

# Congress of the United States

Washington, DC 20510

September 21, 2021

Secretary Miguel Cardona, EdD  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Dear Secretary Cardona:

Thank you for the work you are doing to improve education in the United States. Now, more than ever, it is critical that the Department of Education (Department) works to serve students and borrowers. Accordingly, we write today not only to commend your actions, but to urge you to provide appropriate relief to students pursuing higher education by extending the existing waiver of financial verification of most financial information (V1) from the Free Application for Federal Student Aid (FAFSA) for the 2021-22 award year.<sup>1</sup>

In July 2021, we were very pleased the Department announced that it was providing relief to millions of students when it put the waiver in place for the 2021-22 award year.<sup>2</sup> The COVID-19 pandemic has exacerbated family financial difficulties and placed a significant amount of stress on students and families. This relief was the appropriate step to address the needs of students while protecting the integrity of federal student aid by focusing on the most problematic categories of verification covering issues of fraud and identity theft (V4 and V5).

We write to encourage you to extend that waiver for the 2022-23 award year as soon as possible. When you extended this relief in July, you cited the ongoing global public health crisis and the challenges students and families were experiencing due to the pandemic as justification for this waiver. Now, COVID-19 cases, hospitalizations and deaths are on the rise across the country due to new variants of the virus and poor vaccination rates and mitigation efforts in some parts of the country. This will continue to impact the health and economic security of students and families for many months to come, which is why the administration should further extend this relief as it has done in other areas, such as the student loan repayment pause.

In addition to providing necessary relief during the global pandemic, this is also consistent with efforts to simplify and focus the FAFSA process more generally. Being selected for verification is an onerous event for students on top of an already overly complicated process to apply for financial aid, placing an additional burden on students to prove once again that they have financial need. Financial aid administrators and college access counselors also share in this burden. At a time when college enrollment and FAFSA completion rates are declining, it is critical that these professionals are able to spend the needed time to improve college-going, especially for the most vulnerable students.<sup>3</sup>

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<sup>1</sup> <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2021-07-13/changes-2021-2022-verification-requirements>

<sup>2</sup> <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2021-07-13/changes-2021-2022-verification-requirements>

This is also an issue of equity. Verification disproportionately affects low-income students, especially the 20 percent of Pell-eligible applicants from families with incomes so low that they do not file tax returns.<sup>4</sup> One recent analysis shows that students in majority-minority neighborhoods are selected for verification at a rate higher than those in majority white neighborhoods, a rate 1.8 times higher for students in majority-Black neighborhoods and 1.4 times higher in majority-Latino neighborhoods.<sup>5</sup>

Beyond burdensome, the current process is ineffective and inefficient. The federal government audits a significant share of students seeking financial aid, selecting approximately 25 percent of all FAFSA files for verification, compared to less than two percent of all federal tax returns.<sup>6</sup> Yet, recent data show that the verification process rarely results in a significant change to a student's grant amount. For example, in the 2018-19 award year, 72 percent of Pell Grant recipients selected for verification saw no change in their grant, and another 9 percent saw a change of less than \$500.<sup>7</sup> A more targeted approach would be more effective. In fact, those data show that the Department's prior efforts to improve verification helped to recover more federal dollars, even though fewer students were selected for verification.

As stewards of taxpayer dollars, we understand the importance of protecting the integrity of federal financial aid programs by preventing fraud and abuse. However, that goal should not come at the cost of the low-income students who need financial aid to pursue higher education. We applaud the current efforts to improve this flawed process, such as the passage and implementation of the FUTURE Act of 2019 and the FAFSA Simplification Act of 2020. Their eventual implementation should help to reduce the need for verification and improve the process of applying for financial aid. The Department should continue these efforts, but recognizing the continued public health crisis, it should also use its authority to waive the 2022-23 income verification requirements as soon as possible. Given the upcoming October 1 release of the FAFSA for the 2022-23 award year, the extension of the waiver is an urgent concern because students could be managing two separate verification processes for each award year, creating unnecessary confusion for students and increased burden on colleges and universities.

Thank you for your consideration of this request.

Sincerely,

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<sup>3</sup> <https://www.studentclearinghouse.org/blog/spring-2021-college-enrollment-declines-603000-to-16-9-million-students/>: <https://www.insidehighered.com/admissions/article/2021/07/19/report-fafsa-completion-fell-48-percent-year-ended-june-30>

<sup>4</sup> <https://www.ed.gov/news/press-releases/us-department-education-announces-temporary-changes-federal-aid-verification-process-2021-22-award-year>

<sup>5</sup> <https://www.washingtonpost.com/education/2021/02/07/fafsa-verification-black-latino-college-aid/>

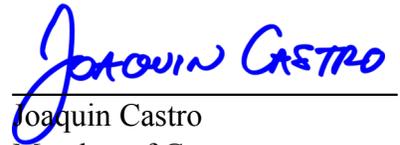
<sup>6</sup> <https://www.brookings.edu/blog/brown-center-chalkboard/2021/06/07/fafsa-verification-an-undue-burden-for-students-and-public-colleges/>

<sup>7</sup> <https://www.ncan.org/news/520984/NCAN-Conducts-First-Comprehensive-Review-of-Impact-of-Verification-on-Pell-Grant-Awards>

Handwritten signature of Robert P. Casey, Jr. in blue ink, written in a cursive style.

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Robert P. Casey, Jr.  
United States Senator

Handwritten signature of Joaquin Castro in blue ink, written in a cursive style.

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Joaquin Castro  
Member of Congress