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# Half the FAFSA:

# Cutting the Red Tape to Postsecondary Student Aid

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## EXECUTIVE SUMMARY

The current Free Application for Federal Student Aid (FAFSA), while enabling millions of students to apply for college aid, also presents significant barriers for low-income and first-generation students seeking to attend college. The application process is complicated, resulting in only a 44-percent completion rate for all high school seniors by graduation. This translates into \$24 billion in unclaimed federal aid, including \$2.7 billion in Pell Grants. While previous legislative efforts have sought to reduce FAFSA complexity, the need to simplify and demystify the FAFSA form and financial aid could increase college access and completion.

Other concerned parties, including the National Association of Student Financial Aid Administrators (NASFAA), The Institute for College Access and Success (TICAS), the Council of Economic Advisers with the National Economic Council (CEA & NEC), and the Bill & Melinda Gates Foundation (Gates Foundation), and now the National College Access Network (NCAN), have all explored a simplified FAFSA and the elimination of unnecessary and redundant questions. NCAN's model, the Streamlined FAFSA, was developed and consumer-tested to resolve the current form's shortcomings by reducing completion time, improving accuracy and increasing usability for families and students. These improvements were made while maintaining the original purpose of the FAFSA: to serve as the single, universal and free form to apply for financial aid.

### *The FAFSA: Goal and History*

First created in 1992, the FAFSA is a universal and free electronic form, with 142 questions, that is used by students to apply for financial aid from the U.S. Department of Education, and by institutions and states to allocate other non-federal aid. Prior to the creation of the FAFSA, each state awarding aid had its own form and, on top of that, some institutions had their own forms, resulting in a complicated, multiform and multistep system for students. Since the original paper-based version, improvements have been made. The form has moved online, instituted "skip logic" (the automatic skipping of certain unnecessary questions based on an individual's circumstances), and partnered with the IRS Data Retrieval Tool (IRS DRT). The IRS DRT allows users to import information from their tax returns, thereby simplifying and expediting the process.

### *The FAFSA: Barriers to Completion*

While the creation of the FAFSA eliminated the need for a myriad of different forms and processes to allocate federal, state and institutional aid, today's FAFSA form still presents barriers to college access for many students. FAFSA completion is closely correlated with college enrollment. High school graduates who complete the FAFSA are 63 percent more likely to enroll in college than those graduates who do not fill out the form (ELS, 2002/06).

An NCAN study also shows that there is significant unfamiliarity with the FAFSA application and completion process among 17- to 19-year-olds, with most students who did not apply for aid failing to have any contextual understanding of what aid is or their eligibility for it (NCAN, 2016). FAFSA completion also impacts college completion, with

research finding that filers are 72 percent more likely to persist in college than those who do not file (Novak, Heather & McKinnely, 2011).

NCAN has identified the following factors as the top barriers to FAFSA completion:

- A lack of understanding of financial aid or the application process;
- Overly complex questions and the length of the current FAFSA; and
- The multitude of separate financial and other sources necessary to complete the form.

These issues pose large, sometimes insurmountable, barriers for some students, especially first-generation college students. As discussed earlier, low-income and first-generation students who do not complete the FAFSA often fail to enroll in college or complete a postsecondary education, shortchanging themselves, their families and the American economy. Simplifying the FAFSA in a user-friendly manner that still maintains the free and universal nature of the form is the focus of this brief.

### *A New and Improved Form: The Streamlined FAFSA*

NCAN studied the impact of the current FAFSA to identify how to reduce barriers to its completion. After extensive research, development and testing, NCAN has created and tested a new form, the Streamlined FAFSA, that reduces complexity for student aid seekers, meets the needs of institutions and maintains the integrity and universality of the current FAFSA form.

The Streamlined FAFSA opens with a shortened series of eligibility and demographic questions for the student. With an updated Federal Student Aid ID (FSA ID) and expanded access to the IRS DRT, many identifying and financial questions can be automatically filled in, saving time and reducing errors. Moreover, NCAN's form would eliminate complicated, unnecessary questions, such as driver's license number.

In addition to using existing information from the U.S. Department of Education's Federal Student Aid office and IRS data to auto-complete certain questions, the Streamlined FAFSA decreases the number of questions that applicants must answer by guiding them down one of three pathways:

- *Pathway One:* as few as 20 questions for applicants from families who receive benefits from one of most federal means-tested programs, allowing these individuals to automatically skip all financial questions and receive the maximum Pell Grant award
- *Pathway Two:* as few as 23 questions for applicants who do not participate in a means-tested benefit program and do not have to file tax schedules with their taxes
- *Pathway Three:* as few as 25 questions for applicants who file tax schedules with their taxes

Key to the universality and brevity of the Streamlined FAFSA is its "State Page," which collects the information that certain states need to administer their aid. Filers would be required to fill out this form in states that have opted into the inclusion of these

questions. Students in states that do not require the inclusion of additional questions would move directly to the signature page. The State Page ensures that the Streamlined FAFSA can maintain its universality for all federal and state aid needs.

## *Streamlined FAFSA Results in Increased Completion Rates, Accuracy, Usability and Aid to Needy Students*

NCAN's Streamlined FAFSA outperforms the current form. Independent testing of the NCAN Streamlined FAFSA model examined completion time, error rate, satisfaction and usability. Using the Streamlined FAFSA resulted in:

- up to 50 percent fewer questions that needed to be answered, with as few as 20 questions;
- a 39-percent improvement in completion times;
- a 56-percent lower error rate; and
- greater satisfaction and usability by applicants.

NCAN's efforts also uncovered the importance of organizing the college search process on the form onto a single page, strategically placing the "exit" button on the Streamlined FAFSA, accelerating and simplifying disclosure questions, expanding the IRS DRT to help users identify which tax form they filed, and rewording the language of tax questions to reduce errors.

Additionally, the Streamlined FAFSA increases transparency and reduces the uncertainty in the FAFSA filing process. For example, applicants from families who receive benefits from a federal means-tested program can be certain, prior to dedicating their time and efforts, that they would receive the maximum Pell Grant award – if they enroll full-time. Therefore, in addition to simplifying the application process, the Streamlined FAFSA boosts awareness of student financial aid as well as an applicant's eligibility.

If NCAN's Streamlined FAFSA is implemented as is outlined above, Pell Grant expenditures would increase by approximately \$1.4 billion, a 5.1-percent increase in the cost of the Pell Grant program, which is in line with the other simplification proposals referred to above. Breaking down this 5.1 percent, nearly 80 percent of the increase in Pell Grant expenditures would come from Pathway One Pell Grant recipients. Thus, the Streamlined FAFSA could ensure that our neediest, most vulnerable students have access to the student aid they need for a postsecondary education. Furthermore, simplifying the FAFSA could increase FAFSA completion by 7.4 percent.

## *Conclusion*

With 85 percent of four-year college students receiving some form of financial aid, improving the application process for student aid is crucial. The Streamlined FAFSA maintains the universality and free aspects of the form while significantly reducing completion time and error rates as well as increasing usability for students and families.

## INTRODUCTION

The FAFSA was truly revolutionary when it was first created in 1992. Previously, students around the country had to use multiple forms to apply for federal student aid. For state aid, each state had its own form. Some institutions used a form provided by vendors such as the College Board, while others created their own. The result was a complicated system for students where several forms were needed to apply for aid at each college, on top of scholarship applications. A student applying to four schools in-state could have had up to six financial aid forms: one for federal aid, one for state aid, and four for institutional aid – one for each college. At its origin, the FAFSA was one form for federal, state, and institutional aid, as long as states and schools participated. It has always been free – and that point was so important that policymakers put it in the name. Students would no longer need to pay to find out if they qualified for student aid, and could fill out one form for all aid (Lumina Foundation, 2015).

Since this original innovation, the FAFSA has stayed approximately the same length,<sup>1</sup> moved online, introduced skip logic, and partnered with the IRS DRT to allow users to transfer their financial information. The login and signature portion transitioned with technology to become the FSA ID. And from the form's inception, a portion of students has been required to complete the FAFSA verification process, confirming the information provided on the FAFSA is accurate. The FSA ID, FAFSA form and verification process together comprise the full spectrum of applying for federal student aid, referred to here as “FAFSA completion” to match the commonly used phrase.

Completing the FAFSA is strongly associated with college enrollment and college persistence for high school students. However, only 44 percent of all seniors complete their forms by high school graduation.<sup>2</sup> Those who failed to do so left more than \$2.7 billion in Pell Grant dollars on the table in 2014 (Simons & Helhoski, 2016). And non-filers enrolled in higher education could have received more than \$24 billion through all federal student aid programs, had they completed the FAFSA (Kofoed, 2016). This funding could make a difference for low-income and first-generation students; however, these students are the most likely to miss out on this aid because of the many barriers and complexities inherent in the application process (King, 2004; Feeney and Heroff, 2013; Bettinger, Long, Oreopolous, & Sanbonmatsu, 2012).

