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GRADUATE, UNDERGRADUATE AND EQUITY AFFAIRS

OFFICE OF THE PRESIDENT
1111 Franklin Street
Oakland, California 94607-5200

September 13, 2024

Melanie Storey
Director, Policy Implementation and Oversight
Office of Federal Student Aid
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Re: Request for Information (RFI) Regarding Ways to Support the Successful Completion and
Submission of the 2025-2026 FAFSA Form
Docket ID ED-2024-FSA-0099

Dear Ms. Storey:

On behalf of the University of California (UC), one of the country's premier public research university systems, serving more than 233,000 undergraduate students, we appreciate the opportunity to provide comment on the August 14, 2024, notice of Request for Information Regarding Ways to Support the Successful Completion and Submission of the 2025-2026 Free Application for Federal Student Aid (FAFSA) Form as referenced in Docket ID ED-2024-FSA-0099.

We believe that improving the accessibility of FAFSA is crucial to ensuring equitable access to higher education for all students. For your consideration, UC has identified several areas that would improve both the applicant experience and completion rates of the FAFSA. Below are key highlights from our feedback, including requests for:

- **Clarification About FAFSA Questions**: There are certain questions on the application where the help text can be retooled to provide additional information. These include taxable benefits received, the reporting of social benefits received and making the selection of "Unsubsidized loan only." Additionally, the Chatbot feature should be modified to provide additional assistance as needed.
- **Development of Informational Resources**: Additional resources, such as tip sheets, developed in partnership with colleges and universities and targeted towards specific audiences would improve a student's experience and provide helpful information when navigating the FAFSA form. Such resources can also support offices in their efforts to assist students.
- **Communication Channels**: Mapping out a communications plan that utilizes all forms of methods of delivering information will help the contributors to utilize the tools created.

## FAFSA Question Clarity

Many students and families are unclear about what information to manually input on the FAFSA. This includes information on taxable grants and scholarships, tax information and eligibility criteria which would necessitate they answer yes. We recommend the following actions:

- Provide students and families with help text informing them that tax data will be transferred automatically and does not need to be manually entered on the FAFSA.
- Provide specific guidance on how to determine free or reduced-price lunch eligibility as the meaning of this may vary by state.
- Clarify what saying yes to the "Unsubsidized loan only" question means. For example, students with parents who do not contribute is not the only qualification necessary to respond yes to the question.
- The Chatbot feature should always provide phone or email contacts as an optional resource for questions asked. This is especially important when a question submitted by a contributor has not received a sufficient response and requires additional information.

## Informational Resources

Partnering with colleges in the development of concise resources would go a long way in improving our efforts to support FAFSA completion. Financial aid staff at colleges and universities have assisted students and families in navigating many of the technical errors faced during the application process and can be a valuable partner in the creation of helpful resources that meet the needs of the filer.

We recommend a tip sheet for FSA IDs for parents without Social Security Numbers (SSN) that provides easy-to-understand requirements that will produce successful results. Financial aid administrators have found this population to disproportionately experience system glitches versus their peers. For example, many of these applicants encounter this issue when the parent contributor's FSA ID address does not match the address used by the student contributor when sending an invitation to input information. Beyond matching characters, addresses need to be entered in all caps to successfully apply for an FSA ID. This nuance is not publicly available in any guidance on the FSA ID process and the discovery was made by one of our campuses, which spent extensive time assisting a student by using trial and error to help complete this part of the application process.

In addition to the example mentioned above, we have identified the following additional populations that could benefit from informational resources: applicants who require two parental contributors, first-generation students, low-income students, homeless and former foster youth and students with disabilities. These populations face unique challenges when completing the FAFSA form and would benefit from resources to help them navigate the process.

## Leveraging Communication Channels

In our efforts to support and promote FAFSA completion, our campuses continue to see value in offering in-person or virtual drop-in sessions where families can receive one-on-one help with completing the FAFSA and addressing their financial aid questions. We also provide peer mentoring programs where we pair students who have completed the FAFSA form with other students who need assistance. In addition, we and our state outreach organizations host FAFSA completion workshops for families. Our current efforts would be more impactful with increased communications efforts and resources from the department.
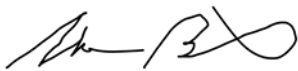
We encourage the department to provide digital resources to student and parent contributors about steps and actions required to complete the FAFSA using a multi-channel approach that combines direct communication, social media and partnerships. Direct communications (emails and text messages to contributors) made at key points in the FAFSA cycle can be tremendously impactful.

- Email communications can let contributors know application status information and remind them to act when necessary.
- Text message reminders and alerts will help reach contributors who may not regularly check their email.
- Social media can be a useful tool to get information to contributors and college partners. Creating a dedicated social media account for FAFSA-related information could improve the dissemination of timely updates and provide the intended audience with high-level insight and drive them to more in-depth communications with further information. The dedicated FAFSA account would also separate important application information from all of the other non-application-related content.
- A virtual knowledge exchange platform—such as Slack or a similar platform—can be a place for administrators to ask questions and share ways to troubleshoot issues that arise. The information from this platform could also be used by the department to identify unknown issues. In addition, providing flexibility for financial aid staff to talk with help desk staff about specific student issues would streamline the way we are able to assist students with completing the application process.

The dissemination of targeted resources should be done using every avenue possible. Partnering with high schools, community organizations and college access programs can help maximize the reach of students from these populations and distribute information about the available support resources. Targeted social media campaigns can help to reach students from these populations and promote available support and resources. Equipping financial offices with resources can help with addressing the needs of families seeking assistance with the FAFSA form. Finally, sending targeted emails and text messages to students identified as belonging to one of these populations can help to ensure they are aware of these support materials.

UC is encouraged by the department's recognition of the need to engage colleges and universities in improving the FAFSA process. We also appreciate the opportunity to comment and look forward to partnering with the department on solutions that will benefit all FAFSA applicants.

Sincerely,

Shawn Brick, M.P.P.
Associate Vice Provost, Student Financial Support
University of California, Office of the President

cc:     Provost and Executive Vice President Katherine S. Newman, Academic Affairs
        Interim Senior Vice President Meredith Turner, External Relations and Communications
        Associate Vice President Chris Harrington, Federal Governmental Relations