



23 November 2021

Mr. Richard Cordray  
Chief Operating Officer  
Office of Federal Student Aid  
U.S. Department of Education  
830 First St NE  
Washington, DC 20002

Dear Mr. Cordray:

Today, our four organizations are reaching out to you because of our common interest in FAFSA completion and our grave concerns about the repeated and increasing reports of technological challenges in the FAFSA filing process. Since the FAFSA opened on Oct. 1, 2021, for the 2022-23 award year, our collective memberships have fielded a growing number of concerns about technical problems when students and parents are attempting to complete the FAFSA. We are elevating these matters to you given the urgent and systemic nature of our concerns.

The memberships across our four organizations represent: over 550 college access and success organizations that work with approximately 1 million FAFSA filers annually, 28,000 financial aid administrators at 3,000 colleges that serve 9 out of 10 undergraduate students, 25,000 school counselors and college admissions professionals, and nearly every state agency administering state-based financial aid.

Given the ongoing pandemic, FAFSA completion rates are already facing steep declines. Overall FAFSA filing rates for the first three quarters have fallen 3.5% from the 2019-20 award year to the 2021-22 award year. That's a loss of 220,000 FAFSAs for the 2020-21 cycle and 458,000 for the 2021-22 cycle. The most recent two cycles have seen a loss of nearly 678,000 FAFSAs filed in the first three quarters alone. (Data compiled from the FSA FAFSA Volume Reports [by state](#).)

For high school seniors, the concern is even more dire. The high school class of 2021 completed [102,000 fewer FAFSAs](#) than the class of 2020, and 190,000 fewer than the class of 2019. This drop is on top of the decline of the class of 2020, which fell 3.7% from the year before, a loss of approximately [80,000 FAFSAs](#). Combined, that's 270,000 fewer FAFSAs across two high school classes. The class of '22, as of Nov 12, is [down 3%](#) or more than 23,500 FAFSAs from this point last year. (Data compiled using [Form Your Future FAFSA Tracker](#), based on FSA Application Volume Reports by high school.)

At a time when both FAFSA completions and postsecondary enrollment is falling, all efforts must be made to reverse the course. A FAFSA filing process that creates additional barriers will not help our country achieve that goal. Fixing the current technology complaints is an immediate need in the face of these declines; but also, a long-term goal as the implementation of FUTURE and FAFSA Simplification Acts is well under way. These technical errors must be resolved urgently.

Currently, the memberships of all four co-signed organizations are reporting regular and repeated issues of the FAFSA freezing and/or forcing logouts by students and parents, both leading to loss of data entered. Additionally, there are reports of miscellaneous error messages, FSA ID and IRS Data Retrieval Tool (IRS DRT) malfunctions, and signature page glitches. Additional hardship is then caused by call center wait times around half an hour, confirmed by one NCAN staff member on hold for 37 minutes. (A full list of reported issues is attached to this memo.)

These delays are not mere inconveniences. Students are frequently filing the FAFSA at FAFSA night workshops or during appointments with college advisors, financial aid administrators, or school counselors. If the student encounters an error and must wait on hold 30 minutes before being able to address it, it is likely that the student may have to abandon the process all together given the time constraints of their class schedules and appointments. Students who must abandon the process may not return to it. Parents who have concerns of sharing their financial information grow leery as the website malfunctions. Students without the support of a trusted advisor will struggle most of all, and those are the students whose stories we do not capture.

Our organizations continue to submit these concerns to FSA staff, who respond promptly that they will investigate. We have been informed that staff are aware of technical issues and that they are attempting to address them with fixes or patches on a daily basis. However, we are seven weeks into the FAFSA season, and the problems persist.

The need for a permanent resolution to these problems is paramount. There is no time to spare given the decision making happening at kitchen tables over the holidays. State aid deadlines come as early as Jan 1.

We ask that the FAFSA be repaired in time so that it is fully functional to support decision-making and state priority aid deadlines. Further, the call center must be staffed so that they can meet the metrics stated in goal two of the [FSA strategic plan](#) to provide world class customer service with call answer times of one minute. Finally, we ask for a separate help center for advisors, financial aid administrators, and counselors who are supporting FAFSA completion.

