GAO

FAFSA

Education Needs to Improve Communications and Support around the Free Application for Federal Student Aid

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Testimony

Before the Subcommittee on Higher Education and Workforce Development, Committee on Education and the Workforce, House of Representatives

Accessible Version

GAO Highlights

September 2024

FAFSA

Education Needs to Improve Communications and Support around the Free Application for Federal Student Aid

Why GAO Did This Study

The FAFSA is the entry ramp to federal grants and loans that many students depend on to afford college. Congress passed the FAFSA Simplification Act in 2020 in part to make it easier to apply for federal aid. However, Education's rollout of the new FAFSA has suffered from numerous challenges and delays.

GAO was asked to review the simplified FAFSA rollout. This statement assesses (1) how Education's rollout of the new FAFSA affected students, (2) the extent to which Education provided students with information and support, and (3) the extent to which Education provided colleges with timely communications. This statement is a companion to GAO's related statement on FAFSA system issues (GAO-24-107783).

To conduct this work, GAO analyzed Education data on FAFSA submissions and processing for the current application cycle (2024-25) and comparable data for the prior year. GAO also examined data and performance metrics from Education's call center for the same periods, interviewed Education officials and other key stakeholders from higher education associations and reviewed relevant federal laws and guidance.

What GAO Recommends

GAO is making seven recommendations to Education to ensure it is prepared for the start of the next FAFSA cycle by December 2024. These recommendations include that Education overhaul the submission process for parents and spouses without Social Security numbers, ensure sufficient call center staffing, and communicate timely information to students and timeframes to colleges.

What GAO Found

The Department of Education's rollout of the new simplified Free Application for Federal Student Aid (FAFSA) was delayed by 3 months from the traditional October launch and hampered by a series of technical problems that blocked some students from completing the application. This contributed to about 9 percent fewer high school seniors and other first-time applicants submitting a FAFSA, with the largest declines among lower-income students, according to Education data as of August 25, 2024. The new process also created additional barriers, including an inefficient process for students' parents or spouses who lacked a Social Security number to verify their identities. This process prevented some families from even accessing the application. Rather than simplifying access to student financial aid—one of the department's strategic goals—the FAFSA rollout created roadblocks for some students and their families.

Decline in FAFSA Submissions, Current Compared to Prior Application Cycle

	High school seniors and other first-time applicants		Returning applicants		Total applicants
Current application cycle	3,177,000	**+**	11,161,000	**=**	14,338,000
Change from prior year	⬇ 325,000 -9%		⬇ 106,000 -1%		⬇ 432,000 -3%

Source: GAO analysis of Department of Education data. | GAO-24-107407

Accessible Data for Decline in FAFSA Submissions, Current Compared to Prior Application Cycle

	High school seniors and other first-time applicants	Returning applicants	Total Applicants
Current application cycle	3,177,000	11,161,000	14,338,000
Change from prior year	-325,000 -9%	-106,000 -1%	-432,000 -3%

Source: GAO analysis of Department of Education data. | GAO-24-107407

Note: Data are through August 25th of each cycle.

Education did not consistently provide students with timely and sufficient information or support necessary to complete the new FAFSA. Nearly three-quarters of calls to Education's call center went unanswered during the first 5 months of the rollout due to understaffing. Education also did not provide timely information to students about processing delays or how they could navigate technical problems. For example, Education's guidance instructed call center representatives to advise some students facing technical problems to just "try again later" rather than proactively notifying them when the problem was resolved, which sometimes took months. Education's lack of timely support and clear communications stoked confusion among FAFSA applicants.

Total Calls to Education's Call Center, First 5 Months of FAFSA Application Cycle, January-May 2024

Total calls 5.4 million	Total calls unanswered 4.0 million (74%)	Total calls answered 1.4 million (26%)

Source: GAO analysis of Department of Education data. | GAO-24-107407

Accessible Data for Total Calls to Education's Call Center, First 5 Months of FAFSA Application Cycle, January-May 2024

Total calls data
- Total calls (5.4 million)
- Total calls unanswered (4.0 million (74%))
- Total calls answered (1.4 million (26%))

Source: GAO analysis of Department of Education data. | GAO-24-107407

Education did not provide colleges with reliable timeframes or communicate changes to colleges in a timely manner. For example, Education did not give colleges any advanced warning that it would not meet promised deadlines for delivering the student records colleges needed to develop aid offers. As a result, colleges were uncertain when they could send aid offers to students as well as when they could disburse student funds. With the next FAFSA application cycle beginning by December 2024, Education still has an opportunity to learn from its recent struggles and make the financial aid process easier for everyone.

Chairman Owens, Ranking Member Wilson, and Members of the Subcommittee:

Thank you for the opportunity to be here today to discuss the Department of Education's troubled rollout of the newly simplified Free Application for Federal Student Aid (FAFSA). Each year, students rely on the FAFSA to determine their eligibility for federal grants, loans, and work-study. In this way the FAFSA provides a critical entry ramp for students into higher education by connecting them with the federal aid they may need to afford college. Congress passed the FAFSA Simplification Act in 2020 to make it easier for students to apply for federal aid, and the subsequent changes reduced the number of questions from more than 100 to as few as 18 for some applicants.[1] However, the numerous delays and challenges during Education's rollout of the simplified application this year instead turned the FAFSA into a series of roadblocks that many students and colleges have struggled to navigate. Given these concerns, we were asked to review Education's FAFSA rollout.[2]

Although Education has taken steps to rectify many of the initial challenges, students and colleges are still feeling the negative effects of the rollout. Additionally, there have been concerns among student advocacy groups and colleges that some of these issues might spill over into the next FAFSA cycle, and Education has already pushed the release date for the next cycle back by up to 2 months, to December 1, 2024 at the latest.[3] In addition to this statement, we are also issuing a companion statement today on our other work examining the underlying technical issues and delays affecting the FAFSA Processing System.[4]

My statement today will address (1) how Education's rollout of the new FAFSA affected students; (2) the extent to which Education provided students with information and support to navigate the new FAFSA application process; and (3) the extent to which Education provided colleges with timely communications during the rollout of the new FAFSA.

I will also highlight seven recommendations for improving the FAFSA process for the upcoming FAFSA cycle and in future years.

To examine these issues, we analyzed Education data on FAFSA submissions and processing for the current application cycle (corresponding with the 2024-25 award year) along with comparable data for the prior cycle (corresponding with the 2023-24 award year), when available. We also examined data and performance metrics from Education's call center for the current and previous FAFSA cycles to determine the extent to which students and parents were able to access support. We assessed the reliability of these data by

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[1]Pub. L. No. 116-260, div. FF, tit. VII, 134 Stat. 1182, 3137-201.

[2]See app. I for a list of the original requesters for this study.

