



November 4, 2009

To Whom it May Concern:

On behalf of the nearly 3,000 member institutions of the National Association of Student Financial Aid Administrators (NASFAA), I am writing to offer our comments on the draft 2010-11 Free Application for Federal Student Aid (FAFSA).

We appreciate the Department's continued efforts to clarify and improve the FAFSA structure and language. While not all suggestions from the financial aid community come to fruition, we commend the Department on its diligent review and consideration of all submitted comments.

On the FAFSA question regarding high school completion status, an applicant indicates if he or she has a high school diploma. In light of recent concerns about fraudulent high school diplomas, we encourage the Department to explore ways to assist schools in identifying fraudulent diplomas. For example, perhaps a question could be added asking the applicant to provide the name of the high school that granted the diploma and the date he or she received it.

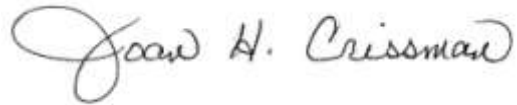
The draft paper FAFSA contains 13 questions that determine dependency status. We would encourage the Department to restructure this section to permit students to skip some of the dependency status questions. This would somewhat mimic the skip logic of FAFSA on the Web (FOTW) and would allow paper FAFSA filers to move through the form more quickly.

We have comments and concerns about some additional items on the draft paper FAFSA. Those comments are attached and are listed in page number order.

Department staff has done a good job of publicizing the planned enhancements to the 2010-11 FOTW. However, we've been told that the FOTW demonstration site (www.fafsademo.ed.gov), will not be available until mid December. This late time frame makes it difficult for the financial aid community to provide useful feedback in time for you to make any necessary or desired changes prior to the January 1, start-up date of the 2010-11 processing cycle. We understand that this was an extraordinarily busy year for FAFSA simplification. In future years, we would encourage you, if at all possible, to make the demonstration site available to the community at an earlier date.

We appreciate the opportunity to offer these comments and we look forward to working with you on these important application issues.

Sincerely,

A handwritten signature in cursive script that reads "Joan H. Crissman". The signature is written in black ink and is positioned below the word "Sincerely,".

Joan H. Crissman
NASFAA Interim President and CEO

Attachments: Comment table

NASFAA Comments on Draft 2010-11 FAFSA

Page	Item	Suggested Change (additions are shown in bold, deletions are in strikeout)	Comments
2	Notes for Q32	The Teacher Education Assistance for College and Higher Education (TEACH) Grant Program provides grants to students enrolled in a participating college who intend to teach in a high-need field in a public or private elementary or secondary school that serves students from low-income families.	Since teaching in a high-need field is one of the main eligibility criteria to receive a TEACH Grant, it should be mentioned in this brief description of the program.
2	Notes for Q35 and 82	In general, a person is eligible to file a 1040A or 1040EZ if he or she has taxable income makes less than \$100,000, does not itemize deductions, does not receive income from his or her own business or farm and does not receive alimony. A person is not eligible to file a 1040A or 1040EZ if he or she has taxable income of makes \$100,000 or more, itemizes deductions, receives income from his or her own business or farm, is self-employed, receives alimony, or is required to file Schedule D for capital gains , or claims the first-time homebuyer credit.	The suggested changes reflect current wording from the IRS 2008 Instructions for the 1040A.
4	27	When you begin the 2010-2011 school year , will you have your first bachelor's degree before July 1, 2010?	The suggested wording (similar to questions 28 and 29) will help to distinguish students who complete their baccalaureate degrees after July 1st and immediately begin a graduate program for the 2010-11 school year. As currently worded, these students

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			would answer NO, and may inadvertently be awarded undergraduate aid for a graduate program.
5	45i (same concept applies to 93i)	Other untaxed income not reported in items 45a through 45h , such as....	Additional wording is needed for clarification.
7	90	As of today, what is the net worth of your parents' investments, including real estate? Don't include the home you live in?. Net worth means current value minus debt. See Notes page 2.	Question mark should be changed to a period.
7	91	As of today, what is the net worth of your parents' current businesses and/or investment farms? Don't include a family farm or family business with 100 or fewer full-time or full-time equivalent employees. For a family farm or family business, see Notes page 2.	The added text is already included in the Notes for this question on page 2. However, we've received anecdotal reports that many family farms and businesses are erroneously included because applicants don't see the guidance about 100 or fewer employees on page 2.
9	Notes for Q53	Answer "Yes" if you were a dependent or ward of the court at any time since you turned age 13, even if you are no longer a dependent or ward of the court as of today. Incarceration does not qualify you as a ward of the court.	The added text is included on page AVG-28 of the 2009-10 <i>FSA Handbook</i> . FAFSA applicants also need to be aware of this guidance.