



Question	Answer
Cross-Year Conflicting Information	
1. What types of conflicting information could be present between 2016–17 and 2017–18 FAFSAs?	Since both the 2016–17 and 2017–18 FAFSAs will be using income information from 2015, there is potential for conflicting information for any of the income-related fields on the FAFSA. Note that this will only be an issue for the first year of PPY implementation.
2. Is there any guidance about conflicting information from the 2016–17 year versus the 2017–18 year?	ED has released some guidance, and more guidance is forthcoming.
3. Can a comment code be created to identify if you have to look at the conflicting information?	From Q8 of EDs' Q&A posted on their early FAFSA page:
4. Is there a possibility that ED will offer schools safe harbors related to resolving conflicting information between the 2016–17 and 2017–18 years?	To reduce burden on both institutions and FAFSA applicants, the Department has developed a process where the Central Processing System (CPS) will, when processing an applicant's 2017–2018 FAFSA, perform an automatic review when there is also a 2016–2017 FAFSA on file for the applicant. This review will determine if there might be conflicting information between the two FAFSAs. The CPS will flag for institutional resolution only those 2017–2018 ISIRs where any potential conflict, once resolved, would have a significant impact on the student's 2017–2018 EFC. A Dear Colleague Letter is being prepared for release later this spring that will provide additional information on this subject.
5. Will schools be required to resolve cross-year conflicting information even if neither year's FAFSA is selected for verification?	
6. What if the conflicting information, once resolved, is found to significantly impact the year before that was already disbursed?	
7. What happens when the conflicting information is resolved and a student would be eligible for aid in a previous (and completed) award year?	
8. Are any of you considering encouraging all 2016–17 FAFSA filers, regardless of verification status, to use the IRS DRT now to avoid conflicting data for the 2017–18 FAFSA?	Yes, this is a recommended practice. The most effective way to prevent conflicting information from occurring is for the FAFSA applicant to use the IRS DRT when completing both their 2016–17 and 2017–18 FAFSAs.
9. If ED chooses to have schools resolve conflicting information in 1617 how will this impact October 1 FISAP submission?	This is unknown at this time. We are expecting ED to release operational details on resolving conflicting information in the near future.
Professional Judgment	
10. What year would schools use to process a PJ for a student?	When making PJ adjustments to data elements on the FAFSA, financial aid administrators may use any alternative 12-month period instead of the prior-prior year.
11. Private elementary and secondary school expenses and excessive medical expenses are allowable professional judgment (PJ) adjustments. Would one use the base year expenses (prior-prior year) or prior year?	

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Verification	
12. If a student/parent uses DRT for 2016–17 but does not use it for 2017–18, do we need to collect tax transcript or can we use 2016–17 data?	You can rely on the DRT data from the 2016–17 year.
13. Do we know the chances of a student that has been selected and verified for 2016–17 that the same student will be selected again for 2017–18?	No, we don't. ED does not publically release its verification selection criteria.
14. Any information as to whether verification groups will change for 2017–18?	The 2017–18 verification tracking groups were released in Dear Colleague Letter GEN-16-07.
15. About 30-35% of our applicants are selected for verification. With PPY do you anticipate fewer applications being selected for verification?	One of the benefits of PPY is expanded eligibility to use the DRT, which would hopefully ultimately lead to reduced verification burden for families and schools. NASFAA sent a letter to ED and the White House urging them to reduce verification burden and we are awaiting a response.
DRT	
16. Will PPY income information transfer from the 2016–17 FAFSA to the 2017–18 FAFSA in the renewal process?	No. There are too many possible scenarios where such pre-populating of income would result in incorrect information being included on the 2017–18 FAFSA. For example, there may be changes in dependency status, changes in marital status, professional judgment adjustments, etc.
17. Is ED going to require students/parents who stated they 'have filed' to utilize the IRS DRT?	Our understanding is that ED will continue to strongly encourage use of the DRT, but does not have plans to require it.
Timing Issues	
18. Our school will not have tuition costs determined until after February 2017 for the 2017–18 academic year. This impacts our ability to do early packaging for 2017–18 based on the new FAFSA timeline. What is your advice to schools like us?	We encourage schools to give their best estimates of amounts for tuition and fees, while clearly denoting that the numbers are estimates and could change.
19. Will Pell charts and/or campus-based funding allocation notifications be available earlier in the year for use in earlier packaging?	<p>At this point, there is no word on whether Pell Grant charts or funding levels for campus-based programs will be released earlier. NASFAA is working on this issue.</p> <p>For both of these items, there is some reliance on the time when Congress finishes the annual budget and appropriations process. The Department of Education (ED) cannot release final numbers until it knows how much Congress has appropriated to these programs. For award year (AY) 16–17, Congress finished the budget and appropriations process in December 2015.</p>

