

PRESIDENTS' ON HIGHER EDUCATION ALLIANCE AND IMMIGRATION



Better FAFSA for Mixed-Status Families: Top 10 Things to Know So You Can Prepare

The Free Application for Federal Student Aid, or FAFSA, which unlocks the Pell Grant, workstudy, federal student loans and other forms of federal financial aid, is getting an overhaul this year as the U.S. Department of Education (ED) implements the <u>FAFSA Simplification</u> and <u>FUTURE Acts</u>. Most residents, including citizens, legal permanent residents, T visa holders, and other specified <u>non-citizens</u>, are eligible for federal financial aid, even if their parents are undocumented.

Completing the FAFSA is important because it can put college within reach financially. As a result of the recent legislative changes, Pell Grant eligibility is <u>expanding</u> and the formula for determining eligibility is becoming more <u>transparent</u>. This means thousands of additional students will be eligible to receive up to \$7,395 in federal grant money – money that does not have to be repaid – for college.

Changes to the FAFSA may however pose some challenges for mixed status families. People without Social Security Numbers (SSNs) will need to go through a separate process to attain an FSA ID, and Federal Student Aid (FSA), the office of ED that administers federal financial aid, has <u>announced</u> that the FAFSA will be released in December 2023 instead of the standard release date of October 1. This leaves less time for students and families to navigate a new process. This document provides an overview of key changes and things students and families need to know to get ready to apply for federal financial aid.

- Additional FSA ID Requirements. Under the new process, everyone who wants to enter information into an online FAFSA will need an FSA ID to access the form. This means students and parents who are required to provide financial information will need an FSA ID to fill out the form.
- 2. New FSA ID Process for People who do not have SSNs. FSA has announced that it is creating a new process for people who do not have SSNs, including parents who are undocumented, to create an FSA ID. In the past, people who do not have an SSN submitted information by mail and did not set up an FSA ID. This year, FSA will use information from TransUnion to verify applicants' identities by asking a series of questions that only that individual would know the answer to. This process will take place entirely online through the FSA portal. Once an individual's identity has been verified, they should immediately receive an FSA ID and be able to proceed with the FAFSA application process.
- 3. The FSA ID Process for People without SSNs will be Launched this Fall. FSA has not yet made public details about this process or said when the process will open. It has indicated that it will launch no later than when the FAFSA is released in December. We will provide updated guidance once the FSA process for people without SSNs is made public.
- 4. An ITIN is Not Needed to Attain an FSA ID. While the paper FAFSA form does provide a place for applicants and parents/guardians to enter an ITIN if they have one, an ITIN is not required for completing the form.

- 5. The Privacy of Data Collected Through the FAFSA is Protected by Federal Law. Federal law prohibits the use of data collected through the FAFSA for anything other than calculating federal and state financial aid. Entities with access to this data are also required to protect the data against security threats or unauthorized uses. FSA will not share FAFSA information with anyone except the schools the student indicates they want to attend (so they can use the information to offer financial aid) and a few federal and state government agencies (so they can check to be sure the information is accurate or determine financial aid eligibility). Counselors should assure families of these protections and respond to any concerns they may have about sharing identifying information.
- 6. There will be a Manual Process for Those who Cannot Verify their Identities Online. Students, parents, or guardians who are not able to verify their identities through the TransUnion process will still be able to provide identity verification documents directly to FSA. FSA has said that it intends to offer an online portal where applicants will be able to manually upload their documents, eliminating the need to mail them in. We do not have any additional information about which documents will be required or how the manual process will work. We will provide updated guidance as soon as FSA provides further information.
- 7. The Paper FAFSA Form Will Still be an Option. Families who would prefer to submit a paper FAFSA will still have that option and will not be required to obtain an FSA ID. However, the paper form will still require that all applicants provide consent for FSA to access their federal tax information from the Internal Revenue Service (IRS) and to verify their identity. Individuals who do not file taxes will have this fact verified by the IRS. They will still be required to provide income and asset information.
- 8. Parents Who Contribute the Most Financially Will be Required to Provide Financial Information. The parent who contributed the most financially to the student in the prior tax year (the FAFSA for the 2024-25 academic year will use 2022 federal tax information) will be required to provide their financial information on the FAFSA. If parents are married and filing jointly, only one parent will have to complete the form. If they are divorced, only the parent who contributes the most financially will be required to submit their financial information to the form. Early in the process, students will be asked to identify the parent(s) or spouse who will be contributing financial information on the form. It will be critical that they enter that person(s) information exactly as it appears in their FSA ID. Any mismatch could lead to delays in processing the student's FAFSA.
- 9. The Form will be Role-Based. Each person will only be able to see questions related to their role. When a student logs in, they will only be able to see questions that should be answered by the student. The parent or spouse will need to log in to see the questions related to their role. Each person must complete the questions associated with their role for the student to be able to submit the FAFSA.
- 10. Income Verification May be Required. In some cases, such as when ED is not able to pull federal tax information directly from the IRS, students and parents may need to provide additional documentation to verify their income. Students and families should seek support if they are flagged for verification to help them get through the process as quickly as possible.

We recommend counselors take the following steps to prepare for the upcoming application cycle:

- 1) Encourage eligible students to set up their FSA ID and complete the FAFSA as soon as possible and to reach out to a trusted counselor or advisor if they have questions.
- 2) Brief school communities, including parents, on changes to this year's process.
- 3) Connect with undocumented and mixed status families to address any concerns they may have about the financial aid process.
- 4) Check back frequently for updates from FSA regarding the process for undocumented parents and guardians.

We will continue to report critical information to our members as we learn more. To stay up to date, you can also bookmark <u>NCAN's Better FAFSA page</u> and FSA's <u>Better FAFSA page</u> and sign up for FSA's <u>partner emails</u>, which provide critical information to school counselors, college access organization staff, and other student mentors.