FAFSA Submission Summaries to verify, don't worry about it. It should be okay. So there is some anxiety there. Anecdotally, we've heard there's some users getting a message, "You changed your FSA ID info," every time they go back to enter the information on the FAFSA, even though they haven't changed their FSA ID info.

Allie Arcese:

Oh, gosh, that one would drive me crazy, for sure. Well, have any other issues been resolved?

David Tolman:

Yeah, the page was updated. The FSA's page of issues was updated on the 14th, and an announcement went out yesterday to bring attention, is the parent country error message. So what was happening is each time apparent reentries a saved '24, '25 FAFSA form, the country previously entered by the parent did not carry over, but that's now fixed.

Allie Arcese:

That's now fixed, great. Well, that's one checked off the list. That's progress.

David Tolman:

I'm sure they're working frantically on many others, and we are all anxiously awaiting.

Allie Arcese:

I know, yeah. So where can everyone keep up with the status of all of these issues?

David Tolman:

So you can Google '24, '25 FAFSA Issue Alerts, and that will get you to the page, but also give it to you and maybe we can get the link directly in the show notes.

Allie Arcese:

Sure thing, will do. Thanks, David. That was really helpful. Next time you see this group, we'll give you another roundup of fun with FAFSA, but thank you everyone for joining another episode of "Off the Cuff." Send us your questions, comments. Remember to subscribe, tell a friend, and we'll see you again soon.