

Question	Answer
Information and Collaboration	
Will there be any PPY sessions at the NASFAA conference?	Yes:
	Prior-Prior Year from the Admission Perspective Update from the National Association for College Admission Counseling (NACAC) on PPY implementation from the school counseling and college admission perspectives.
	Prior to PPY Lawrence University shares its experiences using PPY in 2016-17 to award institutional aid to incoming students, including the timing of receiving documents and making awards, how PPY data in Institutional Methodology (IM) compared with the prior year data in Federal Methodology (FM), and the impact of PPY on professional judgments.
	PPY Implementation Task Force Update On September 14, 2015, President Obama announced that the Department of Education (ED) will use prior-prior year (PPY) income data for financial aid purposes beginning with the 2017- 18 award year. As a result, NASFAA formed a task force to identify potential roadblocks to successful implementation and develop strategies to overcome those barriers. This session will provide an overview of their work so far. The task force continues to collaborate with ED to help ensure a successful PPY rollout, and will also conduct a post-mortem after the first year of PPY to deliver final recommendations on the evolution of PPY going forward.
	Is Your Campus Ready for PPY? Beginning in October 2016, prospective students will be able to submit their FAFSAs using information from an already completed tax return and could, consequently, have knowledge of financial aid eligibility earlier in the college admissions process. However, how early institutions will be able to take advantage of this change in the financial aid process will be largely dependent on interactions between the Department of Education and software developers as well as campus offices such as information technology, admissions, and financial aid. This session will provide recommendations on how to best position your institution for the move to Prior-Prior Year and the Early FAFSA.



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2.	Will you be doing any additional PPY webinars?	Yes, we will be doing additional PPY webinars. The topics are undecided at this point, and will likely be determined on an asneeded basis. However, there will almost certainly be a webinar devoted to the conflicting information guidance, once it is fully received.
3.	What is the TF working on now?	The task force will be meeting in-person at the conference to discuss their work-plan going forward. You can continue to expect additional tools and analysis, including polls, surveys, and webinars. In addition, the task force will continue to work after the implementation of PPY to follow-up on any issues or items that need to be addressed post-mortem.
4.	Is NASFAA working with other stakeholders on PPY issues, such as the admissions association, ED, College Board, college access organizations, etc.?	Yes. NASFAA regularly attends meetings of various groups to facilitate not only PPY but continued improvement and simplification of the FAFSA and the need analysis and aid delivery systems.
5.	Is ED going to issue any public service announcements (even TV advertisements) about implementing PPY? What are they doing to get the word out? Or, is the burden of this task going to fall back upon the financial aid offices?	ED has been active on its social media accounts educating students about PPY. ED has also developed a number of counseling tools for FAAs to use, including presentations and social media resources at: <a href="https://financialaidtoolkit.ed.gov/tk/">https://financialaidtoolkit.ed.gov/tk/</a> ED publications that may be of particular use include a listing of resources for the 2017-18 FAFSA <a href="https://financialaidtoolkit.ed.gov/resources/federal-student-aid-resources-for-fafsa.pdf">https://financialaidtoolkit.ed.gov/resources/federal-student-aid-resources-for-fafsa.pdf</a> , and informational handouts about 2017-18 changes for college students and parents <a href="https://studentaid.ed.gov/sa/sites/default/files/2017-18-fafsa-updates-students-parents.pdf">https://studentaid.ed.gov/sa/sites/default/files/2017-18-fafsa-updates-students-parents.pdf</a> and for counselors and mentors <a href="https://financialaidtoolkit.ed.gov/resources/2017-18-fafsa-updates-counselors.pdf">https://financialaidtoolkit.ed.gov/resources/2017-18-fafsa-updates-counselors.pdf</a>
6.	What conversations are taking place between NASFAA and the department about the impact of PPY on Institutional Aid Awarding?	Issues relating to institutional aid awarding generally fall out of ED's purview. NASFAA encourages schools to discuss issues like these with institutional colleagues at similar schools.
7.	Will the FSA conference time change in future years given PPY?	It is NASFAA's understanding that the timing of the FSA conference will not change. Most conferences that size must be booked and contracted at least a couple of years in advance. The current timing avoids conflicts with other events and institutional schedules, and allows ED to address issues and challenges that have been uncovered earlier in the processing/awarding/disbursing cycle.



