



April 25, 2022

PRA Coordinator of the Strategic Collections and Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave. SW, LBJ, Room 6W208D  
Washington, DC 20202-8240

To whom it may concern,

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit to the U.S. Department of Education (ED) our comments on the 2023-2024 Free Application for Federal Student Aid (FAFSA), docket No.: ED-2022-SCC-0024.

NASFAA represents nearly 20,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S.

### **Removal of FAFSA question “Are you male or female”**

We are concerned about the removal of the question “Are you male or female?” Understanding that this information is no longer necessary for determining Selective Service System registration status, it is still essential for evaluating FAFSA completion trends. Further, some institutions use this information to match ISIRs to student records since many no longer collect Social Security numbers on their admissions applications.

Given that a FAFSA question on gender will be required for the 2024-25 award cycle, this one year lapse in FAFSA gender data will cause institutions to have to develop new systems to accommodate the missing gender data in 2023-24, only to have to make changes again for 2024-25 when gender data returns. Retaining the question for 2023-24 would result in the least possible disruption.

### **Provisional Independent Student Status**

In separate joint comments with the Vera Institute for Institute for Justice on the Incarcerated Application Form, we recommend on-time implementation of provisional independent student status for incarcerated students. Given that there is no assurance that every incarcerated student will complete the Incarcerated Applicant Form instead of the regular FAFSA we recognize that,

operationally speaking, it is likely preferable to implement provisional independent student status on-time for all students.

In order to exercise this authority, the instructions on page 10 of the FAFSA would need to be updated to account for the possibility of provisional independent student status. The electronic version of FAFSA would also need to be updated to remove language stating the impact of not providing parent information. All versions of FAFSA would also require an additional question for students to indicate their desire to complete the FAFSA without parental information for the purpose of determining their Title IV student aid eligibility based on provisional independent student status.

### **Summary of enhancements to electronic versions of the FAFSA/earnings instructions**

ED states that they have changed the instructions for reporting Income Earned from Work in questions 35, 36, 83 & 84 to be clearer, with the new text reading, “This information may be found on the W-2 forms or by adding up the following items: IRS Form 1040 – line 1 (or IRS Form 1040NR – line 1a) + Schedule 1 – lines 3 + 6 Schedule K-1 (IRS Form 1065) – Box 14 Code A.” There is a missing “+” sign between the “6” and the “Schedule K-1.” The “+” sign is included in the summary of enhancements to the paper FAFSA and is presumably an error in the electronic form summary.

These instructions, both in the electronic and paper versions of the FAFSA, could also benefit from adding brackets and replacing dashes with commas so as not to be confused with the subtraction symbol. Also, adding relevant boxes where earnings data can be found on the W-2 would add clarity to current instructions that indicate only that earnings can be found on the W-2 form, but not where on that form. Suggested text (including correction of the missing “+” sign) is:

“This information may be found in Box(es) x on the W-2 forms or by adding up the following items: [IRS Form 1040, line 1 (or IRS Form 1040NR, line 1a)] + [Schedule 1, lines 3 + 6] + [Schedule K-1 (IRS Form 1065), Box 14 Code A].”

We appreciate the opportunity to comment on this proposed data collection. If you have any questions regarding these comments, please contact me or NASFAA Senior Policy Analyst Jill Desjean at [desjeanj@nasfaa.org](mailto:desjeanj@nasfaa.org).

Regards,

A handwritten signature in black ink, appearing to read "Justin Draeger". The signature is fluid and cursive, with a long horizontal stroke at the end.

Justin Draeger, President & CEO