

Item 10

Information Item

Update on the 2017-18 FAFSA release on October 1, 2016

SUMMARY OF THE ISSUE(S):

This item provides updates on the topics related to the 2017-18 Early Free Application for Federal Student Aid (FAFSA) and Prior-Prior Year (PPY) initiative and its impact to the California Student Aid Commission (Commission) programs and workload.

On October 1, 2016, the 2017-18 FAFSA application period will begin. Families will have more time to complete the application and will be able to use 2015 tax year data. These two changes will make it much easier for families and their students to complete and submit the FAFSA allowing them to apply for various forms of federal and state financial aid. Additionally, this FAFSA year will be the first in which a student's list of schools on their ISIR (Institutional Student Information Report) will not be provided to institutions nor will they be listed in priority order.

Commission staff continue to host Early FAFSA PPY workgroup meetings with representatives from the high schools, colleges and segmental offices. The Early FAFSA PPY workgroup is making every effort to assess all the impacts of the FAFSA changes on the Commission's programs and current processes. Based on these changes, new processing deadlines have been established and communicated to external stakeholders. In addition, Commission staff are reviewing the application and award processes to modify all programming changes necessary to update the Grant Delivery System (GDS).

The changes required by the earlier start of the FAFSA application period and PPY provide technical and administrative challenges to high schools, colleges, segmental offices and Commission staff. For itself, Commission staff is cautiously optimistic that it will be able to identify, develop and complete new administrative processes and information technology projects needed to implement the necessary changes to provide students with earlier information about their potential eligibility for financial aid.

RECOMMENDATION:

Staff recommends to continue evaluating the administrative priorities to implement changes for the Early FAFSA PPY initiative and make every effort to identify all modifications to the GDS that could impact the October 1 timeline. Updates, issues and potential risks related to the October 1 the implementation will be communicated regularly to the workgroup, other stakeholders and the Commission.

California Student Aid Commission

BRIEF HISTORY OF KEY ISSUE(S):

Currently the FAFSA application period begins on January 1st of each year and the financial information collected on the FAFSA is from the tax year immediately preceding the award year for which the student is applying. In September 2015, the White House stated that requiring students to wait until January, slows down the financial aid process and makes it difficult for prospective students to determine whether they can afford to go to college. By having the FAFSA available earlier, students will be able to complete their financial aid applications in the same timeframe as their college admissions applications. Subsequently, President Obama announced the following significant changes starting with the 2017-18 FAFSA application year and going forward:

- **Earlier FAFSA submission period:** The application period will begin on October 1 of each year instead of January 1. This means that the 2017–2018 federal FAFSA application period will extend from October 1, 2016 through June 30, 2018. However, the March 2nd deadline still applies to Cal Grants and California Dream Act Applications (CADAA). Thus, the 2017-2018 California application period will extend from October 1, 2016 through March 2, 2017. The earlier and longer timeframe for the FAFSA and CADAA will allow applicants more opportunities for a Cal Grant award.
- **Earlier income and tax information:** Students will report income information from an earlier tax year (PPY). For example, on the 2017–18 FAFSA, students (and parents, as appropriate) will report their 2015 income information, rather than their 2016 income information. Using PPY information will no longer impede students from the application process by using estimated tax information and correcting it later on. Applicants can also utilize the IRS data retrieval tool to automatically import the tax information into the FAFSA. The table below shows that 2017-18 FAFSA and CADAA applicants will use the already filed 2015 tax information.

When a Student Is Attending College (School Year)	When a Student Can Submit a FAFSA	Which Year's Income and Tax Information Is Required
July 1, 2015–June 30, 2016	January 1, 2015–June 30, 2016	2014
July 1, 2016–June 30, 2017	January 1, 2016–June 30, 2017	2015
July 1, 2017–June 30, 2018	October 1, 2016–June 30, 2018	2015
July 1, 2018–June 30, 2019	October 1, 2017–June 30, 2019	2016

- **Student information protection on the FAFSA:** An Institutional Student Information Records (ISIR) is an electronic record containing valuable student information reported on the FAFSA that is used by colleges and state agencies to determine financial aid. During the 2016-17 FAFSA year, the US Department of Education (USDE) restricted the list of colleges on a college's ISIR to the college receiving the ISIR. This decision was based on concerns that colleges were using the list of colleges from a student for reasons unrelated to the awarding of student financial aid. State agencies, however, would continue to receive the full college list. For the 2017-18 year, the USDE took another step to protect student information by no longer listing student college choices in priority order for state agencies.