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8.	Have many states shared what they will do with College Goal Sunday (CGS)? Will they move to the fall? Not have them anymore?	The National College Access Network (NCAN) coordinates the CGS program. NCAN points out that CGS is a very decentralized program with each state operating autonomously and responding to local circumstances, which may include state aid deadlines, local institution deadlines, and other factors. NCAN has recommended to CGS programs that they adjust the timing of their programs to coincide with early FAFSA. As of late June 2016, several programs have indicated that they are doing so; none has said that they are not. Anyone interested should contact the CGS program in their state to learn about relevant changes.
Timing and Awarding		
9.	When will the 2017-18 Pell Charts be available?	At this point, there is no word on whether Pell Grant tables will be released earlier, in part because Department of Education must know how much Congress has appropriated before doing so. For example, for award year (AY) 16–17, Congress finished the appropriations process in December, 2015.  In addition, the law requires ED to determine an annual inflation-adjusted add-on to the mandatory portion of the Pell Grant, based on the most recent calendar year ending prior to the beginning of that award year (2016 for the 2017-18 award year). For 2016-17 Pell schedules, the Bureau of Labor Statistics released the relevant data on January 20, 2016. ED released the AY 16–17 Pell schedule shortly thereafter on January 29.
		However, a bill has been introduced that would move this determination up by timing the inflation adjustment to the end of the previous fiscal year (September 30) rather than the end of the previous calendar year.



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Are most schools going to award without the release of the Pell chart?	The task force has reached out to membership to ask a series of one-answer questions and has been posting the results for membership. The task force will likely survey membership later in the fall or early next year so results will be captured after schools have made the determination of how they are handling the transition.
Is it anticipated that most upperclass awards will remain in the similar timeframe they are now or will there be movement there as well?	
12. Would love a cumulative list of colleges than plan on moving FAFSA priority deadline dates for freshmen or upperclassmen.	Also, the Sector Caucus events scheduled for Sunday, July 10 as part of NASFAA's annual conference will present an opportunity for members to discuss their plans and timetables for implementing PPY. We encourage members to attend and participate in these forums to hear how their colleagues plan to manage the transition to PPY.
13. Is NASFAA considering a survey to determine which schools might be changing admissions or financial aid deadline dates in light of PPY?	
14. Looking forward to a survey, as knowing which 4-year colleges will be using 2016-17 year Pell Charts vs waiting until spring to use 2017-18 charts will help community colleges when counseling our students who are transferring out to four-year colleges.	
15. What ideas do schools have to reduce the melt rate since we expect a longer timeframe between awarding and matriculation?	
16. We are a quarter school and are concerned about the convergence of the new early FAFSA date with the start of our fall quarter and the FISAP deadline. Have there been any discussions on the task force about how the early FAFSA will affect the staffing and technical resource requirements on campuses?	
17. How is NASFAA encouraging colleges and universities to move up their admissions decisions dates? PPY does not help students if admissions decisions are not being made until late spring.	It is important to note that the benefits of PPY extend beyond the opportunity for early admissions and financial aid decisions. PPY simplifies the financial aid application process, allowing more families to use the IRS Data Retrieval Tool because most tax filers have completed their prior year's tax returns by October. Fewer families will need to use estimated tax information on their FAFSA, reducing the need to file subsequent corrections.
	Although early admissions notifications could complement PPY, NASFAA feels that decision is best left to individual institutions. With regard to acceptance of offers of admission, NASFAA encourages schools to take advantage of the opportunity PPY affords to give students and families more time to make informed decisions.