Simplifying the FAFSA is one strategy to remove red tape and enhance college affordability for people who may think a postsecondary education is out of their financial reach. The Gates Foundation, NASFAA, TICAS, and the CEA & NEC, for example, call for simplifying the FAFSA by eliminating unnecessary and redundant application questions (Gates Foundation, 2015; NASFAA, 2015; CEA & NEC, 2009; TICAS, 2015). FAFSA simplification proposals from the Gates Foundation and NASFAA, and the idea explored here, take simplification a step further by ensuring that low-income

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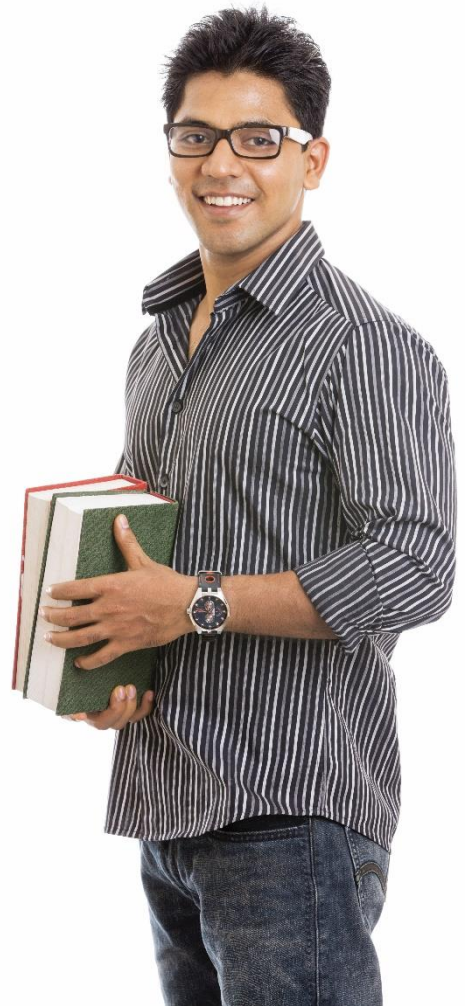
<sup>1</sup> The original FAFSA had 110 questions on the form with 49 questions on accompanying worksheets required to answer the questions on the form, for a total of 159 questions. The current FAFSA has 108 numbered questions but reaches 142 total questions if all questions' lettered subparts are counted.

<sup>2</sup> The number of FAFSA applications by applicants 18 and less through Q2 of 2014 reported in the U.S. Department of Education's FAFSA Data by Demographic Characteristics, 2014-2015 Application Cycle, divided by the number of U.S. high school graduates in 2013-14 estimated by the National Center for Education Statistics.

applicants are not scrutinized simply because they are low-income (Gates Foundation, 2015; NASFAA, 2015). Within these models, applicants are steered down one of three application pathways (or two, in the Gates Foundation proposal) based on their tax filing status and whether they receive means-tested benefits. Students who have low financial strength based on those measures are required to answer only the bare minimum of questions, thereby following a “fast track.”

Over the past nearly quarter-century of FAFSA filing, enhancements have been made to the process and new additions have created more barriers. As the FAFSA nears its 25<sup>th</sup> year of existence, there are still students, and certainly potential students, who could greatly benefit from an easier pathway to financial aid. Any significant changes to the FAFSA should be made with the goal of maintaining its original purpose: to serve as a single universal, free form for student aid for higher education. Additionally, these changes must be considered under the full scope of the full process, including the FSA ID and verification phases.

This brief explores whether it is possible to improve the FAFSA-filing experience for all students – particularly those who are low-income, to encourage use of financial aid and increased college enrollment – while maintaining the original universality of the form and a similar approach to the federal aid methodology, particularly regarding distribution of Pell Grant awards. After a review of why the FAFSA is important and students’ current awareness of federal aid, this brief will explore one possible simplification process: the Streamlined FAFSA, a simplification of the FAFSA form using extreme skip logic and question elimination. To examine whether the Streamlined FAFSA meets the goals outlined above, this brief will review a summary of the results from a prototype user-testing of this method compared to the current FAFSA form, and a cost-analysis of how formula changes required to implement the Streamlined FAFSA will impact the Pell Grant program.



## FAFSA COMPLETION LEADS TO BETTER STUDENT OUTCOMES

Despite the form's complexity, completing the FAFSA provides many benefits for students. Data from the 2002 Educational Longitudinal Study show a strong correlation between FAFSA completion and college enrollment: 90 percent of high school seniors who completed the FAFSA immediately enrolled in a post-secondary institution after graduation, compared to just 55 percent of FAFSA non-completers. Collectively, high school seniors who complete the FAFSA are 63 percent more likely to enroll in postsecondary education. When these data are disaggregated, they show that FAFSA completion narrows the college enrollment gap between low- and high-income students<sup>3</sup>:

- 29 percent of low-income students who did not complete the FAFSA enrolled in a post-secondary institution, compared to 83 percent of high-income students (ELS, 2002/06, Table 2).
- 81 percent of low-income students who completed the FAFSA enrolled in a post-secondary institution, compared to 96 percent of high-income students (ELS, 2002/06, Table 1).

In their report, *Timing Financial Aid Applications*, Cannon and Goldrick-Rab identified that “opportunities for confusion and under-informed decision-making” are present in the financial aid planning and application process because of the necessity of applicants understanding federal, state, and institutional policies (2015). This need to grasp the application process, in combination with the complexity of the FAFSA itself – including the length of the form and number of separate sources needed to complete the FAFSA – poses a barrier for students (Dynarski & Wiederspan, 2012; Bettinger et al., 2012; Cannon & Goldrick-Rab, 2015; Dynarski & Scott-Clayton 2006). Often, students are required to draw on available personal networks for resources and assistance when completing the FAFSA, which can be difficult for first-generation college students whose parents are more likely to be unfamiliar with the application and financial aid system (ACSFA, 2002; Feeney & Heroff, 2013).

Many applicants or potential applicants are unfamiliar with the existence of financial aid, creating another barrier. Using both qualitative and quantitative methods, NCAN investigated what 17- to 19-year-olds' perceptions of financial aid eligibility are. The results showed that students are either greatly misinformed or completely uninformed about financial aid for postsecondary schooling: Most students who did not apply for aid did not have any contextual understanding of what aid was, let alone their eligibility (NCAN, 2016).

In a similarly focused study, New America notes that 92 percent of undergraduates who come from households with an Adjusted Gross Income of \$50,000 or less are awarded a Pell Grant when they complete the FAFSA (Fishman, 2015). However, the think tank's own research revealed that only 42 percent of students from the same income bracket

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<sup>3</sup> Following the U.S. Department of Education's data, income level is divided into quartiles: low-income students are the lowest quartile; high-income students are the top quartile; middle-income students are the middle two quartiles.

were familiar with the Pell Grant, and 27 percent had never heard of Pell (Fishman, 2015).

Another study, out of Harvard University, sought to raise awareness of eligibility and provide assistance in FAFSA completion. Conducted by student aid experts in partnership with H&R Block, the results demonstrated that application assistance can help raise awareness of financial aid and minimize the difficulties that prevent some students from obtaining aid (Bettinger et al., 2012). The authors of the study conducted a randomized field experiment in which low-income adults receiving tax preparation help were also offered immediate personal assistance to complete the FAFSA for themselves or their two children. Participants who received personal assistance in completing the FAFSA were significantly more likely to receive financial aid, attend a postsecondary institution, and persist at that institution (Bettinger et al., 2012).

College persistence is also closely related to FAFSA completion. Research shows that FAFSA filers are 72 percent more likely to persist in college than their peers who do not file (Novak, Heather, & McKinnely, 2011). These authors also demonstrate that Pell-eligible students who completed the FAFSA have a 122-percent greater likelihood of persisting in college than their peers who do not complete the form.

There is no silver bullet to address the college access and success barriers and equity gaps in this country. However, the research on FAFSA completion demonstrates that students who complete the form have better higher education outcomes. Simplifying the FAFSA so that more students complete it could broaden the number of students with access to these improved outcomes.



## NCAN TESTS A STREAMLINED FINANCIAL AID APPLICATION PROCESS

To receive financial aid for higher education, a student must complete the full financial aid application process. This includes establishing an FSA ID, submitting the FAFSA form and completing the verification process, if selected. Streamlining this entire process could remove barriers to help more low-income students access the aid they need to make college more affordable.

### *Step One: Improve the FSA ID*

In May 2015, the FSA ID replaced the Federal Student Aid PIN to ensure increased security. This username and password system that parents and students must use to access, complete, and electronically sign Federal Student Aid documents complicated the application process. Without an FSA ID, students and their parents must either print signature pages and mail them to Federal Student Aid, or complete the entire FAFSA on paper. The FSA ID replaced an older, less secure system, but the new process created unintentional barriers for students in the name of security. In the first year, students struggled to remember their complicated passwords, frequently created for the first time for this process. Low-income students in particular struggled to find security questions they could relate to, making it difficult to accurately remember the answers. Parents were creating new email addresses just to set up an ID, then forgetting those new addresses. While evidence of causation isn't available, it should be noted that overall FAFSA submissions decreased 3.5 percent from January through June 2016 in comparison to the prior year (Argenti, 2016; FSA, 2016b). Further, FAFSA completions by high school seniors through April 2016 decreased by 3.2 percent (Warick, 2016a).

An internal Federal Student Aid newsletter, *Federal Student Aid Customer Experience Dashboard (Winter 2016)*, which NCAN obtained through a Freedom of Information Act request, demonstrated that the tedious process caused increases in FAFSA completion times. In January and February of the 2016-17 FAFSA cycle, average completion time for dependent students rose by nine minutes (20 percent) for first-time filers and nearly six-and-a-half minutes (23 percent) for application renewals. First-time independent filers experienced an increase of almost four minutes (17 percent), while independent FAFSA renewal applications averaged about a 30-second increase (3 percent) (FSA, 2016b). These increases represent a bump from 2015-16, when times rose only slightly over 2014-15.