[3]Each FAFSA cycle is named for the academic year for which students are applying for aid. Education is currently accepting applications for the 2024-25 award cycle (i.e., students are applying for aid to attend college during the 2024-2025 school year). We refer to FAFSA applications for the 2024-25 award cycle as the "current cycle," 2023-24 as the "prior cycle," and 2025-26 as the "next cycle."

[4]See GAO, *Department of Education: Preliminary Results Show Strong Leadership Needed to Address Serious Student Aid System Weaknesses,* GAO-24-107783 (Washington, D.C.: September 24, 2024).

reviewing documentation about the relevant data systems and interviewing Education officials responsible for these systems, and we found the data to be sufficiently reliable for the purposes of our reporting objectives.

In addition, we reviewed relevant federal laws. We also collected documents and internal guidance from Education on the technical issues encountered during the FAFSA rollout, the department's outreach to and communications with students and colleges, and policies and procedures for processing FAFSA applications.

We interviewed Education officials, and stakeholders from selected associations representing college administrators, high school counselors, state higher education offices, and college access organizations (which focus on promoting enrollment in higher education). We selected these associations and organizations to capture key groups that participate in or depend on the FAFSA process. We assessed Education's efforts against the department's own performance goals in its strategic plan and its equity action plan and federal standards for internal controls related to quality information and communication.[5]

We provided a draft of this statement to Education in advance of the hearing to receive technical comments and information. We incorporated their comments, as appropriate. Consistent with GAO testimony protocols, we did not request or receive formal comments from the department.

We conducted our work for this testimony in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Student Aid and the FAFSA Simplification Act

Education's Office of Federal Student Aid administers numerous federal student aid programs, including federal grants and loans. Students apply for this aid by completing the FAFSA, which is typically done online, but students also have the option to submit a paper form. In light of longstanding concerns about the length and complexity of the application, Congress passed the FAFSA Simplification Act in December 2020.[6] The Act represented a significant overhaul of the processes and methodology used to calculate and award federal student aid. The simplified FAFSA included changes to streamline the application process by reducing the number of questions and, when possible, pull students' and parents' financial information directly from the Internal Revenue Service (IRS).[7]

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[5]U.S. Department of Education, Office of Federal Student Aid, *Federal Student Aid: Strategic Plan, Fiscal Year 2023–2027; Equity Action Plan Update* (2023); and GAO, Standards for Internal Control in the Federal Government, GAO-14-704G (Washington, D.C.: Sept. 2014).

[6]Pub. L. No. 116-260, div. FF, tit. VII, 134 Stat. 1182, 3137-201.

[7]This data exchange was made possible by the Fostering Undergraduate Talent by Unlocking Resources for Education Act (FUTURE Act). Education implemented portions of the FUTURE Act alongside the FAFSA Simplification Act when modifying the FAFSA form and process. Pub. L. No. 116-91, 133 Stat. 1189 (2019).

The FAFSA Simplification Act also expanded eligibility for certain types of student aid, including Pell Grants, which support low-income undergraduate students. The Act also aims to enhance program integrity by improving controls around identity verification and data accuracy.

The FAFSA Simplification Act originally had a general effective date of July 1, 2023, but at the request of Education, Congress passed an extension, pushing back the effective date one year to coincide with the start of the current cycle, which typically would have started in October 2024.[8]

Delays and Technical Challenges Affecting the Simplified FAFSA Rollout

The rollout of the simplified FAFSA for the current cycle faced numerous delays and technical issues from the very beginning. Although the FAFSA is typically released and available each year for students to start applying on October 1st, Education did not release the current form until December 30, 2023. During this "soft launch," students were only able to access the form for less than an hour during each of the first 2 days, and the application was not consistently online until January 7, 2024, according to Education. This initial delay was followed by multiple others that pushed back timelines for processing students' applications, providing colleges the information they needed to develop students' financial aid offers, and allowing students and colleges to make corrections, such as addressing errors (e.g., a missing signature) in the initial submission (see fig. 1).

Figure 1: Delays in the Rollout of the Free Application for Federal Student Aid (FAFSA) Compared to Prior Years
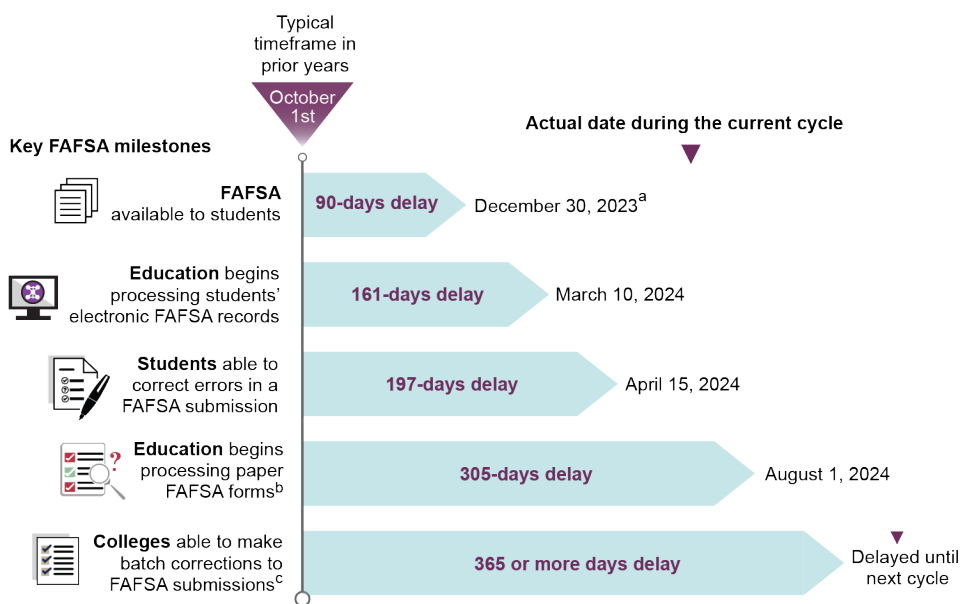
Source: GAO analysis of Department of Education documents; GAO (icons). | GAO-24-107407

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[8]FAFSA Simplification Act Technical Corrections Act. Pub. L. No. 117-103, div. R, tit. VII, 134 Stat. 49, 819-21 (2022).

