

**To:** The Honorable Miguel Cardona, Secretary, U.S. Department of Education  
**From:** The Presidents' Alliance on Higher Education and Immigration  
**CC:** Office of Postsecondary Education; Federal Student Aid; White House Initiative for Hispanics, U.S. Department of Education  
**Date:** September 13, 2024  
**Subject:** 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]

*Submitted electronically*

Dear Secretary Cardona,

On behalf of the undersigned institutions and organizations, we write to provide comments regarding the 2025-2026 Free Application for Federal Student Aid (FAFSA).

Federal financial aid is a critical resource that opens up access to higher education for millions of students each year. For many students, financial aid is the number one factor that determines whether or not they choose to enroll in college.<sup>1</sup> However, the financial aid process can also hinder enrollment and discourage qualified applicants from matriculating. During the 2024-2025 aid cycle, unexpected technical challenges caused significant delays for applicants, presenting many with the difficult decision of whether or not to enroll in college without knowing if they would be able to finance their education.

Students from mixed-status immigrant families were disproportionately impacted by the recent aid cycle, and many are still facing unresolved issues with the application portal. These challenges have imposed significant stress on applicants and continue to have a detrimental impact on campuses seeking to enroll and retain qualified students.

We are grateful for the opportunity to work with the Department of Education to ensure that all eligible students are able to access the financial aid to which they are entitled. As the Department prepares for the rollout of the 2025-2026 FAFSA, we offer ten recommendations that will help streamline the application process for students from mixed-status families and reduce the likelihood that they require later corrections to their forms. Our recommendations are divided into three sections: (1) Amendments to confusing language; (2) Changes to the manual identity verification process; and (3) Communication with impacted families.

## **I. Amendments to confusing language**

Members of mixed-status immigrant families may interpret aspects of the FAFSA differently from other applicants. This section outlines recommendations for help text that can support accurate and timely FAFSA completion.

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<sup>1</sup> Dynarski, Susan, CJ Libassi, Katherine Micheltmore, and Stephanie Owen. "Closing the Gap: The Effect of Reducing Complexity and Uncertainty in College Pricing on the Choices of Low-Income Students." *American Economic Review*, 111(6), 1721-1756.

1. Remove the word “legal” from question 33 asking contributors to identify their state of residence.

Question 33 of the contributor side of the FAFSA asks contributors to identify their state of legal residence. This question can cause anxiety and confusion for undocumented contributors, who may believe that they are unable to answer the question due to their immigration status. We recommend removing the word “legal” from this question and providing help text clarifying that the question refers to the amount of time the contributor has resided in the state. This help text should specifically articulate that the question refers to your permanent home and is not affected by immigration status.

2. Incorporate help text directing applicants to the appropriate box on their tax returns to support those manually entering their financial information.

During the 2024-2025 aid cycle, individuals who were not able to verify their identity using a social security number or the TransUnion process were asked to manually enter their financial information into the FAFSA. For individuals in this scenario, we recommend including text directing them to the appropriate numerical box on their tax forms where they will be able to find the requested information.

This addition will ensure that families can quickly and easily locate the appropriate information and enter it accurately into the form. Adding sign-posts will also support FAFSA completion for non-English speakers who depend on family translators when filling out the form.

3. Ensure that all components of the FAFSA, all help text, and all guides and tip sheets are available in the 11 common languages as articulated in the *FAFSA Simplification Act*.

To ensure that all families are able to understand the resources available to them regardless of their language proficiency, we recommend that the Department employ qualified professional translators to translate all questions, help text, and tip sheets to the 11 most common languages spoken by English Language Learners. We recommend employing translators with high proficiency to check the accuracy of all materials, as automated translation technologies often do not capture the nuances of questions included on the FAFSA.

In addition, we recommend that the Department establish a mechanism allowing users to toggle among languages without exiting their browser or changing their account language settings. Allowing users to switch back and forth among languages without exiting the form will help facilitate completion for families with varied English proficiency and will make it easier for children to support contributors with the translation of key words and phrases.

## **II. Changes to the manual identity verification process**

Currently, it is our understanding that the Department of Education plans to continue with the manual identity verification process for contributors without a social security number who are unable to use the TransUnion match process. The recommendations below will help facilitate a smoother process for families utilizing this option and will assuage concerns about the security of sensitive information.

4. Establish a portal where contributors can securely upload supporting documents and submit signed attestation forms, rather than submitting by email.

During the 2024-2025 aid cycle, contributors who were unable to verify their identities using the TransUnion process were asked to submit a variety of documents in order to proceed with the FSA ID creation. The submission process for these documents was not clear and posed concerns for individuals who were worried about the security of their information. In addition, the Department of Education has yet to communicate how documents submitted via email are stored, how personal information is protected, how the submission inbox is managed, and who will have access to these documents in the future. We recommend establishing a secure portal where individuals can upload the requested documents, along with their signed attestation forms. Using a portal will not only assuage security concerns but also help ensure that appropriate documents are submitted by providing clear upload categories.

