



The Honorable Miguel Cardona
Secretary U.S. Department of Education
400 Maryland Avenue SW Washington, DC 20002

July 23, 2024

Dear Secretary Cardona,

Releasing the FAFSA on October 1 has long been a top priority¹ for our organizations because delays come with consequences - particularly for those students who most need financial aid to access college. When the FAFSA operates as intended, an earlier release date allows more students to receive support completing the form and enables colleges and universities to provide financial aid information to students much sooner. This year's delay has resulted in a 10.9% decrease² in FAFSA completions among high school seniors relative to the class of 2023 so far, a decline that could have significant ramifications for college enrollment in the fall of 2024.

But the launch date is only a piece of the puzzle. It's also essential that the form be fully functional, reliable, and predictable for all students - no matter how complex their circumstances - from the first time they log on until they receive their financial aid offers. Specifically, that means FAFSAs are processed quickly and accurately, schools and state aid agencies receive them within one to three days of the student completing the form, applicants and schools can make corrections, and students and contributors can securely attain an FSA ID. It also means communication and training materials and a timeline for release are made available well in advance so that the college access field can schedule FAFSA completion events and postsecondary institutions can ready their systems to receive processed FAFSAs, set deadlines, and prepare financial aid offers.

Developing a smoothly functioning system requires significant testing aimed at identifying all issues that might arise – from problems students may encounter while filling out the form to problems with processing to problems making corrections and ultimately making financial aid offers. This testing process cannot be shortchanged or skipped, or we will experience a repeat of this year – a never-ending game of whack-a-mole where workarounds are substituted for a holistic solution.

As we quickly approach the traditional start of the 2025-26 FAFSA application year, October 1, we are wrestling with the trade-off between timeliness and functionality and have concluded that the


consequences of releasing a product that does not come with full end-to-end functionality for students, families, state agencies and aid administrators would be too great. We would strongly prefer Federal Student Aid to conduct the necessary testing to ensure a reliable, functional FAFSA - even if doing so requires delaying the release date to as late as December 1 - while being fully transparent about the timeline in advance. Meeting deadlines is critically important; just as important is transparency about when deadlines will not be met.

At the same time, it would be untenable for students and schools to start the 2025-2026 financial aid process in 2025. In a typical year, 50% of FAFSAs filed by seniors are completed before January 1 of the preceding school year. Fall has long been a vital time for college access counselors to support students through the FAFSA, and we have all seen firsthand the devastating impact of delay throughout the 2024-2025 award cycle. We would like to work with you to support a timely release of a functioning FAFSA in any way needed. Thank you for your attention to this issue.

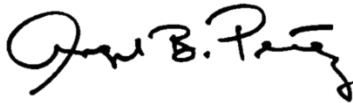
Sincerely,



Beth Maglione
Interim President and CEO
National Association of Student Financial Aid
Administrators (NASFAA)



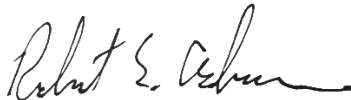
Kim Cook
CEO
National College Attainment Network (NCAN)



Angel Perez
CEO
National Association for College Admission
Counseling (NACAC)



Jennifer Lanphear
President
National Association of State Student Grant &
Aid Programs (NASSGAP)



Robert Anderson
President
State Higher Education Executive Officers Association (SHEEO)