



GRADUATE, UNDERGRADUATE AND EQUITY AFFAIRS

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

April 7, 2025

Kun Mullan
PRA Coordinator
Strategic Collections and Clearance Governance and Strategy Division
Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Request for Information (RFI) Regarding the 2026-2027 FAFSA Form Docket ID ED-2025-SCC-0011

Dear Mr. Mullan:

On behalf of the University of California (UC), one of the country's premier public research university systems, serving more than 236,000 undergraduate students, we appreciate the opportunity to provide comment on the February 4, 2025, notice of Request for Information regarding the 2026-2027 Free Application for Federal Student Aid (FAFSA) as referenced in Docket ID ED-2025-SCC-0011.

We believe that improving the accessibility of the FAFSA form 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 form. Below are a few highlights from our feedback, which are referenced in the attachments provided, and include 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 the reporting of social benefits received and modifying the form for incarcerated students to reduce confusion about programs for which they are ineligible.
- **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 user experience and provide helpful information when navigating the FAFSA form. Such resources can also support financial aid offices in their efforts to assist students.
- **Communication Channels:** Mapping out a communications plan that utilizes all methods of delivering information and resources that will help students and parent contributors successfully complete the FAFSA form.

- **Addressing Challenges to FAFSA Completion:** Current barriers to completing the FAFSA form primarily stem from data privacy and security concerns that could discourage students from applying for aid they are eligible.

Clarification About FAFSA Questions

Many students and families are unclear about what information to manually input on the FAFSA form. This includes information on federal benefit eligibility criteria and reducing erroneous text on programs that do not apply to incarcerated applicants. We recommend the following actions:

1. Provide specific guidance on how to determine free or reduced-price lunch eligibility as the meaning of this may vary by state.
2. Refer applicants to their state governments on aid eligibility if they have a Social Security number and are not citizens or eligible noncitizens.
3. Adjust the help text to clarify what an applicant should not include, such as negative equity in net worth and temporary guardianship in the definition of legal guardianship.
4. Remove references to inapplicable programs or information for incarcerated students. For example, federal direct loans, work-study and living expenses do not apply to incarcerated applicants.

Development of Informational Resources

Partnering with colleges to develop concise resources can enhance efforts to support FAFSA completion. Financial aid staff at colleges and universities have assisted students and families in navigating 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 parent contributors 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 and/or with exact street suffixes or road types to successfully apply for an FSA ID. This nuance is not publicly available in any guidance on the FSA ID process—and was discovered by one of our campuses—which required 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.

Communication Channels

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 students 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 students and parent contributors) made at key points in the FAFSA cycle can be tremendously impactful. Specifically, we recommend the following:

1. Email communications to let contributors know application status information and remind them to act when necessary.
2. Text message reminders and alerts to help reach contributors who may not regularly check their email.
3. Social media, which 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.
4. A virtual knowledge exchange platform—such as Slack or a similar platform—which 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 or share broad information, such as shifting the role responsibility of adding schools to the FAFSA from the Office of Federal Student Aid to financial aid offices. 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 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.

Addressing Challenges to FAFSA Completion

Last year, students and families experienced challenges in completing the FAFSA form with the largest changes to the form in over a decade. While most of these have been resolved, there remain concerns about data security and privacy. We outline a couple of the scenarios below and urge the department to demonstrate its commitment to data security and privacy through robust messaging for public consumption on the legal uses of FAFSA data, the controls in place to ensure the security of the data collected, and the rights students and families have over data they submit via the application.

The first example of concern over privacy and data security is the recent replacement of the gender identity question with biological sex. Restricting applicants to a binary sex will result in erroneous information as it fails to address those born as intersex, those who do not wish to share their gender out of privacy concerns and those who have legally changed their gender markers. This restrictive question creates unnecessary risk of discrimination and psychological distress; students who cannot answer the question or who do not wish to answer out of concern of the sharing of the information will be prevented from completing the FAFSA.

The answer to this question has no bearing on their financial aid eligibility. This could have a broad impact across family incomes, including middle- and upper-class families who, at minimum, will be prevented from accessing educational loan opportunities. To mitigate erroneous data reporting and ensure equitable access to higher education, we ask the department to implement the following policy adjustments:

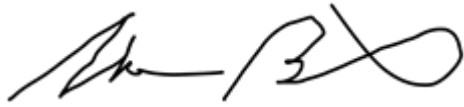
1. Reinstate “Prefer not to answer” as an option to accommodate students who have privacy concerns or who cannot answer the question with accuracy.
2. Provide clear, standardized guidance on ways to answer the question of whether an applicant was born intersex or was not provided a sex marker at birth.

Second, parent contributors without a social security number (SSN) faced a number of unexpected challenges with the requirement to establish identity to set up the FSA ID. Campuses continue to share the sensitive data matching required to complete the form. This includes upper and lower case when entering names and addresses. Additionally, address discrepancies with common street suffixes that can cause a failure to match the information on file for the FAFSA contributor, such as spelling out APARTMENT as opposed to abbreviating APT.

These modifications are essential to optimize FAFSA’s operational efficiency and ensure compliance with principles of equal opportunity. Immediate action is required to eliminate these discriminatory barriers and ensure fair access to federal financial aid for all students.

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 on and look forward to partnering with the Department with solutions that will benefit all FAFSA applicants.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shawn Brick', with a stylized flourish at the end.

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
Senior Vice President Meredith Turner, External Relations and Communications
Associate Vice President Chris Harrington, Federal Governmental Relations