Accessible Data for Figure 1: Delays in the Rollout of the Free Application for Federal Student Aid (FAFSA) Compared to Prior Years

Key FAFSA milestones	Typical timeframe in prior years (October 1st)	Actual date during the current cycle
FAFSA available to students	98-days delay	January 7, 2024[a]
Education begins processing students' electronic FAFSA records	150-days delay	March 11, 2024
Students able to correct errors in a FAFSA submission	200-days delay	April 15, 2024
Education begins processing paper FAFSA forms[b]	300-days delay	August 1, 2024
Colleges able to make batch corrections to FAFSA submissions[c]	365 or more days delay	Delayed until next cycle

Source: GAO analysis of Department of Education documents; GAO (icons). | GAO-24-107407

[a]The Department of Education had a "soft launch" of the FAFSA on December 30, 2023, but the application was not consistently available until January 7, 2024, according to Education.
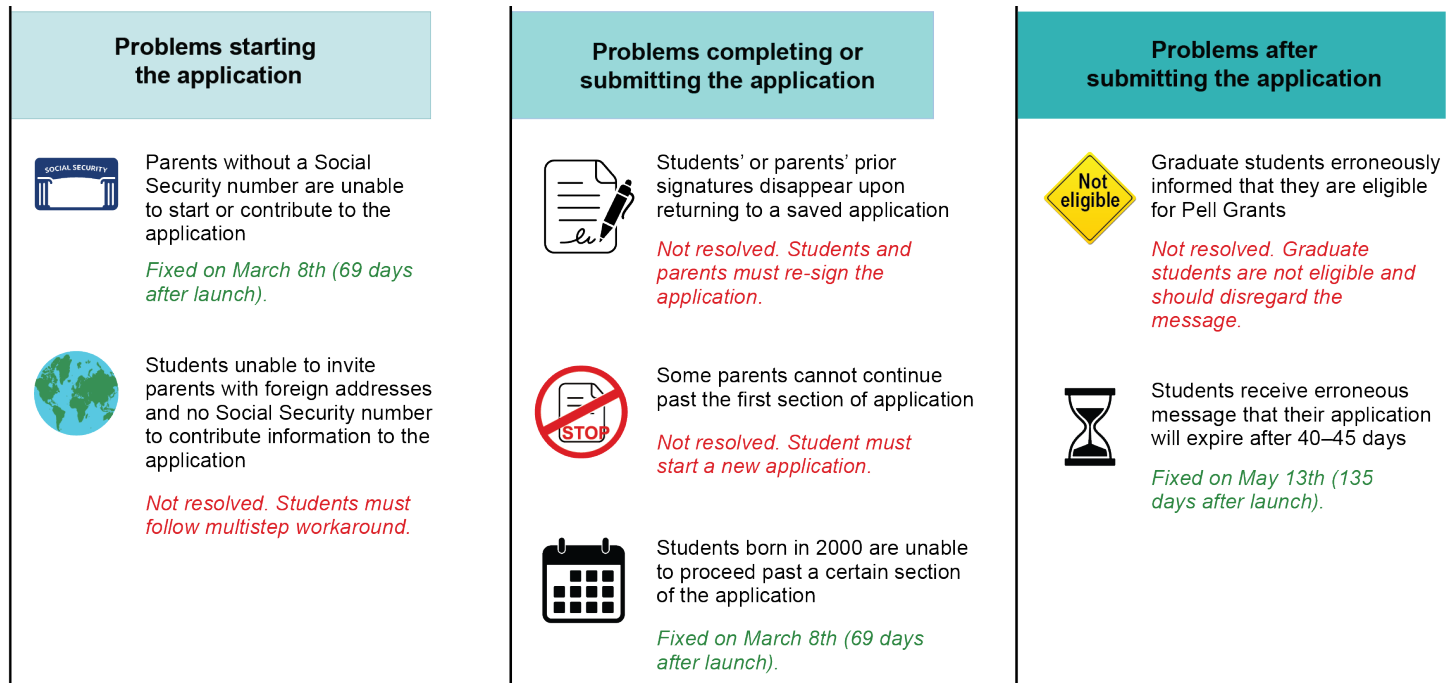
[b]Students have the option to submit a paper FAFSA form by mail instead of the online FAFSA form.

[c]The batch corrections function allows colleges to make and upload multiple corrections to Education at one time. Colleges could submit individual corrections through a manual process beginning June 30, 2024.

Technical problems have also impeded students' ability to complete the FAFSA. Education has identified over 40 separate technical issues with the initial rollout of the FAFSA form.[9] These issues included problems that blocked some students from completing the application—or in some cases prevented them from starting it. Other issues include deleting information applicants entered into the form, providing erroneous error messages, and providing incorrect estimates of students' eligibility for federal aid (see fig. 2).

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[9]This count of technical issues is based on Education's 2024-25 FAFSA Issue Alerts, as of August 2024 (see: https://fsapartners.ed.gov/knowledge-center/topics/fafsa-simplification-information/2024-25-fafsa-issue-alerts).

Figure 2: Examples of Technical Issues Affecting the Rollout of the Free Application for Federal Student Aid (FAFSA)

Problems starting the application	Problems completing or submitting the application	Problems after submitting the application
Parents without a Social Security number are unable to start or contribute to the application

Fixed on March 8th (69 days after launch). | Students' or parents' prior signatures disappear upon returning to a saved application

Not resolved. Students and parents must re-sign the application. | Graduate students erroneously informed that they are eligible for Pell Grants

Not resolved. Graduate students are not eligible and should disregard the message. |
| Students unable to invite parents with foreign addresses and no Social Security number to contribute information to the application

Not resolved. Students must follow multistep workaround. | Some parents cannot continue past the first section of application

Not resolved. Student must start a new application. | Students receive erroneous message that their application will expire after 40–45 days

Fixed on May 13th (135 days after launch). |
| | Students born in 2000 are unable to proceed past a certain section of the application

Fixed on March 8th (69 days after launch). | |

Source: GAO analysis of Department of Education documents; Adobe Stock (icons). | GAO-24-107407

Accessible Data for Figure 2: Examples of Technical Issues Affecting the Rollout of the Free Application for Federal Student Aid (FAFSA)

Problems starting the application	Problems completing or submitting the application	Problems after submitting the application
Parents without a Social Security number are unable to start or contribute to the application

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Not resolved. Students must follow multistep workaround. | Some parents cannot continue past the first section of application

Not resolved. Student must start a new application. | Students receive erroneous message that their application will expire after 40-45 days

Fixed on May 13th (135 days after launch). |
| | Students born in 2000 are unable to proceed past a certain section of the application

Fixed on March 8th (69 days after launch). | |

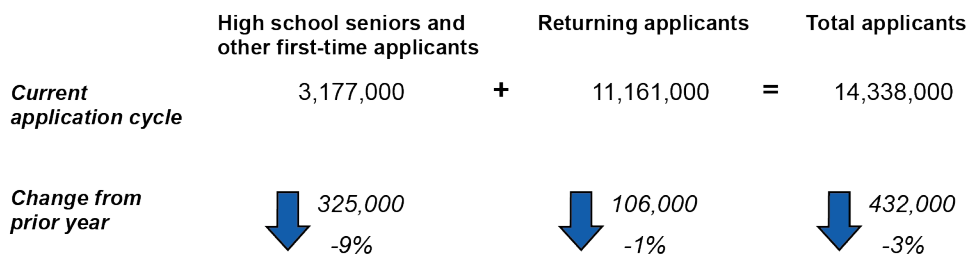Source: GAO analysis of Department of Education documents; Adobe Stock (icons). | GAO-24-107407

Note: The status of unresolved technical issues is current as of September 5, 2024.