<b>Application Completion Time (minute:second)</b>	<b>2014-15</b>	<b>2015-16</b>	<b>2016-17</b>
<b>Original FAFSA submission</b>			
Independent	22:38	23:02	26:57
Dependent	42:46	44:58	53:59
<b>Renewal FAFSA</b>			
Independent	16:09	16:10	16:36
Dependent	28:42	28:07	34:30

SOURCE: *Federal Student Aid Customer Experience Dashboard, Winter 2016*

Much-needed improvements are coming to the FSA ID process in the spring of 2017. Students will be able to reset their passwords using text messaging. Additionally, passwords reset through the security question process will no longer be subject to a 30-minute lockout window, a period particularly difficult for students when waiting could mean missing an important opportunity to fill out the FAFSA with an advisor or school counselor, or during a financial aid workshop. College access practitioners suggested these changes will be beneficial to students (Warick, 2016b).

Implementing these changes is crucial to streamlining the financial aid application process. A smoother FSA ID system can decrease frustration as students begin the FAFSA form, and could also create opportunities to use FSA ID information to auto-fill the FAFSA form.

### *Step Two: Trim the FAFSA Form*

Considering the barriers and original purpose of the FAFSA form, it would be easy to conclude that meeting all of its goals – to accurately distribute aid dollars and serve as one form to all people – does not lend to itself to a simplified process. But user-testing and cost analysis show that there is at least one way to streamline the FAFSA and still achieve these outcomes. The goal of the Streamlined FAFSA is to design the form to stop asking low-income families to repeatedly prove that they are poor, while simplifying the process for all students and maintaining the integrity and universality of the form. This approach steers applicants down one of three application pathways based on their tax filing status and whether they receive means-tested benefits.

The Streamlined FAFSA trims a form with 142 questions and subparts to one that can range from 20 to 45 questions with another 16 to 24 questions automatically completed for the filer. Even without auto-filled questions, the form would not be longer than 69 questions. Further, it improves the form's completion time across all groups by 39 percent and decreases the error rate by 56 percent. (A more detailed discussion of the user-testing results will follow in this brief's Performance section.)

The Streamlined FAFSA opens with a shortened series of eligibility and demographic questions for the student. Many identifying questions could be automatically completed for the applicant, and the updated FSA ID would facilitate this improvement. Although setting up an FSA ID first would not be required, it would be highly encouraged to maximize the number of auto-filled questions. The remaining questions in this section would determine an applicant's eligibility for federal student aid. Students would indicate the degree they are seeking, which schools should receive their FAFSA, and whether they are independent or dependent. This first section, the only one all applicants would complete, would end with the question about receipt of federal means-tested benefits. Moving forward, extreme skip logic would guide students down one of three pathways, depending on their financial situation.

Questions included in the current form but omitted from the Streamlined FAFSA's student demographics and eligibility section include driver's license number, repetitive identification questions, and drug conviction questions. Removing the latter question would also require a change in the eligibility rules. For a full list of FAFSA questions removed in each pathway, please view the Appendix, sections A, B and D.

# Streamlined FAFSA



## Pathway One: Families With Means-Tested Benefits

Families enrolled in one of the following federal means-tested benefit programs will automatically skip all financial sections of the FAFSA form and move directly to the end of the application:

- Supplemental Security Income (SSI)
- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families (TANF)
- Special Supplemental Nutrition Program for Women, Infants and Children (WIC)
- Medicaid (\*included in user-testing, but not cost analysis)

Students filling out the optional State Page (explained later in this report) must complete that additional section before signing the form. Students for whom this section is not required would move directly to the signature page. As these students have already demonstrated that their families are needy through a means-tested benefit program, they will automatically receive a full Pell Grant award and an Expected Family Contribution (EFC) of \$0 without having to provide the complicated financial information that frequently trips up low-income applicants. All students, whether independent or dependent, would be eligible for the automatic full Pell Grant and the Auto Zero EFC

recommended here. This would establish a new threshold for the Auto Zero EFC, which would not only make students eligible for the full Pell Grant, but could also make them eligible for additional aid from other sources. Further, this approach has an added benefit of allowing students receiving means-tested benefits to know that they will receive a full Pell Grant for full-time enrollment before they begin the form. This information would be an important part of financial aid awareness and outreach efforts.

<b>Table 1: Questions auto-filled by FSA ID (numbered for 2016-17 paper FAFSA)</b>
1. Last name
2. First name
3. Middle initial
4. Permanent street address
5. City
6. State
7. Zip code
8. Social Security Number
9. Date of birth
10. Telephone number
13. Email address
61. Parent 1 Social Security Number
62. Parent 1 last name
63. Parent 1 first initial
64. Parent 1 date of birth
70. Parents' legal state of residence

The changes in this section result in students answering as few as 20 questions. The full list would include 16 auto-filled questions and 20 to 35 questions requiring manual answers (making for a total of 36 to 51 questions in this section).

The only means-tested benefit program listed on the current FAFSA that is not included in this group is Free and Reduced Price School Meals. Including this benefit in the “automatic” full-Pell category moved several high-earning families who receive reduced-priced lunch into this category. This increased the cost of the Pell Grant program more significantly than intended. The move to expanded community eligibility for free-lunch programs also could confuse students, considering some

participate in the program due to the poverty level in their school rather than their own family circumstances. For these reasons, recipients who only receive this means-tested benefit and no others would need to move on to the second category to determine their EFC and possible Pell Grant. Families whose students receive free and reduced price lunches and also move on to Pathway Two or Three can still receive a partial or full Pell Grant, but they would need to go through the financial calculation to determine if the student is eligible for the award.

In addition to the above families, there are two other notable types of student who may receive a full Pell Grant, but will need to go through Pathway Two. Non-tax filers who do not receive a means-tested benefit will enter Pathway Two, but could still receive a Pell Grant based on their EFC. Also, families who live in states with less generous means-tested benefit programs – particularly given the variance across states in the Medicaid program – could still receive a Pell Grant in this manner. But because Pathway Two, as discussed below, closely mimics the current simplified needs test, any student falling into one of these categories could still receive a Pell Grant based on their EFC.

## Pathway Two: Families Without Means-Tested Benefits

Aid applicants who do not qualify for an Auto Zero EFC based on the means-tested benefit question will move into Pathway Two in the Streamlined FAFSA, more or less the student finances section of the existing FAFSA form. The goal for this section is to evaluate the financial strength of the student and, for dependent students, the family. Some families in this path may still receive a full or partial Pell Grant or qualify for other aid such as subsidized Stafford Loans. Families with or without tax schedules will complete this portion of the form, with families who file tax schedules moving on to Pathway Three. Families without tax schedules (and those few families who do not qualify to file taxes but also do not receive a federal means-tested benefit) would move directly to the signature page after Pathway Two (or to the State Page, if applicable).

Those applicants whose FAFSA ends on this pathway will answer as few as 23 questions, plus 24 that are auto-filled from either the FSA ID or the IRS DRT. At most, students in this section would answer 43 questions and have 24 completed through the data transfer.

The goal of Pathway Two is to offer a simpler financial form for moderate- and middle-income families.

Protections in the current FAFSA, such as an automatic full Pell Grant for

families with an adjusted gross income under \$23,000, would still remain – should those families find themselves in this pathway. The current FAFSA also employs a simplified needs test for families earning under \$50,000 a year, which removes the asset questions from the form using skip logic. Because Pathway Two eliminates these questions or moves them to Pathway Three, the simplified needs test would only be necessary for families who file tax schedules and earn less than \$50,000; however, the Simplified Needs Test was not used as part of the cost analysis.

In addition to the change in questions for Pathway Two, the Streamlined FAFSA also expands the pool of applicants to whom the IRS DRT is available. Currently, families who are married filing taxes separately, file taxes as head of household, or file the amended tax form 1040X are not eligible to use the IRS DRT. The Streamlined FAFSA includes all of these groups. Granting access to the IRS DRT for families who are married filing separately can be achieved with back-end technology that stores two sets of information and adds them together for certain lines on the FAFSA. And for families filing the 1040X form, the switch to using income from two years ago instead of only one, known as “prior-prior year” income, means they too can now use the IRS DRT, as long as they file the FAFSA at least 12 weeks after filing their amended form. This change was made in the Streamlined FAFSA and is coming to the actual FAFSA for the 2018-19 academic year (DiCarlo & Parkinson, 2016).

**Table 2: Questions auto-filled by IRS DRT (numbered for 2016-17 paper FAFSA)**

36. <i>Student AGI</i>
37. <i>Student income tax</i>
38. <i>Student exemptions</i>
44a. <i>Student AOTC/Lifetime Learning Credit</i>
85. <i>Parent AGI</i>
86. <i>Parent income tax</i>
87. <i>Parent tax exemptions</i>
93a. <i>Parent AOTC/Lifetime Learning Credit</i>

Questions removed from this section include those answered by fewer than 1 percent of applicants (CEA & NEC, 2009) and others that cause more trouble for students than value-added to the form. Necessary asset questions are moved to Pathway Three and discussed later in this brief.

