

June 10, 2024

Manager of the Strategic Collections  
and Clearance Governance and Strategy Division  
US Department of Education  
400 Maryland Ave, SW  
Room 6W203  
Washington, DC 20202-8240

RE: Process for FSA ID Account Creation for Individuals Without a Social Security Number in Connection With Person Authentication Service (PAS) ([Docket No.: ED-2023-SCC-0216](#))

EdTrust, an organization committed to advancing policies and practices that dismantle the racial and economic barriers embedded in the American education system, thanks the U.S. Department of Education (“the Department”) for the opportunity to comment on the process for FSA ID account creation for individuals without a Social Security number (SSN) in connection with person authentication service (PAS).

The new process for FSA ID account creation for individuals without an SSN is one of many changes the Department is implementing, as directed by the Fostering Undergraduate Talent by Unlocking Resources for Education Act (FUTURE) Act and the Free Application for Federal Student Aid (FAFSA) Simplification Act of 2022. We applaud the efforts behind the simplified FAFSA, which will increase aid to students from low-income backgrounds by expanding the number of students who are eligible for the Pell Grant, increasing the number of students who will receive the maximum Pell Grant award, and making it easier for institutions to identify the neediest students through the new Student Aid Index. We also commend the Department’s decision to change course and correct the Student Aid Index calculation so that it accounts for inflation in this 2024-25 award year. The many changes to FAFSA will make the application and federal aid more accessible to students, especially to students of color and those from low-income backgrounds, who disproportionately face greater barriers in accessing college.

The process outlined by the Department for FSA ID account creation for individuals without an SSN could be improved to reduce the burden on mixed-status families, or families in which members have different immigration and/or citizenship statuses. In this case, a “mixed-status family” refers to one in which the FAFSA filer is a U.S. citizen and at least one parent is undocumented and lacks an SSN. EdTrust recommends the following improvements and additions:

- Increase the Department’s estimated number of respondents creating an FSA ID without an SSN, and amend the FSA ID creation process to reduce the number of burden hours for filers without an SSN
- Allow individuals to use an Individual Taxpayer Identification Number (ITIN) to verify their identity via the Internal Revenue Service (IRS)
- Eliminate the need for individuals to call and engage with the Federal Student Aid Information Center (FSAIC) to initiate manual identity verification
- Create a secure online portal where individuals can upload personal identity verification documents to the Federal Student Aid site

The Department's Supporting Statement for Paperwork Reduction Act Submission (OMB Number: 1845-0179) estimates that 3,500 individuals undergo the non-SSN process of FSA ID account creation yearly. In the United States, approximately 3.9 million primary and secondary school students live with a parent who is undocumented and lacks an SSN.<sup>i</sup> Of the children born to undocumented individuals, 81% are U.S.-born and, therefore, qualify to receive federal aid, should they choose to pursue a postsecondary education. FWD.us estimates that approximately 491,000 students aged 17-21 have at least one undocumented parent.<sup>ii</sup> This is the primary age group of those filing the FAFSA. The Department should revise its estimate of the number of respondents who will attempt the non-SSN process of the FSA ID account creation to reflect that statistic.

Most students with undocumented parents are Latino and come from households with incomes that would make them eligible for a Pell Grant.<sup>iii</sup> Latino students and students from low-income backgrounds already face barriers that make their college enrollment and graduation rates lower than those of their White peers.<sup>iv</sup> However, students with undocumented parents face unique additional challenges. For example, while federal law prohibits the use of any information collected on the FAFSA for purposes other than federal and state financial aid calculations, undocumented parents often have reservations about sharing personal identifying information that is required to fill out the FAFSA, out of fear that the information could fall into the hands of another agency — like the Department of Homeland Security. This fear is a pervasive barrier to FAFSA completion for mixed-status families.

