



• **New York State Financial Aid Administrators Association** •

March 26, 2024

Dear Legislator,

On behalf of the New York State Financial Aid Administrators Association (NYSFAAA), we thank you for your continued support of New York students' pursuit of a postsecondary education. NYSFAAA was founded in 1968 and is an association of over 1,000 student financial aid professionals from across the state representing all sectors of our diverse higher education system (SUNY, CUNY, independent non-profit and proprietary). Our volunteers advocate for and promote equal access to post-secondary education for all students in New York State.

Today, we join with National Association of Student Financial Aid Administrators (NASFAA), Eastern Association of Student Financial Aid Administrators (EASFAA) and other state financial aid administrator organizations to express our concerns regarding the challenging implementation of FAFSA Simplification. The delays and technical challenges with the Free Application for Federal Student Aid (FAFSA) have put acute pressure on students and their families, particularly those from marginalized or vulnerable backgrounds.

NYS financial aid administrators have been working diligently to prepare for all phases of FAFSA Simplification and the rollout of "Better FAFSA, Better Future". The U.S. Department of Education (ED) has just begun providing initial FAFSA files to schools, but many schools are unable to take immediate action in reviewing these files due to recent technical changes provided by ED and subsequent reconfiguration of systems to manage those changes.

Additionally, in an informal survey of institutions active in online communities of NASFAA, it was found that approximately 17-25% of FAFSAs transmitted to schools were in rejected status. Resolution of these FAFSAs will require significant manual intervention from both institutions and students.

NYS financial aid administrators must be able to focus our energies to the job of ensuring equitable access to postsecondary education during this time of great change. To do that, we need relief from the other activities that direct our limited time and resources away from what matters most: college access and success.

To that end, we ask you to urge ED to:

- **Provide concrete timelines** detailing target dates for the delivery of the full backlog of FAFSA forms as well as the many paper FAFSAs students completed when they could not access the electronic version. Provide information on the cadence of file delivery moving forward.

- **Provide concrete timelines** for when students and schools will be able to make corrections to the high volume of rejected ISIRs.
- **Suspend verification requirements**, with the exception of identity and statement of educational purpose verification. Verification requirements are barriers to students pursuing enrollment, made more complex by ongoing processing delays.
- **Delay Financial Value Transparency (FVT) and Gainful Employment (GE) reporting requirements.** While we await further clarification from ED on how institutions can implement FVT and GE rules, it is of the utmost importance to delay all reporting requirements related to the FVT and GE portion of the rules beyond the July 31, 2024, deadline. We urge you to update this to July 31, 2026, in acknowledgement financial aid administrators will begin assisting families with the 2025-2026 FAFSA, perhaps while still working through issues related to the 2024-2025 FAFSA. A recovery year is essential so that students, families, and institutions experience a normal processing year without implementation of a new set of arduous and labor-intensive federal requirements.
- **Reduce the wait time** for services offered by the Federal Student Aid Information Center (FSAIC). Students are reporting long wait times that have affected their ability to obtain assistance in completing their FAFSAs.
- **Expand the hours of CPS/SAIG Technical Support** to provide support at a minimum of 16 hours per day, 6 days per week. Current hold times for resolving EdConnect issues span hours and delays in response to escalated issues result in further compression of processing timelines.
- **Resolve outstanding technical issues** preventing students from submitting the FAFSA. While many unresolved FAFSA Application issues have identified “workarounds,” as of the date of this letter, [four outstanding issues](#) prevent some students from submitting a FAFSA. We are concerned that continued complex workarounds may further confuse and discourage applicants.
- **Provide concrete timelines** with milestones for 2025-2026 FAFSA delivery.

In looking to the future, it is important Congress and the White House prepare for what will unquestionably be a decline in college attendance from 2023-24 to 2024-25, particularly for first-time students. These challenges and delays will translate to lower enrollment in a time where a postsecondary education is increasingly critical to local, state, and national policy goals.

We acknowledge the extensive challenges ED is working to overcome while implementing the exciting new, streamlined FAFSA. We have long appreciated a successful partnership between the financial aid community and ED and we share a goal of doing what is best to ensure students are most successful. We respectfully ask for your assistance in securing the time and space to attain that shared goal.

Regards,

Patti Donahue

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NYSFAAA President