**Table 3: Questions Removed Due to <1% of Filers Giving Non-zero Answer (numbered for 2016-17 paper FAFSA)**

43. Student net worth of businesses and/or farms
44c. Student taxable earnings from need-based employment like work-study
44e. Student combat pay
44f. Student cooperative education program earnings
45b. Student IRA deductions
45d. Student tax exempt interest income
45e. Student untaxed portions of IRA distributions
45f. Student untaxed portions of pensions
45g. Student military/clergy living allowances
45h. Student veterans noneducation benefits
45i. Student other untaxed income
93b. Parent child support paid
93c. Parent taxable earnings from need-based employment like work-study
93d. Parent college grant/scholarship aid reported to IRS
93e. Parent combat pay
93f. Parent cooperative education program earnings
94b. Parent IRA deductions
94d. Parent tax exempt interest income
94e. Parent untaxed portions of IRA distributions
94f. Parent untaxed portions of pensions
94g. Parent military/clergy living allowances
94h. Parent veterans noneducation benefits
94i. Parent other untaxed income

When meeting the goal of FAFSA simplification, enough information must be retained so that state grant aid agencies and institutional financial aid administrators can still use the form to distribute their aid dollars. For this reason, certain questions were maintained to keep the universality of the form, not to suggest they should be part of the federal methodology. Key questions in this category include the parent financial question regarding child support received and the question regarding the American Opportunity Tax Credit (AOTC) and Lifetime Learning Credit.

The question regarding child support received addresses income and is frequently used by financial aid administrators, who indicated that omitting this question could be a “tipping point” pushing institutions to use their own form or a private form to evaluate students for institutional aid. That is because significant resources can be transferred via child support in upper-income, divorced families. Another question about child support paid, however, was removed because it is rarely answered. It is unlikely that the parent paying child support is also the one listed on the FAFSA, given that the parent listed on the FAFSA is the custodial parent, and the parent paying child support is the non-custodial parent.



Questions regarding parent child support paid and the AOTC both help decrease the amount of income that is considered when calculating an applicant’s EFC. The Streamlined FAFSA does not treat each of these questions equally, however. Those questions that affect fewer than 1 percent of filers were removed even if they provide a benefit to a few. The AOTC question was retained not only because it affects more than 1 percent of filers, but because it is another question upon which financial aid offices heavily rely, and removing it would disrupt the universality of the form. Keeping it also serves to help protect the amount of available income considered toward the EFC of those who do file the tax credit.

To keep the universality of the form, other questions most crucial for state and institutional aid distribution were also maintained. Appendix C outlines the questions that are needed to conclude a student is eligible to receive a specific type of federal student aid, as well as those needed for the federal methodology, which determines EFC. The chart also highlights which questions are retained in the Streamlined FAFSA.

## Pathway Three: Tax-filing Families With Schedules

Families who file tax schedules will have just two additional questions to answer beyond the first two sections of the Streamlined FAFSA. While neither the full 1040 nor the tax schedules would be transferred, the IRS DRT would recognize the forms and trigger the FAFSA to present the two additional questions, while also informing colleges and universities that this student or family files tax schedules.

The first additional question asks for the combined balance of all cash, checking and savings accounts. The second asks for assets in the form of real estate (excluding the primary residence), family businesses and/or farms. These families or students, who account for fewer than 25 percent of tax filers (Gates Foundation, 2015), will answer a total of 49 to 69 questions, 24 of which will be auto-filled from either their FSA ID or the IRS DRT.

## Optional State Page

The last section of the Streamlined FAFSA is the State Page, which includes eight questions that states use to administer their aid. If a state chooses to opt into this additional section, students who are residents there would be required to complete the questions. If a state opts out, the section would not appear to the student. States would be allowed to change their opt-in or opt-out every three years, and must accept the full list of state questions without being able to add their own. This will protect the balance between a universal form and a manageable workload for the Office of Federal Student Aid.

The questions in this section are non-financial ones that can be confusing to students and are not used for the federal methodology. The goal of moving these questions to a State Page rather than omitting them entirely is to eliminate the burden for students who live in states that do not use this information, while retaining the information for states that do need it to distribute their aid – thus preventing the need for the latter states to create their own financial aid form. Further, because none of these questions are financial in nature, institutions that may wish to know the information – particularly those with many out-of-state students – will easily be able to add them to other forms, such as admissions ones.

**Table 4: Questions to Move to State Page  
(numbered for 2016-17 paper FAFSA)**

18. Student state of legal residence
20. Student move date to state of legal residence
24. Highest education completed by parent 1
25. Highest education completed by parent 2
26. High school completion status upon starting college
29. Grade level at beginning of academic year
30. Degree or certificate pursued
72. Parent move date to state of legal residence

### *Step Three: Reduce Verification*

Once the U.S. Department of Education receives students' submitted FAFSAs, officials flag some applications for colleges to "verify." The information on these FAFSA forms cannot be used to award any type of federal financial aid until this additional confirmation process is complete. As outlined in a recent TICAS report, this process is burdensome for students and can cause significant delays in their ability to access student financial aid (TICAS, 2016). Any changes to the FAFSA must take this process into account so that simplification of the form does not create more strenuous verification requirements. Those additional steps are stressful for students, but also consume valuable time that college advisors, school counselors, and financial aid administrators need to focus on more crucial aspects of their jobs (TICAS, 2016).

Most often, students flagged for verification are Pell-eligible, and may have little support or context to help them through the additional process of resubmitting and providing additional documentation (TICAS, 2010). In the 2014-15 FAFSA cycle, 5.3 million students – 26 percent of all applicants – were required to submit additional verification paperwork after they filed the FAFSA (TICAS, 2016). There are no publicly available data regarding the number of students who successfully complete the verification process, and more detailed information would contribute to next steps in improving the entire financial aid application process. Verification is part of the larger phenomenon referred to as summer melt, where anywhere from 10 percent to 40 percent of students presumed to be heading to a college do not matriculate in the fall (Castleman & Page, 2014).

Either the Department or an institution can flag a student for verification, requiring them to submit additional documentation to support a portion of their FAFSA form. In previous years, in cases where the Department flagged more than 30 percent of an institution's student body, the Department allowed institutions to cease verification once they hit that threshold. In 2012, the ceiling was removed, and institutions are now required to verify all students who are flagged to go through the process (FSA, 2016c). A reasonable ceiling should be reinstated to find a balance between watching for errors in FAFSA forms and not requiring students – frequently those who are low-income and selected each year – to continually go through more hoops to access higher education.

A final note on verification: Any expansion of the IRS DRT should help decrease the proportion of students flagged for the process because financial information from the IRS DRT is considered automatically verified. In this first year of so-called Early FAFSA, where already completed tax forms are the basis for the financial questions, the proportion of filers using the IRS DRT should increase. Ideally, this increase would also reduce the portion of students selected each year. However, common verification flags for household size and number of family members in college will continue to burden students regardless of the IRS DRT. Additional data showing the impact of verification on adjustments to EFC could help determine how much of this process is needed to properly prevent abuse in the system.

## STREAMLINED USER TESTING SHOWS IMPROVEMENTS OVER FAFSA

Using the simplification framework outlined here, an online prototype for the Streamlined FAFSA was built and tested with potential students. The user-testers were recruited to match five profiles of student: dependent receiving federal means-tested benefits; dependent with a single parent; dependent with married parents; dependent with married parents who have assets; and single, independent student. These users were divided into two similar groups of students (with parents, in the case of dependents), creating a control group and a test group. Users did not know to which group they were assigned. The control group completed the 2016-17 DEMO FAFSA online and the test group completed the Streamlined FAFSA via the prototype tool. These users were randomly selected, are not associated with NCAN, were compensated for their time and received informational brochures at the end of the interview to guide them through completing the actual FAFSA. Complete findings from authors Ben Harper and Iva Stoyneva of ICF International are available at [www.collegeaccess.org/fixfafsa](http://www.collegeaccess.org/fixfafsa).

### *Performance: Faster and More Accurate*

The user-testing experiment conducted in the fall of 2016 found that students who completed the Streamlined FAFSA as part of the test group finished the application 39 percent faster and made 56 percent fewer errors than the control group (Harper & Stoyneva, 2016a). Streamlined FAFSA completers also reported being more satisfied with the process at a statistically significant rate. These results provide evidence that FAFSA simplification as detailed here can achieve the goals of a faster and easier form for students while still maintaining quality in the data collected.

Every group examined improved their FAFSA completion time with the prototype. Low-income students were able to complete the Streamlined FAFSA in half the time: an average of seven-and-a-half minutes, compared to almost 16 minutes in the control group. Students with married parents filing taxes without schedules finished the Streamlined FAFSA in just over 12 minutes on average, well below the 21-minute average logged on the existing form (Harper & Stoyneva, 2016a). Note that because financial profiles were provided to each student, and the risk of incorrect answers did not carry a penalty, the total times should not be viewed as replications of real-life FAFSA filing times, which average 19 minutes and 43 seconds but vary greatly for first-time filers, from 32 minutes and 50 seconds for dependent filers to 16 minutes and 24 seconds for independent filers (See Appendix for a full list of FAFSA filing times [FSA, 2016a]). However, because both groups of students were provided the same situation and information, the average completion time decrease of 39 percent is an encouraging demonstration of the Streamlined FAFSA's potential.

Examining completion times across the three major sections in each form (student eligibility and demographics, student finances, and parent demographics and finances) reveals a statistically significant reduction in completion time for Streamlined FAFSA testers. This breakdown is important to note because those filling out the DEMO FAFSA (the control group) had to manually enter financial information, while those completing the Streamlined FAFSA (test group) used a replicated IRS DRT. Unfortunately, it was

not possible to replicate the DRT in the testing environment for the control group without having users complete the actual FAFSA on-site. While it is not possible to determine how much of the completion time reduction among the test group was due to users answering fewer questions or using the DRT, it's notable that testers also filled out the student demographics section – which did not use the DRT – significantly faster than the control group.

