

The Honorable Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Avenue S.W.
Washington, D.C. 20202

Re: Docket ID Number ED-2023-SCC-0053

May 23, 2023

The Association of Community College Trustees (ACCT) appreciates the opportunity to provide comments on the draft 2024-25 Free Application for Federal Student Aid (FAFSA).

ACCT is a non-profit educational organization of governing boards, representing more than 6,500 elected and appointed trustees who govern over 1,200 community, technical, and junior colleges in the United States and beyond. Trustees have the fiduciary responsibility of their institution and responsibility for hiring the college leadership. Further, trustees are leaders in their community and are concerned with the health of the community college sector, both in terms of finances and student success.

As community colleges disproportionately educate students from low-income backgrounds, it is crucial that the FAFSA work well for our students. To that end, ACCT offers the following comments on the draft FAFSA:

1. **State Deadlines:** Given the shift in the FAFSA opening date, many states are re-evaluating their state deadlines. The state deadlines should be reviewed regularly and updated as needed so that students receive the most up-to-date information. This is particularly important for community college students as they are more likely to complete the FAFSA just prior to enrolling and to enrolling at non-traditional start dates.
2. **Demographic and Parent Education Status:** These two questions should be labeled as “for research purposes only,” specifying that the information is not shared with the colleges listed on the FAFSA. These questions may be discouraging to first-generation students who question whether or not they belong on campus.
 - a. The options under demographics should be alphabetized.
 - b. The definition of “attended” college should be included in the parent’s education status.

3. **Small Businesses and Investment Farms:** There is significant concern among the rural community college sector about the change in treatment of small businesses and farms. For farms in particular, the financial structure that requires borrowing at the beginning of the year and paying back that loan over the course of the year means that the debts against the farm fluctuate. ACCT is supportive of colleges working with Congress to re-evaluate how small businesses and farms are included in the asset calculation. For the Fiscal Year 2024-2025, the Department of Education could:
 - a. Remove or define "investment" as part of the farm.
 - b. Include in the instructions that the family home should *not* be included, even if it is physically located on the farm.
 - c. Provide further instruction on how to calculate assets.
4. **Housing Question:** While a small percentage of community college students live in on-campus housing, many campuses do provide housing to at least a portion of their students. For this reason, it would be beneficial for community college financial aid offices to receive information as to whether a student plans to live in on-campus housing.
5. **Foreign Languages:** The FAFSA Simplification Act expanded the FAFSA to include the 11 most common languages spoken by English language learners and their parents. The instructions on the FAFSA should include additional information for receiving support in those languages. Future versions of the FAFSA should be available in all 11 languages.
6. **Mailing Cost:** Given the required changes to the FAFSA to include separate financial information for spouses and each parent, plus the reformatting for an easier-to-use form, has resulted in a paper FAFSA that is multiple pages longer than the previous paper FAFSA. The mailing instructions should include whether additional postage is required for 14 pages using an average weighted paper. This is particularly important for the currently incarcerated population who now have access to Pell Grants and are required to complete the paper form.

Thank you again for the opportunity to provide these comments. If there are further questions, please contact Carrie Warick-Smith, Vice President-Public Policy, ACCT at cwsmith@acct.org.