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These three dramatic changes for the 2017-18 FAFSA year are steps taken by the USDE for FAFSA simplification that aligns the financial aid process to be more student centered.

ANALYSIS:

An internal workgroup consisting of staff from the Program Administration Services Division (PASD), Information Technology Services (ITS) and the Communications manager was formed to strategize, plan and prepare the Commission to implement these upcoming changes by October 1, 2016. The workgroup has identified the following areas to address the three major changes described above and be ready by the October 1st FAFSA release.

1. Grant Delivery System Readiness

The most critical component for meeting the October 1 date without delay is preparing the current Grant Delivery System (GDS) in time. The (GDS) does not have the capacity to open three concurrent academic years. As a result, the 2015-16 academic year will need to close earlier to accommodate the earlier opening of the 2017-18 academic year.

Earlier Year-End Reconciliation means:

- Award processing for the 2015-16 academic year will end on June 30, 2016. This will give schools and Commission staff a period of three months to perform corrections, adjustments, and payments prior to the 2015-16 year-end reconciliation.
- The 2015-16 reconciliation deadline is September 9, 2016. The date was moved up from last year's November 19th date, to accommodate the opening of the 2017-18 academic year.
- Institutions will need to reconcile their Cal Grant accounts two months earlier during an already busy season. Institutional representatives and the California Community College Financial Aid Administrators Association (CCCSFAAA) have expressed concerns about meeting the September 9 deadline.

In addition to the earlier reconciliation, staff from PASD and ITS will need to coordinate, plan and update the GDS for the opening of the new academic year. The following are a few of these tasks:

GDS updates needed:

- Update hundreds of tables with new academic year information.
- Align any federal changes to the ISIR, records layouts and system configurations to the GDS
- Run awards simulations and test any new updates.

The final piece to GDS readiness is the early release of the CADAA. As the state processor since 2012, the Commission is responsible to ensure that the dreamer population have a financial aid

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application similar to the FAFSA for state and institutional aid consideration. Each year, Commission staff is dedicated to make the following updates:

CADAA updates:

- Align any pertinent FAFSA updates to the CADAA.
- Update important documents like the Cal ISIR layout, comment codes and Cal SAR reports
- Update application interface including help text, skip logic and questions.

Year-end processes such as reconciliation, GDS updates and CADAA improvements are procedures that normally run in November and December are now being pushed up to September to accommodate the October 1 date. With an already busy fall season, these earlier processes will add to staff workload and GDS capacity.

2. GPA Expanded Processing Window

For the early FAFSA initiative to be truly successful in California, it is imperative that the Commission make early Cal Grant award offers for prospective college freshmen before the college application deadline at the end of November. Hence, the early Cal Grant award cycle hinges upon high schools submitting the 2017-18 Grade Point Average data to the Commission during the October to November window. To that end, the Commission plans to open the GPA submission portal sooner than other years. However, providing GPAs electronically and as the school year is beginning could provide challenges to some high schools. Some other GPA points to consider:

- The 2017-18 Grade Point Average (GPA) upload cycle is targeted to begin as early as June 2016 and continue through March 2, 2017.
- With the passage of Assembly Bill (AB) 2160 (Chapter 679, Statutes of 2014), all public high schools and charters are required to electronically submit GPAs, without social security numbers, for their seniors by the March 2nd deadline.
- During the April 7, 2016 Student Impact Committee meeting, staff informed the Commission that language was provided to the Legislature, which would amend AB 2160. The language would change the opt-out dates, mandating high schools to notify students during their junior year that their GPA would be submitted by October 1 of their senior year. The goal with this change is to encourage earlier GPA uploads, which could yield earlier award notifications.