Education's Troubled FAFSA Rollout Resulted in Barriers to Students Applying for Aid

FAFSA Delays and Barriers Contributed to Fewer Students Applying for Aid

Approximately 9 percent fewer high school seniors and other first-time applicants had submitted a FAFSA by August 25, 2024, compared to the same period last year.[10] When including all FAFSA applicants (e.g., both prior year applicants and first timers), about 432,000 fewer individuals had submitted a FAFSA compared to last year, a 3 percent decrease (see fig. 3) as of August 25, 2024.[11]

Figure 3: Decline in Free Application for Federal Student Aid (FAFSA) Submissions, Current Application Cycle Compared to Prior Year

	High school seniors and other first-time applicants		Returning applicants		Total applicants
Current application cycle	3,177,000	**+**	11,161,000	**=**	14,338,000
Change from prior year	↓ 325,000 -9%		↓ 106,000 -1%		↓ 432,000 -3%

Source: GAO analysis of Department of Education data. | GAO-24-107407

Accessible Data for Figure 3: Decline in Free Application for Federal Student Aid (FAFSA) Submissions, Current Application Cycle Compared to Prior Year

	High school seniors and other first-time applicants	Returning applicants	Total Applicants
Current application cycle	3,177,000	11,161,000	14,338,000
Change from prior year	-325,000 -9%	-106,000 -1%	-432,000 -3%

Source: GAO analysis of Department of Education data. | GAO-24-107407

Notes: Data are through August 25 of each cycle. The current application cycle refers to applications for the 2024-25 award year and the prior cycle refers to the 2023-24 award year. According to Education, first-time applicants are identified as individuals who do not have a processed FAFSA from a previous cycle. Education identified high school seniors using several criteria, including those who are no older than 19 years of age and entering college as a freshman with a high school diploma.

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[10]According to Education, first-time applicants are identified as individuals who do not have a processed FAFSA from a previous cycle prior to submitting a FAFSA for the current cycle. Education identified high school seniors using several criteria, including those who are no older than 19 years of age and entering college as a freshman with a high school diploma.

[11]Education has previously projected that overall college enrollment would increase slightly in fall 2024 compared to the prior year, which makes the decline in FAFSA submissions even more notable because more, not fewer, students should be planning to enroll in college this fall. In addition, as in previous FAFSA cycles, some submitted applications are rejected by Education because of errors or missing signatures. The number of rejected applications this cycle (1.7 million as of August 26, 2024) was 30 percent higher than last year. However, the majority of these rejected applications were subsequently corrected by students. There are currently around 406,000 rejected applications that are still awaiting student corrections, which is lower than the number from last year at this time (460,000).

These declines in FAFSA submissions have been most pronounced among lower income students and families. Among independent applicants, the percent decline in submissions was largest for those with incomes of $30,000 or less, according to our analysis of Education data as of August 26, 2024.[12] For dependent applicants, the drop in submissions was largest for families with incomes of $30,001 to $48,000 (see fig. 4).

Figure 4: Percentage Change in Free Application for Federal Student Aid (FAFSA) Submissions by Income Level, Current Application Cycle Compared to Prior Cycle

Student/family income level	Independent applicants	Dependent applicants
$0-$30,000	↓ 6%	↓ 7%
$30,001-$48,000	↓ 2%	↓ 11%
$48,001-$75,000	↑ 3%	↓ 8%
$75,001-$110,000	↑ 7%	↓ 6%
$110,001+	↑ 21%	↑ 4%

Source: GAO analysis of Department of Education data. | GAO-24-107407

Accessible Data for Figure 4: Percentage Change in Free Application for Federal Student Aid (FAFSA) Submissions by Income Level, Current Application Cycle Compared to Prior Cycle

Student/family income level	Independent Applicants	Dependent Applicants
$0-$30,000	-6%	-7%
$30,001-$48,000	-2%	-11%
$48,001-$75,000	3%	-8%
$75,001-$110,000	7%	-6%
$110,001+	21%	4%

Source: GAO analysis of Department of Education data. | GAO-24-107407

Notes: Data are through August 26 of each cycle. The current application cycle refers to applications for the 2024-25 award year and the prior cycle refers to the 2023-24 award year. An independent student is one of the following: at least 24 years old, married, a graduate or professional student, a veteran, a member of the armed forces, an orphan, a ward of the court, or someone with legal dependents other than a spouse, an emancipated minor or someone who is homeless or at risk of becoming homeless.

Stakeholders we interviewed representing high school counselors and college access groups attributed the reduced submissions to Education's delays and technical challenges that accompanied the FAFSA rollout.

- **Delayed start to complete the FAFSA:** Students generally had about 100 fewer days to complete the FAFSA this year. This shortened timeline hampered the outreach efforts of states, high schools, and other organizations that seek to connect with students, build enthusiasm about pursuing higher education, and assist them in completing the FAFSA. For example, many high school counselors are already overburdened with caseloads and other responsibilities in a typical school year, so the FAFSA delays prevented them from having enough time to help all of the students in need, according to representatives of high school counselors and college access groups.[13]

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[12]An independent student is one of the following: at least 24 years old, married, a graduate or professional student, a veteran, a member of the armed forces, an orphan, a ward of the court, or someone with legal dependents other than a spouse, an emancipated minor or someone who is homeless or at risk of becoming homeless.

[13]According to officials from one organization representing high school counselors, many counselors have additional school positions. Their schedules are therefore hectic, and at times inflexible, according to these officials.

- **Technical barriers:** Numerous technical issues with the FAFSA potentially derailed some students, leading them to give up on the process. As of August 26, 2024, approximately 1.6 million students had started but not completed a FAFSA application, according to Education data.[14] Some high school counselor and college access groups told us that lower-income and first-generation students were particularly vulnerable to being knocked off course by the rollout's technical issues.

The reduced number of FAFSA submissions is notable because lower-income students who do not complete a FAFSA enroll in college at lower rates. If these students ultimately forgo college, they could in turn face fewer employment opportunities and lower earnings.[15] In addition, students who enroll in college without submitting a FAFSA will miss out on federal grants. There are many students every year who would be eligible for Pell Grants but do not submit a FAFSA, according to Education.

