

ETN Guidance on 2025-26 FAFSA for Students from Mixed-Status Families

Students from mixed-status families (i.e., families made up of members with different legal statuses) have a legal right to all financial aid made available through the FAFSA. However, we understand students may have concerns about completing the FAFSA, given the incoming administration's rhetoric related to mass deportation. For each family to make the best decision for their individual circumstances, it is critical to understand what data is collected through the FAFSA and what data protections are in place.

1. Data collected on the FAFSA

The FAFSA collects the following personally identifiable information for students and their required contributors (parent(s) or spouse): name, birthday, SSN (if applicable), contact information (email address, mailing address, and phone number), driver's license number (if applicable), and financial information.

If a required contributor does not have an SSN, they must click a box that states, "I do not have an SSN." Being undocumented is not the only reason an individual would not have an SSN. For example, a U.S. citizen with a foreign parent living abroad would not have an SSN but is not undocumented. If a family is concerned about how the collected FAFSA information could be used, they might consider listing a P.O. Box for their mailing address, instead of their personal home address.

Some families may feel more comfortable completing the paper FAFSA, where there is no box asking them to confirm that they do not have an SSN. Instead, individuals without an SSN can leave the SSN question blank or fill in zeroes. ***The paper FAFSA is not inherently more or less secure than the online FAFSA and is protected by the same laws and regulations as the online FAFSA form.*** Families should consider that paper FAFSA submissions are subject to longer processing timelines and more prone to corrections due to the potential for human error in processing.

2. Legal Protections for FAFSA Data

There are many laws and regulations in place that protect the privacy of data collected through the FAFSA. Federal laws that protect FAFSA data include the [Family Educational Rights and Privacy Act \(FERPA\)](#) and the [Privacy Act of 1974](#), but individual states, cities, counties, and institutions also have their own sets of laws and regulations related to protecting the privacy of personal data. These laws and regulations are not new and were in place during the first Trump administration. The information already submitted to the FAFSA by students and families in previous aid cycles continues to be protected by the same laws and regulations.

[FAFSA federal laws](#) state that steps must be taken by the Secretaries of Education and Treasury to safeguard FAFSA data as it is transmitted between federal agencies, and to states and institutions. ***Federal law requires institutions, states, and the Department of Education to use FAFSA data only for the purposes of determining financial aid eligibility.***



These many laws and layers of protection would need to be repealed by Congress or violated for FAFSA data to be used by the federal government for punitive measures.

Historically, we have never seen personally identifiable information submitted to the FAFSA used for immigration enforcement purposes.

3. How to Discuss FAFSA with Families

Educators and college access professionals should avoid making assumptions or asking students directly about their familial immigration status. If a family shares their immigration status, the previous two sections are meant to equip educators and college access professionals with the knowledge needed to discuss security concerns related to the FAFSA. While recognizing that limiting data sharing could help ease a sense of risk, educators and college access professionals may want to acknowledge the other government agencies that potentially already have personally identifiable information (like the Internal Revenue Service, Department of Motor Vehicles, and United States Citizenship and Immigration Service), and that information submitted on the FAFSA is not necessarily more identifying than other forms of federal government interaction. In general conversations on FAFSA completion with all families, educators and college access professionals should describe the FAFSA data usage and privacy protections to help promote information sharing across all communities.

Ultimately, students and their families must decide based on their individual circumstances whether they feel comfortable completing the FAFSA given the political climate. Educators and college access professionals should empower families in their decision-making and emphasize the right to higher education that students have, as well as the many benefits and potential resources that come with completing a higher education. For students who decide to not complete the FAFSA, educators and college access professionals should work with students to pursue alternative avenues to financing higher education (state financial aid, scholarships, and private loans etc.) to help ensure that students continue their education.