3. School of Attendance Confirmation Process

As mentioned earlier, the USDE will randomize the college-choice listing which will eliminate the priority order. Currently, the Commission offers a student's Cal Grant award to the college (school) the student is most likely to attend (SMLTA). The SMLTA is the college the student lists first in the college choice section of the FAFSA or CA Dream Act application. These changes will require developing new IT solutions to the Cal Grant awarding and payment process. With the earlier

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application period, some significant system changes need to take place to align with the President's intent to inform students of their financial aid options as early as possible, such as preparing to release the CA Dream Act application (for AB 540 students) on October 1 to mirror the FAFSA. The following is the proposed new process for confirming college of attendance:

- After the GDS processes a FAFSA or Dream Act application and a qualifying GPA, the student will be notified through an Initial Cal Grant Award Notification letter (attached) displaying the maximum award amounts for which the student may be eligible at the different segments.
- The initial communication will also inform them about other aid and advise the student to open a WebGrants for Students account to select the college they will attend. This not only encourages the student to get involved in managing their Cal Grant award online, but will also allow the Commission to place the student on the correct payment roster based on their final college choice.
- Once the student selects the college of attendance, they will receive a California Aid Report (CAR) confirming the Cal Grant award at the school they have selected. Students who take no action after receiving the Initial Cal Grant Award Notification may be claimed by colleges at a later date.

Many of other states have expressed concerns over the randomization of the college list and have requested that the USDE reconsider this decision. The National Association of State Student Grant and Aid Programs (NASSGAP) submitted a letter to the Under Secretary of Education, Ted Mitchell to reverse its decision and continue to send the FAFSA college list in priority order. The Executive Director sent a letter to the Under Secretary that identifies the need for the Commission to continue receiving the list of colleges, but does not oppose the randomization of the list.

Although the early FAFSA initiative presents challenges as documented above, Commission staff recognizes the benefits for assisting students and families with early financial aid information and have the necessary steps to prepare the agency for the October 1 date. Beginning in late October or early November, Commission staff anticipate processing early financial aid information notifications to high school entitlement applicants who have submitted a completed 2017-18 FAFSA or Dream Act application and have an eligible GPA submitted by their high school.

Early FAFSA PPY Workgroup and Partners

Staff's communication with external stakeholders continues. Most recently, external stakeholders worked with Commission staff to develop an agenda based on topics they found were in need of further discussion and clarification. On April 27, 2016, staff presented two webinars which highlighted the topics requested. The topics were GPA submission, outreach, and the California Aid Report (CAR). The first webinar was presented to 31 attendees from the high schools. The second webinar was presented to 76 attendees from the colleges.

Commission staff recognizes that a communications campaign is vital to the success of early FAFSA and PPY. Consistent with those efforts, a partnership with the Intersegmental Coordinating Committee (ICC) of the California Education Round Table was established to develop materials for the Early FAFSA and PPY. These materials can be distributed to students and families and used by high schools and colleges to promote the Early FAFSA or California Dream Act application to high

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school juniors, encouraging them to begin filing the FAFSA on October 1, 2016. The ICC's partnership will assist the Commission in informing families and their students about the benefits of filing the FAFSA or California Dream Act application early.

In addition, Commission staff has partnered with the California Department of Education (CDE) to strengthen communications to districts and high schools. Commission staff meets monthly with the CDE to discuss the promotion the Early FAFSA.

Finally, staff is developing a communications plan for Early FAFSA and PPY that incorporates partnerships with other organizations and the media.

Conclusion

The Early FAFSA PPY initiative will directly benefit students and families as they plan and prepare for college. Students and their families will have more time to resolve any income verification requirements or supplemental request from their campus financial aid offices. Getting federal and state aid eligibility earlier will allow students and families to understand better each institution's cost information and make more informed decisions about which school is best for them.

The Commission staff is revising administrative priorities to implement changes for the Early FAFSA PPY initiative and looks forward with cautious optimism to the initial year of earlier information to students about their eligibility for financial aid. Based on the significant changes to the early FAFSA, the Commission staff is making every effort to identify all modifications to the GDS that could impact the October 1 timeline. Updates and issues related to the October 1 Cal Grant processes will be communicated regularly to the workgroup and other stakeholders.

RESPONSIBLE PERSON(S):

Catalina Mistler, Chief
Program Administration and Services Division

Tae Kang, Senior Manager
Program Administration and Services Division

ATTACHMENT(S):

Attachment 10.1: ICC Early FAFSA PPY Communication
Attachment 10.2: Initial Cal Grant Award Notification
Attachment 10.3: California Aid Report (CAR)
Attachment 10.4: NASSGAP letter

"We're making it easier to fill out the @FAFSA – which can help you pay for college."
- The White House

STUDENTS SHOULD APPLY FOR FINANCIAL AID EARLIER

Students can apply for financial aid for fall 2017 starting October 1, 2016 and won't have to wait until January 1, 2017. This timing will allow students and their families to complete their financial aid application while, or even before, they apply for college admission. In addition, the application will now ask for income data from a year for which the income tax filing deadline has already passed. This change will allow the Free Application for Federal Student Aid (FAFSA) filers to

make better use of the Internal Revenue Service's (IRS) Tax Data Retrieval Tool. With the push of a button, the 2015 income tax information needed on the 2017-18 FAFSA will be transferred directly and securely from the IRS to the FAFSA!