Education has undertaken multiple initiatives since January 2024 to close this FAFSA submission gap. These efforts have included outreach to students, such as email and text message campaigns, social media outreach, and webinars. Education has also partnered with states, school districts, nonprofits, and other public and private organizations as part of its broader FAFSA Student Support Strategy backed by up to $50 million in award funding. Education officials said the FAFSA Student Support Strategy is aimed at increasing the number of students who complete a FAFSA this cycle and enroll in college, particularly first-time college students, first-generation students, and other underrepresented students.[16] The combined efforts of Education and its stakeholders likely contributed to the closing of the FAFSA submission gap from about 1.4 million fewer applicants in mid-May 2024 to around 430,000 fewer applicants in late August 2024 compared to last year. As in previous years, students will continue to submit FAFSAs throughout the remainder of the current cycle, and there is a chance that the submissions gap could continue to shrink.[17]

But challenges remain, and representatives for high school counselors and college access groups said it is particularly challenging to close the remaining gap once high school seniors have graduated and are no longer connected to resources from their high school and the counselors who support them. Therefore, it is likely that FAFSA submissions will remain lower this cycle compared to last year.

Students who did not complete a FAFSA this cycle could continue to miss out on financial aid they need to pursue college unless Education, in partnership with other stakeholders, reengages with them and encourages them to complete the form. Reconnecting with these students during the next FAFSA cycle would also align with the key goal in Education's Office of Federal Student Aid strategic plan of advancing equity and access to student financial aid.[18] For example, this could involve a continuation of targeted emails to the 1.6 million

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[14]Comparable data is not available for prior years. In prior years, the department removed inactive applications from the system after 45 days, according to Education officials. Due to the complications with the 2024-25 FAFSA rollout, Education did not remove applications due to inactivity this cycle to give applicants additional time to submit the form, according to officials.

[15]According to the Bureau of Labor Statistics, certain occupations typically require a bachelor's degree or higher and workers' earnings generally increase as educational attainment rises.

[16]According to Education, the FAFSA Student Support Strategy involves over 300 entities that as of July 2024 reported using funds to train and deploy over 3,000 staff to assist students, conducted over 6,500 events (clinics, webinar, trainings), engaged 415,000 students or families via outreach activities, and reached 89 million people via social media.

[17]Students have until June 30, 2025, to submit FAFSA applications for the 2024-2025 award cycle, but the vast majority of students generally apply before the start of the school year.

[18]U.S. Department of Education, Office of Federal Student Aid, *Federal Student Aid: Strategic Plan, Fiscal Year 2023–2027.*

students who started but did not complete an application this cycle. Similarly, Education could work with stakeholders and local partners on an outreach plan to leverage local community touchpoints to reengage with recent high school graduates who did not submit a FAFSA during the initial troubled rollout. However, Education officials said they are still developing their broader communication plan for the upcoming cycle and do not currently have a strategy for continued outreach to these students once the new FAFSA cycle fully begins by December 2024. Until Education develops such a strategy, it will not be able to effectively reconnect with these students who encountered roadblocks trying to access student financial aid and were potentially knocked off their path toward higher education.

Another Consequence of Free Application for Federal Student Aid (FAFSA) Delays⸻Belated Financial Aid Offers:

Another effect of Education's FAFSA delays was that some students had to make decisions about where to attend college before they had received financial aid offers. May 1st is traditionally the deadline for admitted students to commit to enrolling in the college of their choice. However, in this cycle, Education did not begin sending schools the FAFSA student records they needed to calculate students' financial aid until mid-March, several months behind schedule. This left colleges little time to develop students' financial aid offers. Some colleges ultimately pushed back their decision dates, but others did not. A high school counselor told us that some students had to commit to a college before they even received an aid offer.

Students and families typically rely on these offers to understand how much colleges cost and the types and amounts of financial aid for which they are eligible. For example, the amount of scholarship aid an institution offers can vary widely based on a student's unique situation and is hard to predict. In the absence of an aid offer, it was difficult for students to determine which colleges were more affordable. Education's delays therefore left some students to make key education and financial decisions without sufficient information, including whether to pursue higher education, which college to attend, and how to finance their education. This was particularly problematic for lower- and middle-income students who relied on financial aid to afford college, according to organizations we interviewed. As a result, some students might have chosen a college that they ultimately could not afford or preemptively decided that college was too expensive an option to pursue. In contrast, students from wealthier families who were not dependent on federal aid could commit to a college without being held back by the FAFSA delays.

Source: GAO analysis of Department of Education documents and interviews and documents from stakeholders. GAO-24-107407

Note: For additional information on the importance of college financial aid offers, see GAO, *Financial Aid Offers: Action Needed to Improve Information on College Costs and Student Aid*, GAO-23-104708 (Washington, D.C.: Nov. 1, 2022).
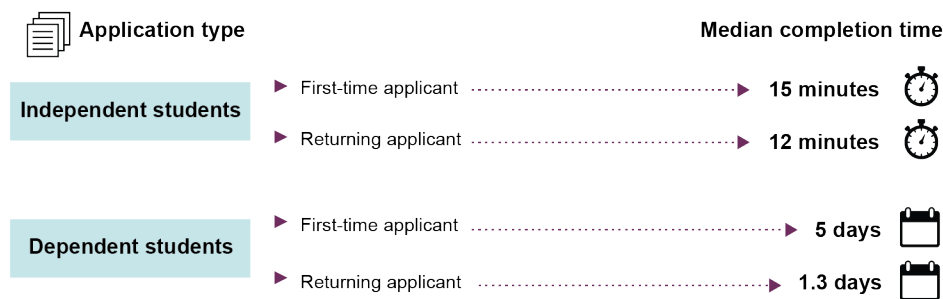
It Took Certain Applicants Several Days to Complete the New FAFSA Application

Education has touted the new FAFSA form as being faster and easier to fill out, but many students and families encountered significant challenges trying to complete it. Representatives for college administrators and a college access group we interviewed have generally agreed that the simplified form was more streamlined and would eventually be easier for most students to complete once Education fixed the initial technical issues and problems. Education has also stated in press releases and other public statements that the form could be completed by most applicants in 15–20 minutes. In practice, however, the only group of applicants who were generally able to finish the application during this short time period were independent students who could complete the form entirely by themselves without needing input from a spouse or parent.[19] A key determinant of how long it took to finish the application was whether a student's spouse or parent was also required to complete part of the FAFSA form. For example, by May 2024, when Education had already rectified many of the initial technical problems, it still generally took first-time applicants who were dependent students and needed parental input a median time of 5 days to complete the application (from the day they started till the

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[19]An independent student is one of the following: at least 24 years old, married, a graduate or professional student, a veteran, a member of the armed forces, an orphan, a ward of the court, or someone with legal dependents other than a spouse, an emancipated minor, or someone who is homeless or at risk of becoming homeless.

day they submitted it) (see fig 5).[20] Education did not collect comparable data during prior years, but likely has the capacity to do so going forward.