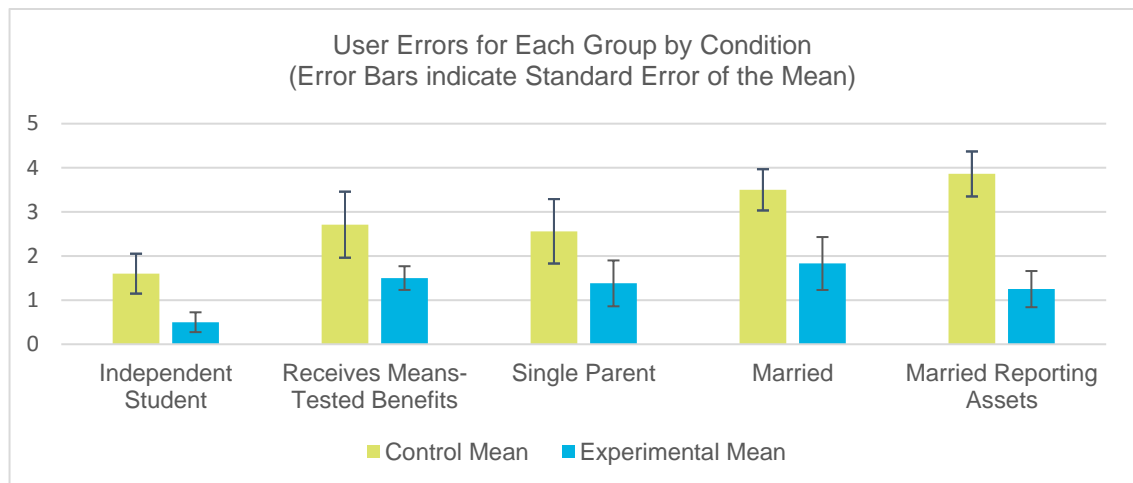
Table 5: Average Time of Completion by Condition and Group		
Groups of Users	DEMO FAFSA (control)	Streamlined FAFSA (test)
	Mean Time (Min:Sec)	Mean Time (Min:Sec)
Independent Student	11:27	6:35
Receives Means-Tested Benefits	15:47	7:36
Single Parent	16:17	13:40
Married	21:18	12:21
Married Reporting Assets	21:00	13:12

The chart above shows significant reductions in completion times among several student groups of interest; however, every group benefited from the streamlined form.

In addition to studying completion times for the Streamlined FAFSA, this experiment also reviewed errors committed. Harper and Stoyneva recorded an error “every time the user purposely submitted erroneous data to the system regardless of whether the system produced a validation error” (2016b). Test group users who completed the Streamlined FAFSA committed a mean of 1.23 errors, fewer than the mean of 2.82 errors committed by the control group completing the DEMO FAFSA (Harper & Stoyneva, 2016b). This means the Streamlined FAFSA users committed 56 percent fewer errors than their control group counterparts, as demonstrated in Figure 1 below.

Shorter completion times and fewer error rates across the board can be attributed to the Streamlined FAFSA’s expanded access to the IRS DRT, elimination of questions with complicated or confusing financial terms, and ability to auto-fill financial information from the IRS. Further, only 46 percent of dependent students’ parents used the IRS DRT in 2014-15, showing that a FAFSA designed to increase IRS DRT use would also help shorten completion times (FSA, 2016a).

**Figure 1. User Errors for Control and Experimental Conditions Across User Groups**



The Streamlined FAFSA did not address all problems identified in the 2016-17 FAFSA, however. In particular, both forms included questions written in the second person and addressing the student. Even with various approaches to color-coding or section labeling, when the form switched from addressing students to addressing parents, users – especially students – became confused and were more likely to enter incorrect information on behalf of the wrong person.

A problem that remains unresolved is the institutional search tool, which adds colleges to a list that will receive a student’s FAFSA information. This search tool was updated in the prototype, but the changes did not result in improved usability. This is discussed below.

### *Usability Recommendations*

This study also had participants examine the usability of each form and outline a series of recommendations for improving both the existing FAFSA form and the Streamlined FAFSA. In some cases, the Streamlined FAFSA form improved usability, and in others, problems with the current FAFSA were not addressed. Both forms’ use of the pronoun “you” confused users, as it was not always clear whether “you” referred to the student or the parent – despite the fact that both forms indicate as much by placing “student” or “parent” in the page header. Users defaulted to thinking “you” meant themselves, even if the student was answering questions directed at the parent, or vice versa.

In hopes of providing usability improvements, the Streamlined FAFSA rearranged the tool with which applicants select colleges to receive their form, but it created a different set of problems. On the existing form, students frequently could not find their school if the school list surpassed one page, or they clicked the “exit” button by accident instead of the “next” button. On the Streamlined FAFSA, students were confused by the page separation in the search process. Keeping the search on one page, but making action buttons more clear and placing them far away from any buttons that could cause errors, especially the “exit” button, will help prevent errors.

In cases where new questions appear based on a given answer, a frustrating and confusing occurrence to users, the Streamlined FAFSA made usability improvements over the existing form. The Streamlined FAFSA reduces the number of questions and moves the various options into a “check all that apply” format. However, some users thought they were required to pick at least one. Adding a “none of the above” option to this style of question would address the problem.

The usability study suggests that users are not well-informed about the differences between individual tax forms, including what information they contain and where to find it. Identifying which tax form a user has filed and providing guidelines for that form – for example, the IRS DRT could trigger help text based on the tax form filed – would be one solution to this problem. With the expansion of the IRS DRT suggested in the Streamlined FAFSA, making this usability improvement should be possible.

Users also struggled with the question regarding the 1040X form, as many did not know which type of 1040 form they filed. This question is used in the existing FAFSA to steer families with amended tax forms away from the DRT, because they are not eligible to use it. But with the FAFSA’s recent switch to using prior-prior year income, families with amended tax forms should be allowed to access the IRS DRT, and this question could be eliminated, as the Streamlined FAFSA suggests.

The income tax paid question also led to many errors. Families frequently re-entered their income here, overlooking the tax element of the question. Researchers suggest rewording this question to exclude the word “income,” if possible.

## **COST ANALYSIS: SMALL INCREASE IN PELL EXPENDITURES**

A primary goal of the Streamlined FAFSA is to make the process faster and easier so more students access federal financial aid. While students already receiving federal aid would also benefit and should not be made to jump through hoops, simplification’s true objective is to increase access to the \$2.7 billion in Pell Grants that are left on the table each year by students who are not completing the form. Further, students who never fill out the form cannot truly know whether college is affordable to them. With those goals in mind, reviewing FAFSA simplification’s impacts on the cost of the Pell Grant program gives the best estimate for how much implementing these changes would cost.



The table below outlines the estimated costs to the Pell Grant program if the Streamlined FAFSA were implemented. Using the same methods from their study with Sandy Baum, *Simplifying Federal Student Aid: How Do the Plans Stack Up?*, Kim Reuben and Sarah Gault of the Urban Institute conducted this cost analysis using data from the 2011–12 National Postsecondary Student Aid Survey (NPSAS) and from Federal Student Aid’s Central Processing System (CPS) for the same year. Examining the same group of students, who would have received \$28.3 billion in Pell Grants during the 2011-12 year, the table below shows that they would receive \$29.8 billion in Pell Grants under the Streamlined FAFSA. This represents a 5.1-percent increase in the Pell Grant program’s cost, an increase of \$1.4 billion in annual Pell Grant spending. This cost increase is in line with those in other FAFSA simplification proposals, including the Gates Foundation’s (\$1.6 billion) and NASFAA’s (\$0.73 billion).

Further disaggregating that finding provides a clearer picture of where the cost increase would occur, and who it would affect. Of the total 5.1-percent cost increase, 4 percent would go toward Pell Grant recipients on Pathway One. (The Pathway One estimate does not include families receiving Medicaid but no other means-tested benefits, because those data are not available in the NPSAS survey used to calculate these cost increases, but the overall estimate does.) Only 1.1 percent of program growth from the Streamlined FAFSA takes place in Pathways Two and Three. That means these proposed changes to the FAFSA are properly targeted to the students who need them most: those already receiving federal means-tested benefits.

**Table 6. Pell Grant Program Expenditures Under Streamlined FAFSA, With No Increase in FAFSA Filing**

Streamlined FAFSA Pathway	Baseline Estimate of Actual Pell	Streamlined FAFSA Proposal	Increase in Cost Over Baseline	Percentage of Cost Increase
One – Means-tested Benefits	\$10,563,820,224	\$11,697,569,243	\$1,133,749,019	4.00%
Two – No Schedules	\$17,255,642,958	\$17,558,210,085	\$302,567,127	1.07%
Three – Tax Schedules	\$505,042,242	\$514,394,671	\$9,352,429	0.03%
<b>Total</b>	<b>\$28,324,505,424</b>	<b>\$29,770,173,999</b>	<b>\$1,445,668,575</b>	<b>5.10%</b>
<small>*Estimates are for students in CPS 11-12, attending one institution, with non-missing actual EFC (and non-missing info needed to calculate EFC). Students who are Pell-eligible but do not receive actual Pell, or who are not Pell-eligible but do receive actual Pell, have also been dropped. Enrollment intensity adjustment follows that of Dynarski et al., using the ratio of actual Pell to the full-time baseline estimate of actual Pell to determine the intensity.</small>				

The primary goal of simplification is to increase FAFSA completion, particularly for low-income students who do not realize they qualify for aid or who have not enrolled in college due to affordability concerns. Previous examinations of simplification efforts from Dynarski and Scott-Clayton estimate FAFSA completion rate increases of 5.6 percent to 7.4 percent if the FAFSA is simplified in a way where families can estimate their Pell Grant using a table based on adjusted gross income (The Hamilton Project, 2015). Similar increases can be anticipated among the Pathway One population, given that this

simplification effort would allow families receiving federal means-tested benefits to know they will receive a full Pell Grant for enrolling full-time. When predicting an aggressive 10-percent increase in filing rates among this group, the estimated cost of the Pell Grant program increases by \$2.6 billion, which is still less than 10 percent of the overall baseline cost of the program.