Students applying for financial aid using the FAFSA or students who apply using the California Dream Act Application for undocumented students will benefit from the earlier application timeline.

STUDENTS RECEIVE NOTIFICATION EARLY ABOUT FINANCIAL AID

Although the March 2nd priority deadline still applies, consider the advantages for students of the early application date, including:

- ✓ Completing the FAFSA/California Dream Act Application before focusing on admissions applications
- ✓ Receiving an estimate of eligibility for state and federal financial aid early...in fact, before even applying for admissions (campuses may provide full financial aid packages with offers of admissions).

STUDENTS SHOULD GET STARTED BY

- ✓ Securing a Federal Student Aid (FSA) ID (www.fafsa.ed.gov or 1-800-433-3243) or CA Dream Act ID, if applicable (www.caldreamact.org)
- ✓ Attending a **FREE** Cash for College workshop for hands-on application assistance (www.cash4college.org)
- ✓ Opening an account to track state financial aid awards is required after a FAFSA or CA Dream Act Application is submitted (www.webgrants4students.org)
- ✓ Visiting www.icanaffordcollege.com

IF YOU PLAN TO ATTEND COLLEGE FROM	YOU CAN SUBMIT THE FAFSA FROM	USING TAX INFORMATION FROM
July 1, 2015 - June 30, 2016	January 1, 2015 - June 30, 2016	2014
July 1, 2016 - June 30, 2017	January 1, 2016 - June 30, 2017	2015
July 1, 2017 - June 30, 2018	October 1, 2016 - June 30, 2018	2015
July 1, 2018 - June 30, 2019	October 1, 2017 - June 30, 2019	2016

June 16-17, 2016



Initial Award Notification

- «STUDENTNAME»
 - «STREET»
 - «CITY»
- | | | |
|--|-----------------|----------------|
| | Date | «CALGRANTDATE» |
| | Grant ID Number | «GRANTID» |
| | CSAC ID Number | «CSACID» |
| | Academic Year | «ACAD_YR» |

The California Student Aid Commission (CSAC) is the state agency responsible for awarding Cal Grants and other specialized financial aid programs. Based on the self-reported information on your Free Application for Federal Student Aid (FAFSA) or California Dream Act Application (CADA) **and** Grade Point Average (GPA), we have determined your preliminary Cal Grant eligibility for the 2017-18 academic year.

Cal Grant award amounts vary by type of college. These are the current Cal Grant maximum award amounts that you could be eligible for if you enroll at least half time at an [eligible campus](#) from the following segments:

College Segment	Maximum Cal Grant Award Amount
California Community College (CCC):	\$1,656
California State University (CSU):	\$5,472
University of California (UC):	\$12,240
Private Colleges and Universities:	\$9,084

Remember that the Cal Grant is FREE money, and only one part of your financial aid package. You may also be eligible for the Federal Pell Grant, Work-Study Program, or Federal Student Loans; the California Community College Board of Governors (BOG) Fee Waiver; institutional financial aid offered at public and private colleges and universities; as well as other types of financial aid offered at your campus of attendance, such as private scholarships and student loans.

This is a Cal Grant award notification only. You must still apply for admission to the campus you plan to attend. Your college is required to recheck your eligibility for Cal Grant prior to disbursing your award. For questions about final eligibility determination and disbursement dates, check with your college of attendance.

The **WebGrants for Students (WGS)** website is a tool for you that allows you to check the status of your Cal Grant award, make school changes, to make sure your Cal Grant is in the correct award amount and that it goes to the college you will be attending, and keeps you updated with important deadlines and information to assist you with the financial aid process. **To get started, please follow these easy steps:**

- Go to www.webgrants4students.org.
- Click the link that says "Create an Account" OR log into your existing account.
- Confirm the campus you plan to attend OR select "Change School" if the college listed is not correct.
- Go to "Understanding My Cal Grant" (main menu) for more information about Cal Grant awards.
- Keep your **email** and contact information updated. We communicate with you using email, so make sure you check your email and WGS for updates. Keep your password private.

