



March 2, 2021

The Honorable Dr. Miguel Cardona
U.S. Secretary of Education
400 Maryland Ave, S.W.
Washington, D.C. 20202

Dear Secretary Cardona,

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and the National College Attainment Network (NCAN), we extend a warm welcome as you assume the role of U.S. Secretary of Education. We look forward to working with you to improve the vital federal student aid programs that our members oversee every day and that their students rely upon. NASFAA represents more than 28,000 financial aid professionals who serve 16 million students each year at approximately 3,000 colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every 10 undergraduates in the U.S. and our partnership is vital to the millions of federal student aid recipients. NCAN represents over 500 college access programs, school districts, and institutions dedicated to increasing college access and success, with membership that serves over 2 million students annually.

There is one matter of acute need that requires your team's immediate attention: it is imperative that the changes to the Free Application for Federal Student Aid (FAFSA) and the underlying federal methodology formula mandated by Congress¹ in December of 2020 be implemented in an efficient and timely manner. More than 19 million students² complete the FAFSA each year, and this singular form serves as the gateway for students to receive billions of dollars in federal, state, institutional, and private scholarship aid. The changes made by Congress will greatly simplify the financial aid application process for students and expand Pell Grant eligibility to an estimated 500,000 more postsecondary students.

But time is of the essence. The law requires these changes to be implemented by July 1, 2023, which necessitates an aggressive implementation schedule. We urge you to make this a top priority in your administration and, to assist you in your assessment, we offer the following questions for your consideration:

1. **What is the roadmap for implementation?** The law requires these changes to be implemented by July 1, 2023, which means that they must be reflected in the FAFSA that becomes available October 1, 2022.
2. **What resources are needed for a successful implementation?** The implementation will be an enormous task, including major system modifications/updates, and will require commensurate and immediate resources from the Department of Education. The work required to implement the

¹ Consolidated Appropriations Act of 2021

² <https://studentaid.gov/about>

changes will be in addition to the effort already underway at ED to implement the data-sharing provisions included in the Fostering Undergraduate Talent by Unlocking Resources for Education (FUTURE) Act. Signed into law in December 2019, the [FUTURE Act](#) allows for the direct data sharing between ED and the Internal Revenue Service (IRS), and will simplify the FAFSA by having an applicant's financial information come directly from the IRS, rather than being manually entered.

- 3. What can be implemented early and how can there be iterative forward progress for students along this roadmap?** While complicated in their entirety, both the Consolidated Appropriations Act (CAA) and FUTURE Act contain certain provisions that may individually be implemented earlier and with more ease. For example, the CAA calls for the removal of the FAFSA questions about prior drug convictions and Selective Service registration, along with their tie to student eligibility. The law states these two provisions may be implemented early (prior to July 1, 2023); implementing these changes first is a way for ED to more immediately improve the FAFSA experience for students, and also show measurable progress toward overall implementation. Similarly, the FUTURE Act contains non-FAFSA related data-sharing provisions for income-driven repayment and total and permanent disability certification/recertification that may be implemented earlier than the 2023-24 award year. We urge the department to not put off a comprehensive rollout several years into the future, and instead focus on “wins” for students along the way.
- 4. How can NASFAA and NCAN be of help to you in this process?** Other than students themselves, there are no groups more invested in the successful launch of these initiatives than financial aid administrators and college access practitioners. A timely, smooth rollout is the only option. The challenge in front of us is daunting, but with the right focus, staffing, resources, and prompt attention, the community believes that ED can implement these changes successfully and efficiently, by the time the 2023-24 FAFSA is released on October 1, 2022. As a community, we stand ready to support ED through this implementation, through feedback, focus groups, user testing, and whatever else ED may deem helpful to the effort. We also stand ready to serve as advocates for securing any additional funding that may be necessary for ED to meet the statutory deadline.

We are grateful for your attention to this letter and look forward to working with your administration to make the process of applying for federal student aid less cumbersome for the millions of students these programs serve

Regards,



Justin Draeger,
President, NASFAA



Kim Cook,
Executive Director, NCAN