Figure 5: Median Time That Elapsed between When Students Started and Completed the Free Application for Federal Student Aid (FAFSA), by Application Type (for applications started in May 2024)

Application type   Median completion time

Independent students
- ► First-time applicant ·························► 15 minutes
- ► Returning applicant ·························► 12 minutes

Dependent students
- ► First-time applicant ·························► 5 days
- ► Returning applicant ·························► 1.3 days

Source: GAO analysis of Department of Education data; Adobe Stock (icons). | GAO-24-107407

Accessible Data for Figure 5: Median Time That Elapsed between When Students Started and Completed the Free Application for Federal Student Aid (FAFSA), by Application Type (for applications started in May 2024)

Application type	Category	Median completion time
Independent students	Student	13–14 minutes
Independent students	Student and spouse	4.9 days
Dependent students	Student and one parent	2 days
Dependent students	Student and two parents	9.5 days

Source: GAO analysis of Department of Education data; Adobe Stock (icons). | GAO-24-107407

Notes: The data are for applications started in May 2024 that were submitted through July 25, 2024, and capture the amount of time that elapsed from when a student started the application until they submitted it. It does not mean that applicants were actively working on the form for the entire time. The completion times for independent students do not include the less common cases in which a married student's spouse was a required FAFSA contributor (e.g., due to "married filing separately" tax status). The median completion time for this group was about 5 days. Similarly, the completion times for dependent students do not include the less common cases in which both parents were required FAFSA contributors (e.g., due to parent's "married filing separately" tax status). The median completion time for this group was about 9.5 days. An independent student is one of the following: at least 24 years old, married, a graduate or professional student, a veteran, a member of the armed forces, an orphan, a ward of the court, or someone with legal dependents other than a spouse, an emancipated minor, or someone who is homeless or at risk of becoming homeless.

The time it takes families to complete the FAFSA is affected in part by the new identity verification steps that were implemented as part of the FUTURE Act provisions and should ultimately improve program integrity. These new steps require parents and spouses to register for an account and have their Social Security numbers verified before they can access their applicant's FAFSA.[21] Education officials said this data matching with the Social Security Administration takes 1 to 3 days to complete.[22] However, Education officials also

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[20]This captures the amount of time that elapsed from when a student initially started the application till when they submitted it. It does not mean that applicants were actively working on the form for the entire time. Data is for FAFSA applications started in May 2024 that were submitted through July 25. The 5-day median completion time is for dependent students with one contributor. The median completion time was longer (9.5 days) for dependent student with two contributors (e.g., married parents who filed taxes separately).

[21]The department encourages students, parents, and spouses to complete the identity verification process prior to starting the form, according to Education officials.

[22]Education officials said the department conducts a data match with the Social Security Administration each night, except over the weekends. Therefore, students and families who wait until the weekend to start working on their FAFSA may need to wait up to 3 days until they can access the application.

acknowledged that other factors and inefficiencies in the application process further prolonged the time it took families to complete a FAFSA.

These inefficiencies and other components of the FAFSA application process were also burdensome for many families, according to representatives for high school counselors and college access groups we interviewed. For example, there are still at least six unresolved technical issues that specifically affect parents and spouses, some of which can temporarily limit their ability to access and complete the form.[23] These include problems inviting spouses to contribute to the form, technical roadblocks in the application that prohibit some parents from progressing, and impediments that leave some parents unable to make changes or corrections to the form. In addition, one representative from a college access group said that, in prior years, counselors could work with students to complete most of the form in one sitting. However, this year counselors needed multiple one-on-one support sessions with both the student and parents, which were difficult to coordinate. As a result of these inefficiencies and lags in the process, it took longer than necessary to collect information from their spouse or parents. Stakeholders told us that the longer it takes for a student to complete a FAFSA, the less likely students and families are to finish it.

One of the key goals of the FAFSA Simplification Act and an objective in Education's Office of Federal Student Aid's strategic plan is to make the FAFSA easier and less burdensome for students and families.[24] However, the median completion time for certain students and families illustrates that the FAFSA imposes a time burden on certain applicants. If Education does not address the remaining technical issues, bottlenecks, and inefficiencies surrounding parent or spouse contributor submissions, then the burden and extended time it takes to complete the form may continue to hinder and discourage some families from completing the FAFSA.

Students Whose Parents or Spouses Do Not Have a Social Security Number Continue to Face Additional Barriers to Completing the FAFSA

Education's FAFSA submission process was burdensome for students whose parents or spouses do not have a Social Security number, hereafter referred to as "mixed-status families".[25] As of August 26, 2024, 339,600 such students had submitted a FAFSA, and more were potentially still struggling to complete the form. This population encountered significant barriers to (1) accessing and starting a FAFSA application and (2) completing and submitting their FAFSA.

Accessing and Starting a FAFSA Application

Mixed-status families faced delays and barriers from the very beginning of the process. Education's new FAFSA process requires all students and their parents or spouses to sign up for a Federal Student Aid ID and

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[23]This count of technical issues is based on Education's 2024-25 FAFSA Issue Alerts, as of September 16, 2024 (see: https://fsapartners.ed.gov/knowledge-center/topics/fafsa-simplification-information/2024-25-fafsa-issue-alerts).

[24]U.S. Department of Education, Office of Federal Student Aid, *Federal Student Aid: Strategic Plan, Fiscal Year 2023–2027.*

[25]Students generally must have a Social Security number to be eligible for federal student aid. To receive federal student aid, a student must be a U.S. citizen or U.S. national, a citizen of the Freely Associated States (the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau), or a lawful U.S. permanent resident or other eligible noncitizen. We use the term "mixed-status family" to broadly refer to families in which the student is eligible to apply for the FAFSA and their contributor(s) (i.e., parent or spouse) does not have a Social Security number. Most contributors in mixed-status families are parents, and spouses made up 6 percent of all contributors without Social Security numbers.

to have their identities verified before they can access the FAFSA.[26] Education officials said this step was necessary to implement the FUTURE Act's provisions to pull students' and parents' financial information directly from the IRS, when possible, which leads to better data accuracy.[27]

Parents or spouses who have Social Security numbers have their information automatically sent to the Social Security Administration for verification. However, Education's electronic verification process for mixed-status families did not work as intended. Between 15 and 40 percent of parents without Social Security numbers were able to have their identity verified automatically, depending on when they attempted to validate their identity, according to Education.[28]

Since the electronic verification process did not work for the majority of mixed-status families, they instead had to have their identities verified through a manual process before being able to access their student's FAFSA. This process required individuals to submit a signed attestation and validation form along with copies of identity documentation for review (e.g., driver's license, foreign passport). However, the manual process was burdensome and took a long time to complete. As a result, only 39 percent of the approximately 219,000 parents and spouses without Social Security numbers and other FAFSA applicants who went through manual verification had completed the process, as of June 13, 2024.[29]

We identified two primary causes for the delays experienced by parents going through the manual verification process. First, Education substantially underestimated the number of individuals who needed to be manually verified. Education planned for only 3,500 individuals to be manually verified, less than 2 percent of the approximately 219,000 parents and spouses who actually ended up going through the manual verification process.[30] As a result, Education and its contractors did not have enough staff to review the manual verification

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[26]The primary mechanism for authenticating a user is to match their Social Security number to administrative records held at the Social Security Administration.