PRIVACY STATEMENT: Please be aware, Cal Grant information for students who are 18 years of age or older or students who have attended a postsecondary institution will only be released to parents or guardians with written [authorization](#) from the student.

Lupita Cortez Alcalá
 Executive Director



2017-2018 California Aid Report (CAR)

• «STUDENTNAME»	Date	«CALGRANTDATE»
• «STREET»	Grant ID Number	«GRANTID»
• «CITY»	CSAC ID Number	«CSACID»
	Academic Year	«ACAD_YR»

Congratulations, you have been offered a 2017-18 Cal Grant award! Review the steps below to ensure you receive your Cal Grant award offer beginning fall 2017.

Below is your Cal Grant Award offer based on the school confirmed in your WebGrants for Students account.

To receive the Cal Grant award offer you must:

- ✓ Log on to www.webgrants4students.org and create your WebGrants for Students (WGS) account to manage your Cal Grant and satisfy any outstanding requirements. Make sure you read "Understanding my Cal Grant" and keep your email address updated so you can receive up-to-date information notifying you of any changes that may impact this Cal Grant award offer.
- ✓ Understand your campus financial aid disbursement options. These may include a paper check, debit card, or direct deposit to your bank account. Check your campus student account or contact your financial aid office for Cal Grant disbursement dates.
- ✓ Register with the Selective Service if you are a male living in the U.S. and are between the ages of 18 through 25. For more information about Selective Service requirements go to www.sss.gov.
- ✓ Satisfy all outstanding Cal Grant requirements. Depending on the type of Cal Grant you have been offered, you may be required to complete a requirement on your WGS account. Failure to respond promptly will result in your award being withdrawn.
- ✓ Use this award offer during this academic year or your award may be withdrawn. Based on the final State Budget or final eligibility determined by your campus, this Cal Grant award offer may be reduced or withdrawn.
- ✓ **Confirm that the school listed below is the one you plan on attending. If it is not, you must submit a school change in your WGS account so you can get the award at the campus you will attend beginning fall 2017.**

Cal Grant Eligible Schools*:

Cal Grant A

Cal Grant B

«COLLEGE1»

«CALGRANTAFLD1» «CALGRANTBFLD1»

PRIVACY STATEMENT: Please be aware, Cal Grant information for students who are 18 years of age or older or students who have attended a postsecondary institution will only be released to parents or guardians with written authorization from the student.

Lupita Cortez Alcalá
Executive Director



nassgap

national association of state student grant and aid programs
www.nassgap.org

Frank Ballmann, Director, Washington Office
202-721-1186 Frank@nassgap.org

**2015-16
Executive Committee**

President

Stephanie Butler
Alaska Commission on
Postsecondary Education
P.O. Box 110505
Juneau, AK 99811-0505
(907) 465-8743
Stephanie.butler@alaska.gov

President-Elect

Clantha McCurdy
Massachusetts Department of
Higher Education
454 Broadway, Suite 200
Revere, MA 02151-3034
(617) 391-6098
cmccurdy@bhe.mass.edu

Past-President

Diane Lindeman
Kansas Board of Regents
1000 S. W. Jackson Street Suite
520
Topeka, KS 66612-1368
(785) 298-3517
dlindeman@ksbor.org

Secretary

Todd Brown
Iowa College Student Aid
Commission
430 East Grand Avenue
Des Moines, IA 50309
(515) 726-3405
Todd.brown@iowa.gov

Treasurer

Mark French
Connecticut Office of Higher
Education
61 Woodland Street
Hartford, CT 06105-2391
(860) 947-1856
mfrench@ctohe.org

Member-at-Large

Rachelle Sharpe
Washington Student Achievement
Council
917 Lakeridge Way SW
Olympia, WA 98504
(360) 753-7872
rachelles@wsac.wa.gov

Member-at-Large

Brenda Zastoupil
North Dakota University System
1815 Schafer Street, Ste. 202
Bismarck, ND 58501
(701) 224-2541
Brenda.zastoupil@ndus.edu

February 12, 2016

The Honorable Ted Mitchell, Under Secretary
United States Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Under Secretary Mitchell:

Thank you for your January 11, 2016 response to the National Association of State Student Grant and Aid Program's (NASSGAP's) November 6, 2015 letter, expressing concern about the Department's proposal to mask the order in which students have listed their schools on their FAFSAs to state grant agencies (SGAs), and requesting to meet with you to discuss those concerns.