**Table 7. Pell Grant Program Expenditures Under Streamlined FAFSA, With 10-Percent Increase in FAFSA Filing in Pathway One**

Streamlined FAFSA Pathway	Baseline Estimate of Actual Pell	Streamlined FAFSA Proposal - FAFSA Filing Increase	Increase in Cost over Baseline	Percentage of Cost Increase
One – Means-tested Benefits	\$10,563,820,224	\$12,867,326,167	\$2,303,505,943	8.13%
Two – No Schedules	\$17,255,642,958	\$17,558,210,085	\$302,567,127	1.07%
Three – Tax Schedules	\$505,042,242	\$514,394,671	\$9,352,429	0.03%
<b>Total</b>	<b>\$28,324,505,424</b>	<b>\$30,939,930,923</b>	<b>\$2,615,425,499</b>	<b>9.23%</b>
<p>*Estimates are for students in CPS 11-12, attending 1 institution, with non-missing actual EFC (and non-missing info needed to calculate EFC). Students who are Pell eligible but do not receive actual Pell, or who are not Pell eligible but do receive actual Pell, have also been dropped. Enrollment intensity adjustment follows that of Dynarski et al., using the ratio of actual Pell to the full-time baseline estimate of actual Pell to determine the intensity.</p>				

Finally, as discussed previously, the Streamlined FAFSA will change the overall cost of the Pell Grant program. It is also important to examine how these changes impact specific groups of students. The change to an EFC of \$0 and a full Pell Grant for families receiving a means-tested benefit will cause some students' Pell awards to increase. However, the elimination of some questions could cause other students' Pell awards to go down in size. The table below outlines the shift in average size of Pell Grant award by income band. Of more than 8.3 million students, 90 percent (7.5 million students) would see a change of less than \$500 in their Pell Grant award size. Approximately three-quarters of the students who would see a change would receive a larger Pell Grant. Only 2.16 percent would see their Pell Grant decrease by more than \$500, and fewer than half of 1 percent would lose their Pell Grant entirely. Additionally, the majority of the shifts, particularly where a grant is lost, occur at the upper end of the middle-income spectrum. The size of the Pell Grant is mostly stable for low-income families.

**Table 8: CPS Sample 2011-12\* Summary of Change in Pell Amounts  
Among Current Pell Recipients in the CPS**

Adjusted Gross Income	Weighted Count	No change (within \$500)	Direction of Change			Within \$1000
			Larger Pell	Smaller Pell		
				Lose Pell		
<b>\$0</b>	1,071,815	95.93%	3.79%	0.28%	0.11%	98.55%
<b>\$1-\$5,000</b>	805,573	96.63%	3.11%	0.25%	0.02%	98.13%
<b>\$5,001-\$10,000</b>	913,109	95.72%	4.18%	0.1%	0.07%	98.72%
<b>\$10,001-\$15,000</b>	1,055,007	90.92%	7.84%	1.24%	0.09%	95.48%
<b>\$15,001-\$20,000</b>	982,481	88.88%	9.38%	1.73%	0.19%	92.37%
<b>\$20,001-\$25,000</b>	769,178	90.04%	6.06%	3.9%	0.65%	94.22%
<b>\$25,001-\$30,000</b>	628,623	85.32%	5.25%	9.43%	1.48%	92.86%
<b>\$30,001-\$35,000</b>	468,403	88.37%	7.45%	4.18%	0.28%	94.23%
<b>\$35,001-\$40,000</b>	390,884	86.52%	11.62%	1.86%	0.34%	92.59%
<b>\$40,001-\$50,000</b>	609,847	83.61%	14.82%	1.57%	0.29%	90.08%
<b>\$50,001-\$60,000</b>	342,438	82.53%	15.47%	1.99%	0.54%	90.54%
<b>\$60,001-\$80,000</b>	247,171	81.33%	15.2%	3.47%	2.07%	89.38%
<b>\$80,001-\$100,000</b>	27,693	86.1%	6.08%	7.82%	4.13%	89.07%
<b>&gt; \$100,000</b>	2,046	100%	0%	0%	0%	100%
<b>Total</b>	8,314,267	90.37%	7.47%	2.16%	0.36%	94.8%

\*Estimates are for students in CPS 11-12, attending one institution, with non-missing actual EFC (and non-missing info needed to calculate EFC). Students who are Pell eligible but do not receive actual Pell, or who are not Pell eligible but do receive actual Pell, have also been dropped.  
Enrollment intensity adjustment follows that of Dynarski et al., using the ratio of actual Pell to the full-time baseline estimate of actual Pell to determine the intensity.

## LESSONS LEARNED: OPPORTUNITIES FOR IMPROVEMENT

Creating and testing the Streamlined FAFSA was a learning process, throughout which one major change was made and several others surfaced as possible future changes. The major change, explained earlier in this brief, was to move Free and Reduced Price School Meals recipients who do not receive any other federal means-tested benefits from Pathway One to Pathway Two after reviewing the cost analysis. Other lessons learned include:

- The most problematic user error in the parent financial section was the differentiation between Parent 1 and Parent 2's income in cases where parents filed jointly. Most people simply scanned the instructions in this section, which led to them adding lines 7+12+18 of the joint 1040 form. This meant that Parent 1 and Parent 2 were reported to be making individually as much as they make together. This question and its high propensity for errors were identical on the existing and the Streamlined FAFSA, and the usability report confirms that this question is confusing

on both forms, even with two different sets of instructions to help students answer it.

The purpose of asking dependent students with married, working parents to break down which parent earned what income is to give households with two earners more financial aid to compensate for the cost of working. Further, families with two moderate-income earners – for example, where each parent earns \$25,000 – would receive more financial aid than a family with married parents and only one earner of \$50,000. This generosity to working families is the reason the question was originally unaltered. However, the chance for error is high. At the very least, suggesting use of the W2 (or equivalent) rather than a tax return form may help more applicants answer this question correctly (Harper & Stoyneya, 2016b). Another possible way to access this same information, though in a blunter manner, would be to ask two-parent families if both parents worked enough to pay income tax – and if they did, whether they are full- or part-time workers. The most extreme option would be including the W2 as part of the IRS DRT, as some simplification proposals have suggested. However, logistical concerns, such as the ability to transfer the data in time – even with the new prior-prior year use – make this the most difficult solution to implement. But it could be possible if significant logistical barriers among the Social Security Administration, IRS, and Department of Education can be overcome.

- Other financial questions puzzled users as well. In general, it was clear that many families do not have the tax vocabulary needed to answer many of the questions, particularly on the current FAFSA form. Not knowing which type of 1040 they filed or how many exemptions they had – or what an exemption is – was also a recurring issue on both forms. A possible future solution is to provide instructions explaining each of the tax forms, ideally customized for each student and his or her required forms based on a trigger from the IRS DRT.
- Selective service registration is another question that confused students on both the current and Streamlined FAFSA, and could easily be removed from the form. The current FAFSA’s explanation of this question was unclear, and students frequently thought they were being asked to sign up for Active Duty in the military.
- For families who do not earn enough to pay income taxes, the assumption was that they would participate in at least one federal means-tested benefit program and automatically receive a full Pell Grant and Auto Zero EFC. However, through the testing and review, it became clear that there is a small portion of the population that neither earns enough to file federal income taxes nor participates in a means-tested benefit program. For the 2018-19 FAFSA cycle, families will be

able to verify their non-tax filing status via the IRS DRT (DiCarlo & Parkinson, 2016). With that confirmation, these students could also be given an automatic full Pell Grant and moved to the end of the form, but that is not modeled in the user testing or cost analysis provided here. Additionally, having electronic confirmation of non-tax filing status on the FAFSA would prevent the need for verification following FAFSA submission, a process currently required of all non-tax filers who complete the FAFSA for the 2017-18 academic year.

- Due to data restraints, the cost analysis could not determine who in the family received a means-tested benefit. For this reason, any dependent or independent FAFSA filer with a household member enrolled in one of the qualifying means-tested benefit programs was awarded a full Pell Grant. One consideration moving forward would be whether independent students in particular should qualify for a full Pell Grant because anyone in their family receives a means-tested benefit, as opposed to solely their spouse, or themselves.

## CONCLUSION

Applying for financial aid is a crucial part of student success in higher education. Eighty-five percent of four-year students receive some type of financial aid. Decreasing the barriers to that aid so students better understand their options for college – and particularly so students who think college is unaffordable will be encouraged to apply – is an achievable goal as demonstrated by the Streamlined FAFSA example. In particular, using federal means-tested benefits to provide a full Pell Grant and an EFC of \$0 provides messaging opportunities to low-income families that they are guaranteed aid. This simplification approach provides that it is possible to both improve FAFSA usability for students and their families and maintain the original intention of the form: to serve as a universal, free form to access student financial aid for higher education.