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19. (continued)	<p>In the case of Pell charts, we are aware of a second component that impacts the time of release. As specifically required by statute, ED determines the annual inflation-adjusted add-on to the Pell maximum from the Department of Labor Bureau of Labor Statistics (BLS) December report, which is released in mid-January. In 2016, the December BLS release came out on January 20. ED released the AY 16–17 Pell schedule shortly thereafter on January 29.</p> <p>NASFAA is exploring opportunities to work with both ED and Congress to work toward earlier availability for the sake of earlier packaging.</p>
20. Could origination fee changes due to sequestration ever be decided upon earlier?	<p>Sequester-driven origination fee changes are derived from the Office of Management and Budget’s (OMB) annual sequester report to Congress, which is required by law. The fiscal year (FY) 2017 report was released on February 9, 2016. This report sets percentage reductions for that fiscal year by spending type. Because student loans are “non-exempt nondefense mandatory programs,” they are subject to a 6.9% uniform rate for FY 2017. Direct Loans, TEACH Grants, and Iraq-Afghanistan Service Grants are all impacted.</p> <p>Though OMB published the rate in February, ED has yet to release information on changes in loan fees for Direct Loans and award reductions to TEACH Grants and Iraq-Afghanistan Service Grants for the upcoming award year. In FY 2016, OMB released its report on February 2, 2015, but ED did not publish guidance until April 23, 2015.</p> <p>At this time, we are unaware of any efforts from ED to release sequester-driven origination fee changes earlier.</p>
21. Due to the use of PPY, do you believe the Pell amounts for the Pell Chart would be the same between 2016–17 and 2017–18, as they would be based on the same tax year information?	<p>No, Pell amounts on the Pell charts are based on that year’s Pell Grant maximum award. Because of the annual statutory inflation-adjusted add-on to the Pell Grant maximum award, all Pell amounts will change annually in response to the new maximum award amount.</p>
22. Will the 2017–18 Federal Methodology tables be increased for inflation, being that it will still be 2015 tax year income on the FAFSA, not 2016?	<p>Yes, regardless of the tax year information provided, Section 478 of the Higher Education Act, as amended, requires annual updates to the Income Protection Allowance (IPA), the Adjusted Net Worth (NW) of a Business or Farm, the Education Savings and Asset Protection Allowance, and the Assessment Schedules and Rates.</p>

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23. Will EDExpress for the new year be available earlier?	This is unknown at this time. NASFAA and others have communicated to ED that many FSA operational products and publications will need to be released several months earlier.
Miscellaneous	
24. Will the Task Force be soliciting information to determine trends regarding the number of schools who may be accelerating their award notification processes?	Yes, please stay tuned for future requests for feedback from the task force.
25. Can you provide more information about the Competitors' Worksheet you mentioned?	The Competitors' Worksheet is still under development by the NASFAA PPY Task Force. Stay tuned to <i>Today's News</i> for an announcement of its availability.
26. You mentioned NASFAA producing a video on PPY, when do you think that will be available and to whom will that be made available?	Our latest video has now been released and is available to the public.
27. How much coordination has been done with the IRS and what is the thought process should line item references change on the 2016 basic tax returns?	ED has been working closely with the IRS on the implementation of PPY. It is not uncommon for Congress to make last-minute changes to line items on federal tax returns. Using PPY will lessen the impact of these last-minute changes, since the FAFSA will be referencing the prior-prior year's tax return.
28. Does the student have the option to use the current year income as opposed to the previous years' income?	No. The FAFSA will request prior-prior year income information for all applicants. Under professional judgment, a school can change the income data elements to reflect an alternative 12-month period if special circumstances exist.
29. How can I access the FAFSA draft?	The 2017–18 draft FAFSA can be found on regulations.gov , under docket ED-2016-ICCD-0036-0002. Comments are accepted through May 31, 2016.
30. A dependent student files the 2016–17 FAFSA with parent information. Now, when completing the 2017–18 FAFSA, the student is independent. What income should he include on the FAFSA?	Prior-prior year does not change whose income information is reported on the FAFSA. If a student is independent, then the student would report his or her income and his or her spouse's income, if applicable.
31. Would be really helpful to have sample letters to send to students and parents to communicate this change so that we can send early in the summer.	Helpful resources related to PPY, including same text for various audiences provided by ED, can be found on NASFAA's PPY web page .
32. Is there any type of handout on PPY we can share with high school counselors now? They are asking for this to share with junior families.	

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FAFSA Information Sharing	
<p>33. Where we can find the federal statute regarding the FAFSA information not being used for admission decisions?</p>	<p>HEA 483(a)(3)(E) states: (a) COMMON FINANCIAL AID FORM DEVELOPMENT AND PROCESSING (3) ELECTRONIC FORMAT (E) PRIVACY – The Secretary shall ensure that data collection under this paragraph complies with section 552a of title 5, United State Code, and that any entity using the electronic version of the forms developed by the Secretary pursuant to this paragraph shall maintain reasonable and appropriate administrative, technical, and physical safeguards to ensure the integrity and confidentiality of the information, and to protect against security threats, or unauthorized uses or disclosures of the information provided on the electronic version of the forms. Data collected by such electronic version of the forms shall be used only for the application, award, and administration of aid awarded under this title, State aid, or aid awarded by eligible institutions or such entities as the Secretary may designate. No data collected by such electronic version of the forms shall be used for making final aid awards under this title until such data have been processed by the Secretary or a contractor or designee of the Secretary, except as may be permitted under this title.</p>