In recognition of such barriers, the Department should take steps to minimize the burden of FSA ID creation for individuals without an SSN. In the Department's new process, individuals without an SSN are unable to undergo a match with the Social Security Administration and are prompted to answer one to four knowledge-based verification questions via TransUnion. At the start of this year's 2024-2025 FAFSA cycle, individuals who failed the TransUnion verification step had to call the FSA Information Center (FSAIC), be assigned a case number, and then submit unexpired copies of the specified acceptable forms of identification via email.

In the Department's Supporting Statement for Paperwork Reduction Act Submission (OMB Number: 1845-0179), it estimates that this process would take 20 minutes, on top of the estimated 15 minutes for standard FSA ID account creation. We believe this 20-minute estimate is inaccurate. There have been widespread reports of long FSAIC call wait times, with some individuals waiting for hours or needing to call multiple times to get through to a representative and be assigned a case number.<sup>v</sup> Numerous callers to the FSAIC have said they were met with an automated message advising them to call back later due to the high volume of calls.<sup>vi</sup> Additionally, many individuals have had trouble uploading required identification forms and sending them via email. Those with limited access to technology have been even more profoundly affected, as they must coordinate with schools or local libraries to complete the FAFSA. If they are unable to reach a FSAIC representative because of a long wait time or limited hours of operation, they will have to schedule yet another time to return to the school or local library to complete this verification step.

To reduce the burden on families with individuals who lack an SSN, we recommend that the Department add the ability to verify a person's identity using an individual taxpayer identification number (ITIN). The Department already partners with the IRS to have federal tax information transferred to the FAFSA form, so we encourage an expansion of this existing partnership to provide another simple means for

identity verification. While not every individual without an SSN has an ITIN, this process would greatly expedite FSA ID account creation for many FAFSA contributors.

To reduce the burden on individuals who encounter a problem when attempting to verify their identity through TransUnion by answering a series of knowledge-based questions, we urge the Department to eliminate the need for them to call FSAIC to initiate their manual identity verification process, especially since calling FSAIC only results in the creation of a case number. The Department should create a secure portal on the FSA site where users can upload personal identification documents and answer the questions on the required "Attestation and Validation of Identity Form." Failure to verify via TransUnion's knowledge-based questions could automatically bring up the portal where users can upload acceptable identification documents. Currently, individuals who are asked to manually verify their identity must do so by emailing their documents to the Department at [IDVerification@ed.gov](mailto:IDVerification@ed.gov). Their data would be far more secure if it were sent via an FSA portal, instead of by email, which is inherently unsecure.

While we are grateful for the opportunity to comment on the future of the Department's implementation of information collection for individuals creating an FSA ID without an SSN, we would be remiss not to highlight the many barriers this process has created for mixed-status families in this year's 2024-2025 FAFSA.

When the 2024-2025 FAFSA opened, students from mixed-status families were shocked to discover that they were unable to add required contributors to their FAFSA form if that contributor did not have an SSN. These students were unable to complete and submit a FAFSA form, leaving them in limbo and at risk of failing to meet state and institutional aid deadlines. At the end of February 2024, as the crucial March 1st deadline approached, the Department released temporary guidance on how students of this affected application could submit an *incomplete* FAFSA application so that these students would have a submission date associated with their FAFSA application to meet state and institutional deadlines. Students from mixed-status families were left unable to return to make corrections and submit a complete FAFSA application until April 2024.

When required non-SSN contributors were finally able to be added to FAFSA applications, these families experienced great difficulties completing their FAFSA because of the complex nature of the manual identity verification process. In practice, this process was riddled with errors and difficulties, with contributors without an SSN never receiving their required case numbers, personal identification documents still not being processed several weeks after submission, and more. These difficulties again left students in limbo and at risk of failing to meet May 1st commitment deadlines. As the Department made the decision to allow required non-SSN contributors to bypass identity verification so that students could submit complete FAFSA applications, these students still experienced difficulties with adding their required non-SSN contributors to their FAFSA application. Also, bypassing identity verification has only delayed the problem to next year, when students and their contributors will be required to complete manual identity verification to have Title IV funds dispersed.