[27]The FUTURE Act requires that, as a condition of eligibility for federal student aid, individuals must affirmatively approve the disclosure of tax return information from the IRS to Education. Failure to consent will result in an incomplete submission and the student will not be eligible for federal student aid.

[28]If the student, parent, or spouse does not have a Social Security number or the Social Security Administration is unable to verify the identity of an individual (e.g., Social Security number does not match), the department created a secondary identity verification process, which required individuals to answer knowledge-based questions through a partnership with TransUnion. According to Education officials, the TransUnion identity validation matched 77,563 cases from December 27, 2023, to June 13, 2024. The average TransUnion match rate was around 15–20 percent initially. Education implemented changes to the match logic around April 22, 2024, and it increased the subsequent match rate to 35–40 percent, according to Education officials. Individuals who fail the TransUnion verification processes will be required to go through the manual verification process.

[29]The total population of applicants who used the manual verification process included parents without Social Security numbers and other applicants or contributors, such as students from the Freely Associated States (Federated States of Micronesia, Republic of the Marshall Islands, and the Republic of Palau) and those who declined to provide a Social Security number and were not matched via the TransUnion process.

[30]The data are from July 13, 2024. Education's estimate of the number of individuals to be manually verified is from its Supporting Statement for Paperwork Reduction Act Submission (OMB Number: 1845-0179), submitted May 1, 2024. Education said it underestimated the number of individuals who would need to be manually verified because it did not take into account the need of students' parents and spouses who do not have a Social Security number to go through this process, a new requirement for the current cycle. The estimate considered only students and parents from the Freely Associated States.

forms, so parents and spouses undergoing this process had to wait an average of 22 days to get verified and to have access to the FAFSA, according to Education data.[31]

Second, Education relied on an inefficient and burdensome process for parents to email required documentation to be manually verified, according to officials from a college access organization. According to Education officials, when applicants did not submit all the necessary documentation or did not produce copies that were of sufficient quality, the process took longer. Federal agencies and businesses often use online portals for collecting similar documents, along with other technologies in part because these portals can automatically check the type and quality of uploaded images. In contrast, parents who emailed copies of their documentation to Education had to wait for department staff to review each submission to determine whether they submitted appropriate documents.

In recognition of the issues faced by these families, Education announced on April 30, 2024 that it was making a temporary adjustment to allow parents and spouses without Social Security numbers to skip ahead and access a student's application while they are awaiting the completion of the identity validating process.[32] However, Education officials said they will eventually reinstate the identify verification requirement for mixed-status families, as required by the FUTURE Act, once they fix various technical issues.[33]

Completing and Submitting a FAFSA Application

Even once mixed-status families had their identity verified, these students faced unique barriers to completing their FAFSA. For example, these students were effectively unable to complete a FAFSA until March 12, 2024, over 2 months after the launch of the new FAFSA, due to a technical issue that prevented any parent or spouse without a Social Security number from accessing the form. The only suggested option students had prior to March 12th was to submit an incomplete FAFSA without their parent or spouse's signature.

Students from mixed-status families also faced unique barriers when inviting their parents or spouse to contribute information to their FAFSA after they obtained a Federal Student Aid ID. Students typically invite family members using their Social Security number. However, family members without Social Security numbers are matched to the students' applications using other personally identifiable information, such as their names and addresses. This process is prone to errors that prevented the invitation from working since students have to match the information exactly to what their parent or spouse used when registering for an account. For example, an input of "Road" instead of the abbreviation "Rd." would not result in a match. Education officials and stakeholders from a college access organization said that matching on addresses instead of a Social Security number required coordination and caused complications in the invitation process that made it more difficult for mixed-status families to complete the FAFSA.

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[31]Education said this average time to verify was affected in part due to applicants sending and resending required documentation.

[32]The previous process required parents and spouses to be verified before they could access the form. Education announced on July 30, 2024, that it would continue to suspend the manual verification requirement for this population for the 2025-26 FAFSA cycle. When the suspension ends, Education will not require retroactive verification of previously submitted applications, according to department officials. Once applicants complete their identity verification, they do not need to verify their identify again in subsequent FAFSA cycles, according to Education officials.

[33]Pub. L. No. 116-91, § 6, 133 Stat. 1189, 1194 (2019).

In addition, Education has not developed functionality for mixed-status families to use the time-saving feature of transferring their tax information automatically when contributing family members have an Individual Tax Identification Number.[34] Instead, these parents must enter all the required financial information into the FAFSA manually. This manual entry increases the likelihood for errors, according to Education officials. Education has not resolved this issue and has no timeline for fixing it. Education officials said that addressing the technical issues preventing mixed-status families from having their tax information transferred automatically is eventually necessary to meet statutory requirements.

As a result of these technical issues and challenges in accessing and completing the FAFSA, the majority of FAFSAs submitted by students in this population still required a correction as of August 26, such as for missing signatures. As a result, the students are not yet able to complete a necessary step toward accessing federal aid.[35]

Education's FAFSA process continues to place an additional burden on students whose parents do not have a Social Security number. This runs contrary to the department's Office of Federal Student Aid strategic plan goal to advance equity and access to student financial assistance and Education's commitment in its 2023 Equity Action Plan to reduce verification burdens on students receiving financial aid.[36] Although the new FAFSA was supposed to make the application process easier, a senior Education official acknowledged that the new process has made it harder for these families during an August 13, 2024, webinar.[37] Further improvements are needed to reduce the burden for these students and their families.

These FAFSA issues also further exacerbate the broader challenges already facing this vulnerable population. Many of these students are the first in their family to apply to college and as a result are unfamiliar with the financial aid process, according to officials from organizations that work with this student population. Any setbacks, such as delays in receiving a financial aid offer, could derail these students' college pursuits and reaffirm their underlying beliefs that the financial aid process is not for them, according to officials from a college access organization. Unless Education addresses some of the additional burdens in the FAFSA process by making the identity verification process more efficient and determining how to use Individual Tax Identification Numbers to transfer IRS data, these students and their families will continue to face significant challenges accessing and completing a FAFSA.

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[34]According to Education, in the process of resolving the issue that prevented parents without Social Security numbers from accessing the form, department officials realized that the IRS tax data transfer functionality did not allow for individuals who had Individual Taxpayer Identification Numbers to match with the IRS data. (Individual Taxpayer Identification Numbers are issued by the IRS to process taxes for individuals who do not qualify for a Social Security number.)

[35]According to Education data, at least 57 percent (193,947 out of 339,600) of all submissions from students of mixed-status families were rejected by Education due to missing signatures and have not yet been completed as of August 26, 2024. These applications were submitted and processed but missing signatures from at least one parent or spouse, according to Education data. A signature from all family members who contributed to the form is required to complete an applicant's FAFSA submission. Students could have submitted a paper FAFSA as a workaround for this technical issue. However, Education did not recommend this approach because its processing of these paper forms was delayed (the department did not start processing of paper forms until August 2024).