We regret that there was not an opportunity to meet to discuss states' concerns prior to announcing the proposed policy change. NASSGAP member states continue to have grave concerns that no longer providing this information to the states will have significant unintended consequences in terms of increased burden to and confusion among the students served by state grant programs, particularly in terms of complicating the financial aid application process and delays in grant processing, as well as the impacts to students of increased costs to states. Our members strongly believe that if the Department understands the facts regarding this proposed change's impact on state grant aid programs and the unintended consequences of randomizing the student's FAFSA school list order, it will delay or reverse implementation of the randomization process. As a result, and on behalf of our 15 impacted member states, NASSGAP respectfully requests reconsideration of this proposed policy change.

The following information is provided in response to each of the concerns outlined in your letter, which we understand from your communication are the rationale behind making this change.

- 1) The Department states a concern that students do not understand the implications relative to state aid eligibility and notification that result from their designation of institutions, and especially the order of institutional designation. However, NASSGAP is not aware of any state in which a student loses eligibility for state grants or even loses



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the student's place in the queue for funding based on the student deciding to attend a school other than the one listed first on the FAFSA (unless, of course, the student enrolls at a school that is not eligible to receive/administer state grant funds). Additionally, NASSGAP is unaware of any student who was harmed by the student's state being made aware of which school the student listed first on the FAFSA. In all of the large state grant programs where order matters (for purposes of state budget and appropriation forecasting), a student preserves their place in line for the state grant process based on the FAFSA filing date regardless of what school is listed first. If the Department has become aware of student groups who are experiencing harm or confusion as a result of the states' practices of using school order to estimate appropriations and awards, NASSGAP would very much appreciate the opportunity to learn more so we can assist these students.

- 2) Specific to the Department's concern that students taking advantage of the new early FAFSA will be more uncertain about their school choice and will be confused by being asked to rank order institutions to which they wish to send their FAFSA information, please note that the states have never asked students to rank order their schools on the FAFSA. Rather, states may use the school order information to estimate appropriations needed to fund annual grant demand, and to provide students with estimates of awards, based on states' experience that the significant majority of students list their first choice of school first on the FAFSA. A number of states encourage students to list their preferred school first on the FAFSA to increase their awareness of state grant opportunities and the accuracy of estimates of demand for state grant dollars, but there is no state that withholds state aid based on the student not attending the first school listed, and not listing the preferred school first does not directly disadvantage the student. NASSGAP member states fund and deliver a wide range of state and local college access and early awareness programs and FAFSA completion initiatives that have successfully educated students about how the school order on the FAFSA impacts state grant aid, and member states have not found that students experience any confusion in this matter. We do not agree that making the FAFSA available three months earlier than in previous years will result in students having to complete the FAFSA without knowing their preferred school of attendance.

Rather, the direct disadvantage of randomizing school order is to the states, which must then expend already limited resources to contact students to learn which specific schools they plan to attend. The result of the additional work burden on the states directly disadvantages students in terms of confusion and additional paperwork burden, as well as potentially reducing resources available for grants -- and FAFSA completion initiatives -- due to the increased cost to the states. Additionally, several states have expressed concern that the randomization will actually delay awarding and flies directly in the face of the goals of early FAFSA. To quote one member state:



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Students can submit their FAFSA as early as October now but at least in [this state] won't know if they have an award until they go out to our new system portal and self-certify which college they will be attending. Only at that point can our system determine whether or not students meet the need component of the award. This will absolutely delay our awarding process.

- 3) State grant agencies and the college access organizations they partner with are the people who are working hand-in-hand with at-risk students and low-income families to help make college accessible and affordable. We are working with them on issues such as how to qualify for the most state aid, so scrambling the order of the student's school list before providing it to states will confuse students, who won't understand why the state doesn't have their school list in order and will create additional steps for both students and state agencies as they try to update the student's chosen school. This proposed change will also greatly increase confusion among potential college students and can be expected to greatly increase call volume to guidance counselors, college financial aid offices and state grant agencies.