At EdTrust, we have supported students, families, and advocates as they have navigated the long list of errors, workarounds, and system changes affecting mixed-status families. We have created a web hub to make the most important and relevant resources accessible to families. We also hosted two webinars on how to submit the FAFSA as a mixed-status family, where we heard about the difficulties families were facing, especially when they did not have the FSAIC to reliably turn to. Lastly, we created a decision-tree

tool to direct mixed-status families to the workaround steps specific to them amidst the constantly changing guidance. To date, the tool has received more than 1,700 users, with most of them experiencing errors with FSA ID creation and adding required non-SSN contributors to the student's account.

As the Department has already noted in the supporting documents accompanying this comment request, any delays in accessing the FAFSA form threaten to delay access to student financial aid and potentially deter students from enrolling in college. FAFSA completion rates continue to lag behind previous years' rates, and we know that the FSA ID creation process and the difficulties posed for mixed-status families have contributed to students failing to submit and complete their FAFSA application. Therefore, we urge the Department to implement the recommended changes outlined here for future FAFSA forms so that the time and cost burdens for future mixed-status families are reduced. It is imperative that the FSA ID account creation process of the 2024-25 FAFSA cycle not be repeated in its current form for the upcoming 2025-2026 FAFSA cycle.

We thank you for your consideration and for the opportunity to comment. Should you have any questions regarding the content of this letter, please contact Reid Setzer, [rsetzer@edtrust.org](mailto:rsetzer@edtrust.org) or Sayda Martinez-Alvarado, [smartinezalvarado@edtrust.org](mailto:smartinezalvarado@edtrust.org).

Sincerely,

EdTrust

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<sup>i</sup> Passel, J. S. & Krogstad, J. M. (2023). *What we know about unauthorized immigrants living in the U.S.* Pew Research Center. <https://www.pewresearch.org/short-reads/2023/11/16/what-we-know-about-unauthorized-immigrants-living-in-the-us/>

<sup>ii</sup> Connor, Phillip, (2024). *FAFSA US Citizen Students Estimates*, FWD.us. [https://docs.google.com/spreadsheets/d/1JWytIkfj17jRjXo6YtMveiMI6IOrcRYKvySSsc\\_1fqc/edit#gid=0](https://docs.google.com/spreadsheets/d/1JWytIkfj17jRjXo6YtMveiMI6IOrcRYKvySSsc_1fqc/edit#gid=0), based on analysis from this report on mixed-status families: <https://www.fwd.us/news/mixed-status-families> and using this methodology: <https://www.fwd.us/wp-content/uploads/2023/12/Methodology-ACS-2022-immigrant-assignment.pdf>.

FWD.us estimates the number of undocumented individuals using the 2022 American Community Survey with a methodology similar to the residual demographic method used by other research organizations including Pew Research Center, Center for Migration Studies, and the Migration Policy Institute. Estimates reflect U.S. citizen respondents who state they are in school, ages 17-21, living in a household with an undocumented parent.

<sup>iii</sup> Migration Policy Institute (2019). *Profile of the unauthorized population: United States* [Dataset]. <https://www.migrationpolicy.org/data/unauthorized-immigrant-population/state/US>

<sup>iv</sup> UnidosUS (2022). *A look into Latino trends in higher education: Enrollment, completion, & student debt*. UnidosUS. [https://unidosus.org/wp-content/uploads/2022/06/unidosus\\_latinotrendsinhighered\\_revision.pdf](https://unidosus.org/wp-content/uploads/2022/06/unidosus_latinotrendsinhighered_revision.pdf)

<sup>v</sup> Hoover, E. (2024, January 31). Locked out of the system. *The Chronicle of Higher Education*. <https://www.chronicle.com/article/locked-out-of-the-system>

<sup>vi</sup> Hoover, E. (2024, February 5). Education Department announces 'FAFSA college support strategy.' Here's what it involves. *The Chronicle of Higher Education*. <https://www.chronicle.com/article/education-department-announces-fafsa-college-support-strategy-heres-what-it-involves>