Answer			
In Early FAFSA Electronic Announcement #2 (February 2016), ED states that it is working with software providers to ensure that they have the information they need and, if they do not, they know how to contact ED for additional information or to provide clarification on an issue.  The task force has a sub-group devoted to software vendor issues and is happy to pass along software vendor concerns to ED.			
	Tools and Resources		
	We appreciate that feedback and will take back to our web design team.		
The PPY Toolkit is located under the "Tools & Resources" tab on the NASFAA website: <a href="https://www.nasfaa.org/ppy_toolkit">https://www.nasfaa.org/ppy_toolkit</a>			
Transition Year Issues			
ED has released some guidance, and more is forthcoming. From Q&A #8 of EDs Q&A on ED's early FAFSA page: "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."			
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25. If someone uses IRS data import in 2016-17 why can't the data populate for 2017 18?	ED has stated that 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.	
26. Do you anticipate any issues specific to community colleges versus universities or private institutions?	Community colleges tend to serve more nontraditional students than do other institutions, and tend to have more late applicants, walk-ons, transfers, and students who remain employed. PPY should work for all of these populations, though special circumstances may differ.  Members who are attending the NASFAA annual conference	
	may participate in their sector forum on Sunday, July 10 to hear how their colleagues plan to manage the transition to PPY.	
Professional Judgment		
27. Does NASFAA have any suggestions on how to handle a "reconsideration of need" process now that income figures will be 2 years old? I am guessing this might come up more.	The same principles currently applicable to PJ will continue to apply: PJ must be exercised on a case-by-case basis, due to extenuating circumstances that distinguish the applicant from other applicants.	
28. If PJ is exercised on a 2017-18 FAFSA (after the 2015 income is used initially) is only the 2016 income able to be used or will the current year 2017 income be able to be used?	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.	
FAFSA Completion and Verification		
29. Can we use DRT information in 16/17 to verify 17/18 information?	You can rely on data from 2016-17 provided 2016-17 data was not changed after tax information was retrieved from the IRS using the DRT.	
30. Does the ISIR have to show the DRT used for that aid year or if the previous year's ISIR shows DRT you are okay to use that for verification processes for 1718?		
31. If we ask students to use IRS Data Retrieval for 2016-17 and the student has not been selected for verification, will they now be selected for verification?	ED does not publicly release its verification selection criteria, but it is possible for a student who used the IRS-DRT to be selected for verification, for example, on the basis of non-dollar items.	



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32. What happens if they can use the DRT for 16-17, but are unable to use it for 17-18 (perhaps they amended their tax return after they used the DRT the prior year)?	If a family cannot use the DRT for any reason they should manually enter their tax information following the instructions on the FAFSA. If selected for Verification the family will need to provide the financial aid office with an IRS tax transcript.
33. If you completed verification for a dependent student for 2016-17 and they are selected again and the student did not file taxes, students will have to go get the non-filer document to complete verification for 2017-18. Right?	GEN-16-07 states that for 2017-18 FAFSAs, "Nontax filers and tax filers who received an extension but still have not filed their income tax return must provide confirmation of nonfiling dated on or after October 1, 2016."
	Note that schools only need to request the Verification of Nonfiling Letter from the IRS if someone whose data are required on the FAFSA submits a signed statement claiming nonfiler status and the FAO has reason to believe that person would have been required to file a U.S. tax return. See 2016-17 FSA Handbook, p. AVG-83.
34. If a parent wasn't married prior-prior year but gets married prior year and is selected for verification lists new spouse on HH form wouldn't we need new spouse income info from prior/prior year?	It depends on when the marriage took place, but use of PPY does not change the current rule: If a dependent student's parent wasn't married in 2015 but is married when the application is signed, income and asset information must be provided for the new spouse. If the parent remarries between application and verification, household size must be updated but the student would not count the new stepparent's income and assets unless the school uses professional judgment to include the stepparent's income or to otherwise account for the change. See 2016-17 FSA Handbook, p. AVG-90.
35. What happens if parents are married during the 2015 tax year, but separate/get divorced when FAFSA is being completed. How is this handled?	Use of PPY does not change the current rule: If a student or their parent was married in 2015 but is separated or divorced or the spouse has died when the application is signed, the student or parent doesn't provide income and assets for that spouse even though the information may be on the 2015 tax forms. See 2016-17 FSA Handbook, p. AVG-31.
36. Are there going to be more items included in the DRT than in the past?	NASFAA believes ED is exploring the possibility of using DRT to the greatest extent possible but does not have any specific information about upcoming changes to the items to be included in the DRT.
37. Is NASFAA working with ED to have the IRS transcript available on the IRS website and not just by mail?	This feature was recently restored. According to the IRS website, a tax filer can view, print, or download a transcript from the IRS site at: <a href="https://www.irs.gov/individuals/get-transcript">https://www.irs.gov/individuals/get-transcript</a>