



November 17, 2023

Richard Cordray  
Chief Operating Officer  
Federal Student Aid  
U.S. Department of Education  
400 Maryland Avenue, S.W.  
Washington, D.C.

Dear Mr. Cordray,

Given Federal Student Aid's (FSA) recent announcement that the Free Application for Federal Student Aid (FAFSA) will be available by December 31, [1], there is an increased urgency to ensuring that all the steps that follow an applicant completing the form will operate smoothly and quickly. In order to meet that goal, I write on behalf of the undersigned associations to request that FSA more closely engage with the higher education community regarding pending changes to the FAFSA.

It is important to recognize the hard work FSA has done so far, not just in implementing the new form and associated system changes, but in outreach to stakeholders. Our members appreciate the information FSA has provided throughout the implementation process, and the genuine efforts made to keep campuses aware of progress. However, as we approach the arrival of the form by December 31, we ask that these efforts be greatly expanded.

As noted in our October 13 letter, "every day counts when it comes to supporting students and families through the new process." [2] We know all too well that the release of the application form is only the start of the complicated process of determining eligibility for, and then providing, federal student aid. That process requires careful attention to shifting student circumstances and regular interactions with relevant campus staff on the part of each institution's financial aid office.

With that in mind, we ask that FSA, first and foremost, provide greater clarity about how the changes being enacted will impact the processes that follow an applicant completing the form. We urge FSA to work directly with experts in the field now, both on and off campuses, to identify possible problem areas and develop approaches in response to minimize negative impacts on students, institutions and states. While we are encouraged by FSA's stated goal to "provide targeted support to under-resourced schools through special training sessions and technical assistance, including guidance and training for communicating with vulnerable student populations," [3] much more can be done to prevent systemic problems

that may occur both at FSA, on campuses and within states as the new system launches. The more information that can be shared regarding the implementation and timeline of the new FAFSA and associated processing systems, the more prepared the higher education community can be to ensure the best experience for students enrolling in and persisting through postsecondary education.

While we are pleased that FSA will meet the statutory deadline for the application to be available, institutions cannot begin the important work of determining student eligibility until they receive applicant information later in January. It is critical that institutions not become the unauthorized middleman for delayed FAFSA processing. We ask that ED's communications to applicants clearly explain that while their applications have been received, they have not been processed by the Department of Education; what that means in terms of their institutions' ability to determine their eligibility; and any recommended steps students might take to work with their institutions. In addition, we would like to explore what space the Department can provide institutions to focus their efforts on processing FAFSAs and packaging students over the next several months given these truncated timeframes, including but not limited to decreasing the number of students selected for verification.

There is a wealth of expertise available from a broad range of stakeholders who are deeply invested in seeing FAFSA changes implemented as quickly, smoothly, and effectively as possible. We ask that you utilize this resource and actively involve the full range of stakeholders in anticipating and resolving possible problems that may arise under the start of the new FAFSA process.

We thank you for your attention to this letter and are eager to work with you in the best interests of students and institutions.

Sincerely,



Ted Mitchell  
President

cc: James Kvaal, Melanie Storey, Melanie Muenzer

On behalf of:

American Association of Community Colleges  
American Association of State Colleges and Universities  
American Council on Education

Letter to FSA on FAFSA Implementation  
November 17, 2023

Association of American Universities  
Association of Public and Land-grant Universities  
National Association of Independent Colleges and Universities  
National Association of Student Financial Aid Administrators

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[1] Federal Student Aid. (2023, November). Update on the Simplified, Streamlined, Redesigned 2024-25 FAFSA. U.S. Department of Education. <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-11-15/update-simplified-streamlined-redesigned-2024-25-fafsa>

[2] American Council on Education. (2023, October). Letter to ED on FAFSA Release Date. <https://www.acenet.edu/Documents/Letter-ED-FAFSA-Release-Date-101323.pdf>

[3] U.S. Department of Education. (2023, November). U.S. Department of Education Releases New Data Highlighting How the Simplified, Streamlined, and Redesigned Better FAFSA® Form Will Help Deliver Maximum Pell Grants To 1.5 million More Students. <https://www.ed.gov/news/press-releases/us-department-education-releases-new-data-highlighting-how-simplified-streamlined-and-redesigned-better-fafsa%C2%AE-form-will-help-deliver-maximum-pell-grants-15-million-more-students>