We additionally recommend more frequent data checks on abandonment rates for started FAFSAs and completed FAFSAs. Additionally, we urge FSA to increase its outreach to students, with an email or cell phone on file, who have started but not completed their FAFSA.

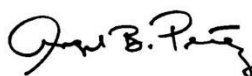
The undersigned leaders of our organizations are eager to support these efforts by providing further evidence, examples, and brainstorming. Our organizations commit to additionally providing outreach to our members to share any updates, tools, or resources available. Thank you for your time and leadership.



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CC: Mr. James Kvaal, Under Secretary, U.S. Department of Education

Dr. Michelle Asha Cooper, Ph. D, Deputy Assistant Secretary for Higher Education Programs, U.S. Department of Education

Mr. Chris Greene, Deputy Chief Operating Officer at Federal Student Aid, an Office of the U.S. Department of Education

Attachments

## FAFSA Technical Issues 2022-2023 FAFSA

This document includes summary feedback of technological errors with FAFSA filing for the 2022-23 award year. Responses in quotations are direct member feedback. Statements without quotation are organization staff summaries of member outreach.

### FSA ID

- “I’ve had problems with FSA ID creation. We would make it all the way through to the verification of email/phone. When they put in the code an unknown error occurred and it pushed us all the way back to the beginning of the process like we never did anything. This happened to multiple students.”
- “We have been having issues each week with the FSA ID process timing out and in some cases, the student and parent has to start all over. This has also happened with the FAFSA application. It has been a bit frustrating, but in most cases we are able to complete the process.”
- “The other thing we noticed is that we weren’t able to do a parents FSA ID at the same time we started the students FAFSA. We needed to have both FSA IDs for the parent and student before we even got in the FAFSA form.”
- “We had students have issues at the FSA ID step held at an area high school. System would say "unknown error". We ended up calling FSA, they stated it was either the server or that they were using Google Chromebooks. Evidently that’s an issue.”
- “Staff here involved with FAFSA nights locally are reporting students and parents having trouble with establishing FSA IDs, including messages that the SSN is wrong but once cookies/cache cleared some (but not all will get the FSA ID).
- “The parent sets up their FSA ID and assists their student with completing the FAFSA on the same day. When they reach the sign and submit part of the student’s FAFSA, the parent receives a message that they must wait 1 to 3 days before they can use the FSA ID to sign the student’s FAFSA as the FSA ID is listed as “pending.” Parents are supposed to be able to sign the FAFSA with the FSA ID, even if the FSA ID is listed as pending.”
- There have been several reports of not being able to use the FSA ID for FAFSA signature purposes when the ID was created during the FAFSA completion process. Filers were receiving a message that they need to wait the 3-5 days for FSA ID processing and were not allowed to use it immediately for signature. This error has been most often associated with parents who were creating their FSA ID when filing the FAFSA.

## WEBPAGE ERROR

- “The most common problem that we are having with our high school FAFSA filing sessions is the webpage error. As the students and parents are progressing through the application, it just stops. The message is similar to "there has been an unknown error that has occurred, please try again later". It is very frustrating for our students and parents. Sometimes the student can log back in and continue, others cannot because now the SSN is being verified. It will be 1 to 3 days to continue.”
- “I have experienced several occurrences where students were disconnected from the FAFSA webpage. When the student attempted to reassess the FAFSA website, the student would receive an error message that the site was temporarily unavailable or down. The student would retry within less than a minute and could access and log into the site. However, the information did not save from where the student and I left off before being disconnected.”
- “I have experienced multiple disconnections from the web page during the section where the student/parent signs the FAFSA. Additionally, if the student tried to go back to a previous section, we were disconnected from the webpage and required to log back into the FAFSA.”
- “There were instances when the student would select the option to move forward to the next section, but the page would freeze. Subsequently, the student was disconnected from the web page and unable to pick up where they left off because the information stopped saving at some point. These disconnection issues took place in different locations, so I do not believe the disconnection was related to internet service(s).”
- “I had many webpage errors similar to others with the unknown error occurring in the FAFSA on the web version. It was difficult to get back in and usually required clearing the cache or cookies to get it to work again.”
- “Several students at different schools’ events encountered the error "system couldn't process the information at this time" when trying to create a save key for the first time”.
- There are several reports of students/families getting kicked out of the FAFSA website. Once the families attempt to log back in, there is no record that the FAFSA was started and they have to begin again. Some reports of this happening multiple times to the filer.
- Many filers have received miscellaneous error messages appearing on various pages that stop the ability of continuing through the FAFSA. Students must log out and come back in to progress through the form.
- We have received several reports of slow movement through the FAFSA screens-continuous buffering on pages to 20-30 seconds between pages when hitting the next button.
- Some members report issues when using Chromebooks and that students experience the stoppage issues more frequently on these devices. These are also the most common devices in schools. One