5. Expand the list of acceptable documentation to establish identity.

Depending on their state of residence, living situation, and access to public resources, undocumented individuals may not have documents that meet the current requirements for manual identity verification. For example, individuals who live in a household with multiple other families may not have a utility bill in their name. Others may live in states that bar undocumented individuals from obtaining a driver's license. We recommend expanding the list of acceptable documentation to include other forms of identification, such as library cards, community center membership cards, ID cards issued by employers, and university/school district ID cards, and removing the requirement that these forms of identification be submitted alongside a utility bill.

6. Provide clear language regarding the use and protection of sensitive documents and information, including a direct response on how personal documents are stored and secured.

As described above, it is not clear to families how their information is stored and what protections are in place to ensure the confidentiality of sensitive documents. We recommend that the Department post affirmative, explicit language describing the use and maintenance of personal information. This language should be included at the beginning of the FAFSA process, on the submission page, and in confirmations sent to students and contributors after submission. It should also be included in any message requesting documents for manual identity verification. We further recommend including these assurances in automated messages confirming that requested documents have been received and in all tip sheets produced by the Department.

### **III. Communication with impacted families**

The Department of Education has made a commendable effort to provide families with timely updates on changes to the FAFSA process. However, we recognize that the challenges of the recent aid cycle will continue to impact families' trust in the Department and pose anxieties moving into the new academic year. There are some additional concrete steps the Department

can take to repair relationships with families and provide them with easy access to critical information.

7. Allow callers to select their preferred language before being placed in a queue.

During the 2024-2025 aid cycle, callers waited on hold to be connected to a provider in the FSA office. Non-English speakers were not able to indicate their preferred language before being placed in the queue. Once they were connected to an English-speaking provider, a translator needed to be located, and the call was transferred. Many of these calls dropped during the transfer process, requiring callers to re-enter the queue after long wait times. To avoid this problem during the 2025-2026 aid cycle, we recommend allowing callers to select from a list of languages before being placed on hold. Callers could then enter differentiated queues that would allow them to connect directly with the appropriate provider.

8. Create walk-through videos with detailed screenshots outlining the FSA ID setup process and FAFSA submission process for students from mixed-status families.

The beta testing period will allow the Department of Education to develop clear instructions for applicants utilizing alternative identity verification and submission processes, such as those from mixed-status families. We recommend using the beta testing period to create comprehensive walk-through videos that utilize test screenshots to show students and their families how to move through the FSA ID creation process. These videos should include any established workarounds put in place by the Department to facilitate access to the form for individuals who cannot use the TransUnion process to establish their identity. Creating videos up front will mitigate confusion for applicants and reduce the volume of call and email inquiries.

9. Communicate proactively with families throughout the identity validation process.

During the 2024-2025 cycle, families expressed consistent confusion regarding the best way to navigate the manual identity validation process. To help smooth their experience and facilitate timely completion, we recommend proactive, consistent communication via email with impacted families. Families should receive emails with: (1) Detailed instructions on how to submit identity validation documents; (2) Confirmation when their documents have been received; (3) Updates on the status of their identity verification; (4) Instructions on how to submit the FAFSA while awaiting identity verification; and (5) Confirmation when their identity has been verified.

10. Provide clear and consistent guidance for institutions of higher education on how to interpret applications from families currently impacted by the manual identity verification backlog.

Institutions of higher education are key partners in FAFSA completion. However, they have not received clear and consistent guidance regarding their role in supporting students from mixed-status families. Specifically, institutions need additional guidance on the following topics:

- Helping students navigate requested corrections to their application.

- Interpreting applications flagged as “limited” or “restricted” access due to a missing signature and/or identity verification.
- Navigating income verification for students who manually filled out the FAFSA form.
- Reserving aid for students who will experience delays in FAFSA submission.

Providing institutions with authoritative guidance on these topics will help ensure that students have access to informed support. These resources will also empower financial aid offices to work directly with their student body (including first-time applicants and returning students) to support FAFSA completion.

## **Conclusion**

FWD.us estimates that up to 500,000 students from mixed-status immigrant families could be eligible to complete the FAFSA during the upcoming aid cycle.<sup>2</sup> Addressing the needs of this population is critical for ensuring equitable access to higher education and for supporting the institutions that enroll them. The recommendations above represent a few ways that the Department of Education can support these students to ensure accurate and timely FAFSA completion. We are grateful for the opportunity to provide recommendations to the Department in advance of the full launch of the 2025-2026 aid cycle and stand ready to work with you to support access to higher education for all students.

Sincerely,

American Families United

American Friends Service Committee

Breakthrough Central Texas

Center for Law and Social Policy

Coalition for Humane Immigrant Rights (CHIRLA)

Eagle Pass Border Coalition

EdTrust

The Hope Center for Student Basic Needs

Immigrants Rising

Immigration Hub

ImmSchools

Latinos For Education

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<sup>2</sup> Connor, Phillip. “Immigration reform can keep millions of mixed-status families together.” FWD.us. January 18, 2024. <https://www.fwd.us/news/mixed-status-families-1/#>.

McHenry County College

National College Attainment Network

National Education Association

National Immigration Law Center

National Partnership for New Americans

The Presidents' Alliance on Higher Education and Immigration

Southern California College Attainment Network

Swarthmore College

UnidosUS

United We Dream

Young Invincibles