States have worked hard to align with the Department's and federal efforts to simplify the FAFSA and integrate the state aid process into the FAFSA process. But if the student's school list order is scrambled, the process of obtaining a state grant becomes much more complex for students. The SGA must reach out to the student to determine their actual school. Whether by mail, email, or phone, the probability of successfully communicating with the student is well less than 100% - and the communication efforts have a cost that could decrease the funding available for state student grant aid.

Further, some states have expressed concern that such outreach to students may come across as a phishing scam, decreasing the chance that the student will respond. Why would it be perceived as a phishing scam? Because the SGA will be indicating that the student listed a school preference that varies from the actual school list (bad info is a warning flag) and will be requesting that the student log in through a link in an email, or by calling a phone number, with very sensitive information potentially including a Social Security Number, user ID and password (another warning flag). As you may know, of the people getting the letters from the Office of Personnel Management telling them their information has been hacked, far less than 100% are enrolling for the protection coverage because the enrollment process asks for the SSN and other sensitive information as part of the enrollment process. Assuming similar reactions from students being asked to provide information already provided on the FAFSA, we expect that students will be reluctant to respond and that reluctance may result in their missing key deadlines or other harm to those students who most need their state grants.



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It could be economically disastrous for students if they abandon the state grant aid process and do not receive their state student grant aid because the process becomes more complicated with more school update requirements because of the proposed change. There are hundreds of thousands of students who are impacted by this proposal, so there is significant potential that such a tragedy would be very large scope.

- 4) Finally, since the Department announced last year that it would no longer share the student's FAFSA school list or the order in which an institution was placed on the list with schools, NASSGAP members have implemented a policy of not sharing the school list order information with any school if they should request it. Further, in October, we requested that ED issue a Dear Colleague Letter (DCL) explicitly prohibiting SGAs from sharing that data if institutions request it to document the prohibition of sharing if institutions persist in asking. We believe that ED issuing such a DCL can put this concern to rest.

In summary, NASSGAP is asking the Department to reverse its proposed policy change and continue sending state grant agencies the student's FAFSA school list in the student's order for the 2017-18 academic year and beyond and to issue a Dear Colleague Letter verifying that such data is private and may not be shared with institutions of higher education. The reasons for this request include:

- NASSGAP's member states have indicated no awareness of any concerns expressed by students relative to the impact on state grant aid of the order of institutions listed on the FAFSA, only those of the Department. Furthermore, we do not believe that the Department's concerns will actually come to pass.
- Scrambling the student's school list order will disrupt state grant agency budget processes in the first year of early FAFSA and is anticipated to cripple some states' ability to award early.
- The student will have to go through additional steps to confirm their school choice, adding inefficiency and confusion to the process. As a result, the Department's new process would be going backwards in terms of the progress made in the federal-state partnership to streamline access to financial aid for our neediest students. We are perplexed that the needs of the states and their resident students are not being solicited in this decision-making process, and especially to learn that the reported costs of the states, as well as associated new processes and delays for students, are not being considered subjects for discussion.

I hope this information is helpful. It is provided with intent to respond to the Department's concerns as expressed in your letter, and to clarify concerns expressed by the states. NASSGAP leadership and members continue to be available at the Department's convenience, should the Department wish to have discussion of this matter.



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As always, NASSGAP very much appreciates the Department's ongoing work to simplify and enhance students' access to the benefits of higher education, and we look forward to continued collaboration as your state partners in those efforts. You may already be aware that NASSGAP was a signatory on the multi-organization letter expressing support for early FAFSA and for Prior-Prior Year, and the states certainly stand ready to assist our students in taking advantage of the opportunities associated with those changes.

Again, thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephanie Butler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stephanie Butler
President

cc: Roberto Rodriguez, Deputy Assistant Secretary to the President, The White House
James Kvaal, Deputy Director, Domestic Policy Council, The White House
Ajita Talwalker Menon, Senior Policy Advisor for Education, Domestic Policy Council, The White House
Spiros Protopsaltis, Deputy Assistant Secretary, United States Department of Education
Jeff Appel, Deputy Under Secretary of Education, United States Department of Education
Jeff Baker, Director, Policy Liaison and Implementation, United States Department of Education
Kathleen A. Smith, Education Policy Advisor, HELP Committee, Office of Senator Lamar Alexander
Mary I. Cassell, Senior Program Examiner, Office of Management and Budget, The White House
Philip M. Tizzani, Program Examiner, Office of Management and Budget, The White House