member reported call center instruction to use the mobile app instead of FAFSA on the Web because it was working more consistently.

- On November 2, 2021, the entire studentaid.gov website went down for about two hours and no one could complete a FAFSA.

## FAFSA FORM

- “Another issue reported by staff at the events is that they have seen when the student/parent has put zeros for all the additional income information, the system will not let you move forward - stating all questions need to be answered - even though all questions have been answered.”
- “In the parent financial portion, there is that page about combat pay, education credits, IRA deductions, etc. That page auto-fills 0’s, which was accurate for this family, but when they tried to click “Continue”, it lit the boxes up in red and essentially said they had to enter data in every field even though 0’s were already there. They had to erase the existing 0’s and retype 0’s in order to proceed.”
- “The 2022-2023 FAFSA sometimes gets stuck on the untaxed income section of the FAFSA. Even after retyping the zeroes, it doesn’t let the applicant proceed. The student has to log out and log back into the FAFSA in order to proceed past this section.”
- “We’ve had a couple students inform us that they’re unable to sign and submit their 2021-2022 FAFSA on the studentaid.gov website. They’ve attempted to use different browsers and when they contacted customer support they were told “it would be resolved in a few weeks”.
- “We’ve twice experienced a situation where students couldn’t move past a FAFSA page due to an error prompting them to enter information that was already provided. Both times they had to close out of the form a few times before they were able to proceed to the signature page. We tried multiple browsers, both were FAFSA on the web, one was a correction, and one was an application.”
- “The family also never received the confirmation email with their SAR (to this day) and they completed it about 12 days ago ... when they went back into the FAFSA, it gave the appearance the family had to start over (the FAFSA) again. They reported no issues with any web browser (they used Chrome).”
- One report of FAFSA data submitted correctly and the system placed the parent financial information into the student section which created a very large EFC. We have the documents to support the issue and FSA is currently investigating that instance.
- The FAFSA system cannot currently print a signature page for the corrections process (for the 21—22 and 22-23 FAFSA) if the parent(s) are undocumented immigrants. FSA is aware and has announced on the FSATech Listserv that the issue will not be fixed until mid-December.

- From the FSATech Listerv: “We are experiencing an issue with 2022-2023 dependent student ISIR corrections inadvertently returning comment code 296 (This SAR reflects the parental data that you have added to your FAFSA) and a special circumstance flag of 02. This appears to be happening when a dependent student makes a correction to their initial FAFSA application (that includes parent information) to correct information other than parental data. The 02 ISIR transaction is then returned with this comment code and flag even though corrections were not made to the parent information.”
  - Response: “Some 2022–23 dependent student ISIR corrections are inadvertently returning Comment Code 296 (stating parental data has been added to the associated FAFSA), even though parental data has not been added or changed. This appears to happen when a dependent student makes a correction to their initial FAFSA application to correct data, including parent information. Federal Student Aid is aware of this issue and is working on a solution to get it resolved.”

## **IRS DRT**

- “Issues with the DRT not working have been the most common for us. “We are unable to provide you...” even though the tax filer info is directly from the return, and they have no identity theft or blocks on their record with the IRS.”
- “Issues with parents attempting to access the IRS Data Retrieval Tool. Parent types in the address exactly as it appears on the tax return and clicks “submit.” Parents receive the message “you are only permitted to access this tool via the U.S. Department of Education’s site.” Parents must log out and log back into FAFSA and try again in order to get the IRS DRT to work.”
- Members report that students are not being able to access the DRT even though all information appeared to be correct and match their tax forms.
- Some ISIRs had to be re-run due to DRT problems.