## APPENDIX

All charts are numbered to match the 2016-17 paper FAFSA form.

### A: Pathway One Chart

Questions to Keep		
1. Last name	21. Gender	61. Parent 1 Social Security Number
2. First name	22. <i>Selective service registration</i>	62. Parent 1 last name
3. Middle initial	24. Highest education completed by parent 1	63. Parent 1 first initial
4. Permanent street address	25. Highest education completed by parent 2	64. Parent 1 date of birth
5. City	26. High school completion status upon starting college	66. <i>Parent 2 last name</i>
6. State	27. High school, city, state	67. <i>Parent 2 first initial</i>
7. Zip code	28. First bachelor's degree status	65. <i>Parent 2 Social Security Number</i>
8. Social Security Number	29. Grade level at beginning of academic year	68. <i>Parent 2 date of birth</i>
9. Date of birth	30. Degree or certificate pursued	69. Parent email address
10. Telephone number	48. Master's or doctoral degree pursued	70. Parents' legal state of residence
13. Email address	49. Active duty military	72. Parent move date to state of legal residence
14. US citizenship status	50. Military veteran status	73/95. Number in household (with tool)
15. <i>Alien registration number</i>	51. Student with children	74/96. Number enrolled in college
16. Student marital status	52. Student with dependents	75-79/97-101. Federal means-tested benefits (w/ Medicaid)
17. <i>Student marriage date</i>	53-58. Foster/homeless status	103. College list and housing
18. Student state of legal residence	59. Parental marital status	105.1. Student signature
20. Student move date to state of legal residence	60. Parental marriage date	105.2 Parent signature

### Key

Auto-fill questions FSA ID = Teal

Manual-fill questions – All Pathways = Green

State-only questions = Grey

*Skip logic questions = Italics*

### Questions to Remove, Not on Paper FAFSA

Save Key

Have you ever received aid (Drug lead-in)

Are you in foster care (flag added to other question)

Parent file a K-1 schedule

Do parent assets exceed \$11,400

DRT lead-in questions, remove:

- Did student file a 1040X
- Did student file Puerto Rico or foreign taxes
- Did parent file a 1040X
- Did parent file a Puerto Rico or foreign taxes

Questions to Remove		
11. Driver's license state	45c. Student child support received	88. Parent 1 income earned from work
12. Driver's license number	45d. Student tax exempt interest income	89. Parent 2 income earned from work
19. Student legal residency of state date	45e. Student untaxed portions of IRA distributions	90. Parent balance of cash, savings, checking accounts
23. Convicted of drug possession while on financial aid	45f. Student untaxed portions of pensions	91. Parent net worth of investments, incl. real estate (not home)
31. Work-study consideration	45g. Student military/clergy living allowances	92. Parent net worth of current businesses and/or farms
32. Student taxes filed yes/no	45h. Student veterans noneducation benefits	93a. Parent AOTC/Lifetime Learning Credit
33. Student type of income tax return filed	45i. Student other untaxed income	93b. Parent child support paid
34. Student tax filing status	45j. Student money received/paid on your behalf	93c. Parent taxable earnings work study
35. If student filed 1040, A or EZ eligibility	46. Born before X date	93d. Parent college grant/scholarship reported to IRS
36. Student AGI	47. Marriage status as of today	93e. Parent combat pay
37. Student income tax	53. Parents deceased, foster care, ward of state	93f. Parent cooperative education program earnings
38. Student exemptions	54. Emancipated minor status	94a. Parent payments to tax deferred pensions/IRAs
39. Student income earned from work	55. Non-parental legal guardian status	94b. Parent IRA deductions
40. Student spouse income earned from work	56. Unaccompanied youth status	94c. Parent child support received
41. Student balance of cash, savings, checking accounts	57. Homeless or at risk of homelessness status (HUD)	94d. Parent tax exempt interest income
42. Student net worth of investments	58. Homeless or at risk of homelessness status (shelter)	94e. Parent untaxed portions of IRA distributions
43. Student net worth of businesses and/or farms	71. Parent legal residency of state date	94f. Parent untaxed portions of pensions
44a. Student AOTC/Lifetime Learning Credit	80. Parent taxes filed yes/no	94g. Parent military/clergy living allowances
44b. Student child support paid	81. Parent type of income tax return filed	94h. Parent veterans noneducation benefits
44c. Student taxable earnings from need-based employment like work-study	82. Parent tax filing status	94i. Parent other untaxed income
44d. Student college grant/scholarship reported to IRS	83. Parent filed 1040, A or EZ eligibility	104. Date form completed
44e. Student combat pay	84/102. Dislocated worker question	106. Preparer Social Security Number
44f. Student cooperative education program earnings	85. Parent AGI	107. Preparer employer ID number
45a. Student payments to tax deferred pensions/IRAs	86. Parent income tax	108. Preparer signature and date
45b. Student IRA deductions	87. Parent tax exemptions	

## B: Pathway Two Chart

Questions to Keep		
1. Last name	28. First bachelor's degree status	66. Parent 2 last name
2. First name	29. Grade level at beginning of academic year	67. Parent 2 first initial
3. Middle initial	30. Degree or certificate pursued	65. Parent 2 Social Security Number
4. Permanent street address	34. Student tax filing status	68. Parent 2 date of birth
5. City	39. Student income earned from work	69. Parent email address
6. State	45a. Student payments to tax deferred pensions/IRAs	70. Parents' legal state of residence
7. Zip code	36. Student AGI	72. Parent move date to state of legal residence
8. Social Security Number	37. Student income tax	73/95. Number in household (with tool)
9. Date of birth	38. Student exemptions	74/96. Number enrolled in college
10. Telephone number	44a. Student AOTC/Lifetime Learning Credit	75-79/97-101. Federal means-tested benefits (w/ Medicaid)
13. Email address	48. Master's or doctoral degree pursued	82. Parent tax filing status
14. US citizenship status	49. Active duty military	85. Parent AGI
15. Alien registration number	50. Military veteran status	86. Parent income tax
16. Student marital status	51. Student with children	87. Parent tax exemptions
17. Student marriage date	52. Student with dependents	88. Parent 1 income earned from work
18. Student state of legal residence	53-58. Foster/homeless status	89. Parent 2 income earned from work
20. Student move date to state of legal residence	59. Parental marital status	94a. Parent payments to tax deferred pensions/IRAs
21. Gender	60. Parental marriage date	94c. Parent child support received
22. Selective service registration	61. Parent 1 Social Security Number	93a. Parent AOTC/Lifetime Learning Credit
24. Highest education completed by parent 1	62. Parent 1 last name	103. College list and housing
25. Highest education completed by parent 2	63. Parent 1 first initial	105.1. Student signature
26. High school completion status upon starting college	64. Parent 1 date of birth	105.2 Parent signature
27. High school, city, state		

Key
Auto-fill questions FSA ID = Teal
Auto-fill questions IRS DRT = Light Blue
Manual-fill questions – All Pathways = Green
Manual-filled questions – Pathways 2 and 3 = Light Green
State-only questions = Grey
Skip logic questions = Italics

Questions to Remove		
11. Driver's license state	45e. Student untaxed portions of IRA distributions	90. Parent balance of cash, savings, checking accounts
12. Driver's license number	45f. Student untaxed portions of pensions	91. Parent net worth of investments, incl. real estate (not home)
19. Student legal residency of state date	45g. Student military/clergy living allowances	92. Parent net worth of current businesses and/or farms
23. Convicted of drug possession while on financial aid	45h. Student veterans noneducation benefits	93b. Parent child support paid
31. Work-study consideration	45i. Student other untaxed income	93c. Parent taxable earnings work study
32. Student taxes filed yes/no	45j. Student money received/paid on your behalf	93d. Parent college grant/scholarship reported to IRS
33. Student type of income tax return filed	46. Born before X date	93e. Parent combat pay
35. If student filed 1040, A or EZ eligibility	47. Marriage status as of today	93f. Parent cooperative education earnings program
40. Student spouse income earned from work	53. Parents deceased, foster care, ward of state	94b. Parent IRA deductions
41. Student balance of cash, savings, checking accounts	54. Emancipated minor status	94d. Parent tax exempt interest income
42. Student net worth of investments	55. Non-parental legal guardian status	94e. Parent untaxed portions of IRA distributions
43. Student net worth of businesses and/or farms	56. Unaccompanied youth status	94f. Parent untaxed portions of pensions
44b. Student child support paid	57. Homeless or at risk of homelessness status (HUD)	94g. Parent military/clergy living allowances
44c. Student taxable earnings from need-based employment like work study	58. Homeless or at risk of homelessness status (shelter)	94h. Parent veterans noneducation benefits
44d. Student college grant/scholarship reported to IRS	71. Parent legal residency of state date	94i. Parent other untaxed income
44e. Student combat pay	80. Parent taxes filed yes/no	104. Date form completed
44f. Student cooperative education program earnings	81. Parent type of income tax return filed	106. Preparer Social Security Number
45b. Student IRA deductions	83. Parent filed 1040, A or EZ eligibility	107. Preparer employer ID number
45c. Student child support received	84/102. Dislocated worker	108. Preparer signature and date
45d. Student tax exempt interest income		

### Questions to remove, not on paper FAFSA

Save Key	DRT lead-in questions, remove: <ul style="list-style-type: none"> <li>• Did student file a 1040X</li> <li>• Did student file Puerto Rico or foreign taxes</li> <li>• Did parent file a 1040X</li> <li>• Did parent file Puerto Rico or foreign taxes</li> </ul>
Have you ever received aid (Drug lead-in)	
Are you in foster care (flag added to other question)	
Parent file a K-1 schedule	
Do parent assets exceed \$11,400	

## C: Federal Methodology Chart

Questions Required for Federal Methodology for Aid Eligibility	
Questions to Keep	
14. US citizenship status	
16. Student marital status	
17. Student marriage date	
18. Student state of legal residence	
26. High school completion status upon starting college	
28. First bachelor's degree status	
29. Grade level at beginning of academic year	
30. Degree or certificate pursued	
48. Master's or doctoral degree pursued	
49. Active duty military	
50. Military veteran status	
51. Student with children	
52. Student with dependents	
53-58. Foster/homeless status	
59. Parental marital status	
60. Parental marriage date	
70. Parent legal state of residence	
73/95. Number in household (with tool)	
74/96. Number enrolled in college	
75-79/97-101. Federal means-tested benefits (with Medicaid)	

Questions Required for Federal Methodology for Aid Eligibility	
Questions to Remove	
32. Student taxes filed yes/no	55. Non-parental legal guardian status
33. Student type of income tax return filed	56. Unaccompanied youth status
34. Student tax filing status	57. Homeless or at risk of homelessness status (HUD)
35. If student filed 1040, A or EZ eligibility	58. Homeless or at risk of homelessness status (shelter)
36. Student AGI	80. Parent taxes filed yes/no
37. Student income tax	81. Parent type of income tax return filed
38. Student exemptions	82. Parent tax filing status
39. Student income earned from work	83. Parent filed 1040, A or EZ eligibility
40. Student spouse income earned from work	84/102. Dislocated worker
41. Student balance of cash, savings, checking accounts	85. Parent AGI
42. Student net worth of investments	86. Parent income tax
43. Student net worth of businesses and/or farms	87. Parent tax exemptions

44a. Student AOTC/Lifetime Learning Credit	88. Parent 1 income earned from work
44b. Student child support paid	89. Parent 2 income earned from work
44c. Student taxable earnings from need-based employment like work-study	90. Parent balance of cash, savings, checking accounts
44d. Student college grant/scholarship reported to IRS	91. Parent net worth of investments, incl. real estate (not home)
44e. Student combat pay	92. Parent net worth of current businesses and/or farms
44f. Student cooperative education program earnings	93a. Parent AOTC/Lifetime Learning Credit
45a. Student payments to tax deferred pensions/IRAs	93b. Parent child support paid
45b. Student IRA deductions	93c. Parent taxable earnings work study
45c. Student child support received	93d. Parent college grant/scholarship reported to IRS
45d. Student tax exempt interest income	93e. Parent combat pay
45e. Student untaxed portions of IRA distributions	93f. Parent cooperative education program earnings
45f. Student untaxed portions of pensions	94a. Parent payments to tax deferred pensions/IRAs
45g. Student military/clergy living allowances	94b. Parent IRA deductions
45h. Student veterans noneducation benefits	94c. Parent child support received
45i. Student other untaxed income	94d. Parent tax exempt interest income
45j. Student money received/paid on your behalf	94e. Parent untaxed portions of IRA distributions
46. Born before X date	94f. Parent untaxed portions of pensions
47. Marriage status as of today	94g. Parent military/clergy living allowances
53. Parents deceased, foster care, ward of state	94h. Parent veterans noneducation benefits
54. Emancipated minor status	94i. Parent other untaxed income

### *D: Pathway Three Chart*

Questions to Keep		
1. Last name	28. First bachelor's degree status	67. Parent 2 first initial
2. First name	29. Grade level at beginning of academic year	65. Parent 2 Social Security Number
3. Middle initial	30. Degree or certificate pursued	68. Parent 2 date of birth
4. Permanent street address	34. Student tax filing status	69. Parent email address
5. City	39. Student income earned from work	70. Parent legal state of residence
6. State	45a. Student payments to tax deferred pensions/IRAs	72. Parent move date to state of legal residence
7. Zip code	36. Student AGI	73/95. Number in household (with tool)
8. Social Security Number	37. Student income tax	74/96. Number enrolled in college
9. Date of birth	38. Student exemptions	75-79/97-101. Federal means-tested benefits (w/ Medicaid)

10. Telephone number	<i>44a. Student AOTC/Lifetime Learning Credit</i>	82. Parent tax filing status
13. Email address	48. Master's or doctoral degree pursued	85. Parent AGI
14. US citizenship status	49. Active duty military	86. Parent income tax
<i>15. Alien registration number</i>	50. Military veteran status	87. Parent tax exemptions
16. Student marital status	51. Student with children	88. Parent 1 income earned from work
<i>17. Student marriage date</i>	52. Student with dependents	<i>89. Parent 2 income earned from work</i>
18. Student state of legal residence	53-58. Foster/homeless status	90. Parent balance of cash, savings, checking accounts
20. Student move date to state of legal residence	59. Parental marital status	91-92. Parent net worth of investments, incl. real estate, businesses and/or farms
21. Gender	60. Parental marriage date	94a. Parent payments to tax deferred pensions/IRAs
<i>22. Selective service registration</i>	61. Parent 1 Social Security Number	94c. Parent child support received
24. Highest education completed by parent 1	62. Parent 1 last name	93a. Parent AOTC/Lifetime Learning Credit
25. Highest education completed by parent 2	63. Parent 1 first initial	103. College list and housing
26. High school completion status upon starting college	64. Parent 1 date of birth	105.1. Student signature
27. High school, city, state	<i>66. Parent 2 last name</i>	105.2 Parent signature

## Key

Auto-fill questions FSA ID = Teal

Auto-fill questions IRS DRT = Light Blue

Manual-fill questions – All Pathways = Green

Manual-filled questions – Pathways 2 and 3 = Light Green

Manual-filled questions – Pathways 3 only = Dark Green

State-only questions = Grey

*Skip logic questions = Italics*

## Questions to Remove

11. Driver's license state	53. Parents deceased, foster care, ward of state
12. Driver's license number	54. Emancipated minor status
19. Student legal residency of state date	55. Non-parental legal guardian status
23. Convicted of drug possession while on financial aid	56. Unaccompanied youth status
31. Work-study consideration	57. Homeless or at risk of homelessness status (HUD)
32. Student taxes filed yes/no	58. Homeless or at risk of homelessness status (shelter)
33. Student type of income tax return filed	71. Parent legal residency of state date
35. If student filed 1040, A or EZ eligibility	80. Parent taxes filed yes/no
40. Student spouse income earned from work	81. Parent type of income tax return filed
41. Student balance of cash, savings, checking accounts	83. Parent filed 1040, A or EZ eligibility

42. Student net worth of investments	84/102. Dislocated worker
43. Student net worth of businesses and/or farms	93b. Parent child support paid
44b. Student child support paid	93c. Parent taxable earnings work study
44c. Student taxable earnings from need-based employment like work study	93d. Parent college grant/scholarship reported to IRS
44d. Student college grant/scholarship reported to IRS	93e. Parent combat pay
44e. Student combat pay	93f. Parent cooperative education earnings program
44f. Student cooperative education program earnings	94b. Parent IRA deductions
45b. Student IRA deductions	94d. Parent tax exempt interest income
45c. Student child support received	94e. Parent untaxed portions of IRA distributions
45d. Student tax exempt interest income	94f. Parent untaxed portions of pensions
45e. Student untaxed portions of IRA distributions	94g. Parent military/clergy living allowances
45f. Student untaxed portions of pensions	94h. Parent veterans noneducation benefits
45g. Student military/clergy living allowances	94i. Parent other untaxed income
45h. Student veterans non education benefits	104. Date form completed
45i. Student other untaxed income	106. Preparer Social Security Number
45j. Student money received/paid on your behalf	107. Preparer employer ID number
46. Born before X date	108. Preparer signature and date
47. Marriage status as of today	

### Questions to remove, not on paper FAFSA

Save Key	DRT lead-in questions, remove: <ul style="list-style-type: none"> <li>• Did student file a 1040X</li> <li>• Did student file Puerto Rico or foreign taxes</li> <li>• Did parent file a 1040X</li> <li>• Did parent file Puerto Rico or foreign taxes</li> </ul>
Have you ever received aid (Drug lead-in)	
Are you in foster care (flag added to other question)	
Parent file a K-1 schedule	
Do parent assets exceed \$11,400	

## *E: FAFSA Completion Times Chart*

<b>Free Application for Federal Student Aid (FAFSA) By Various Demographic Characteristics 2014/15 Application Cycle</b>	
<b>Application Completion Times</b>	<b>(Minutes:Seconds)</b>
All Applicants	19:43
Dependent, Original, and Full Form	32:50
Dependent, Original, and EZ Form	29:48
Dependent, Renewal, and Full Form	23:02
Dependent, Renewal, and EZ Form	18:44
Independent, Original, and Full Form	16:24
Independent, Original, and EZ Form	14:41
Independent, Renewal, and Full Form	11:48
Independent, Renewal, and EZ Form	8:56

SOURCE: Federal Student Aid FAFSA Volume Reports: FAFSA Data by Demographic Characteristics, 2014-15 Application Cycle

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