[36]U.S. Department of Education, *Equity Action Plan Update* (2023).

[37]President's Alliance on Higher Education and Immigration, "Supporting Mixed-Status Families in FAFSA Completion" (August 13, 2024), accessed September 18, 2024, https://www.presidentsalliance.org/supporting-mixed-status-families-in-fafsa-completion/.

Education Has Not Consistently Provided Students with Timely and Sufficient Information or Support to Complete the New FAFSA

Nearly Three-Quarters of All Calls to the Education Call Center Went Unanswered during the FAFSA Rollout, and Other Support for Students and Parents Was Limited

Education's call center did not meet the demand for needed support during the FAFSA rollout. Nearly three quarters of all calls to the call center (4.0 million out of 5.4 million calls) went unanswered during the first 5 months of the rollout (see fig. 6).[38] Education's call center was a main resource for applicants who needed assistance to complete and submit the FAFSA.[39]

Figure 6: Total Number of Calls to Education's Call Center, from January 1, 2024, to May 31, 2024

Total calls
5.4 million

Total calls unanswered
4.0 million

Total calls answered
1.4 million
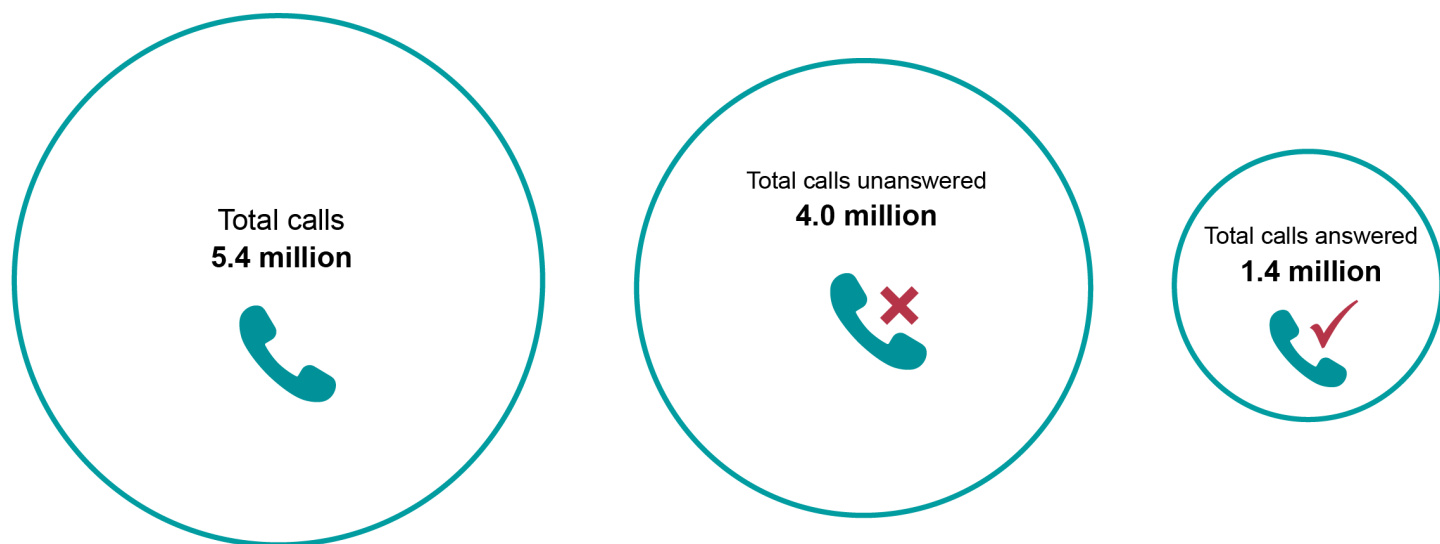
Source: GAO analysis of Department of Education data. | GAO-24-107407

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[38]These calls include a mix of FAFSA and other federal student aid–related calls that the call center is responsible for addressing. According to Education, approximately 48 percent of calls assigned to call center representatives were related to completing the FAFSA form. This does not include calls related to help with the FSA ID, which were classified under a separate broader category. Unanswered calls include calls that were automatically disconnected by the system due to high call volumes (known as throttling) as well as those abandoned by the caller after being on hold. Education assumes that the same caller may have made multiple calls to reach an agent. Education estimates that over half of all unique callers (55 percent) did not have at least one of their calls answered.

[39]In comparison, applicants sought FAFSA assistance through other platforms, including live chats and email inquiries, at a lower rate. According to Education data, Education received 1,336,679 live chat requests from January 2024 through May 2024 and received approximately 190,650 email inquiries from January 2024 through June 2024.

Accessible Data for Figure 6: Total Number of Calls to Education's Call Center, from January 1, 2024, to May 31, 2024

Total calls data
• Total calls (5.4 million)
• Total calls unanswered (4.0 million)
• Total calls answered (1.4 million)

Source: GAO analysis of Department of Education data. | GAO-24-107407

Notes: "Total calls unanswered" is the total of calls that were either automatically disconnected or abandoned by the caller; and "total calls answered" is the total of calls that were answered by a call center agent when offered the call.

Education underestimated students' and families' demand for FAFSA support and understaffed the call center as a result. Education staffed the call center based on its projection it would receive a total of about 2.2 million calls through the first 5 months of the rollout, but it actually received about 5.4 million calls (2.4 times more than estimated) during this time, according to Education data as of July 8, 2024.

Education was also slow to respond to the high demand. Education's prediction of call demand informs the staffing targets for the call center, according to Education officials. It was challenging to quickly adjust staffing levels to meet unexpected demand due to the time it takes to hire and train additional staff, according to Education officials. The call center continued to have fewer agents staffed during the first 5 months of the rollout than during comparable months in the prior year, according to data provided by Education (see fig. 7).[40] As a result, Education's call center answered fewer total calls compared to last year, despite the substantially higher demand during the first 5 months of the rollout. For example, Education's call center answered over 200,000 fewer calls (about 1.4 million compared to about 1.6 million) during the first 5 months of this FAFSA cycle compared to last year, according to department data. Education's call center also answered fewer calls this year than it predicted it could handle. This may be due, in part, to students having more complex issues that took more time to resolve.[41]

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[40]According to Education data, the department caught up with last year's call center staffing levels by July 2024, 7 months after the rollout.

[41]Representatives spent, on average, more time on each phone call during the first 4 months of this year's rollout compared to the same time period last year, according to Education data.

Figure 7: Call Center Staffing Levels for the Current Free Application for Federal Student Aid (FAFSA) Cycle Compared to the Prior Year

Total active agents

Total active agents prior FAFSA cycle

Total active agents current FAFSA cycle
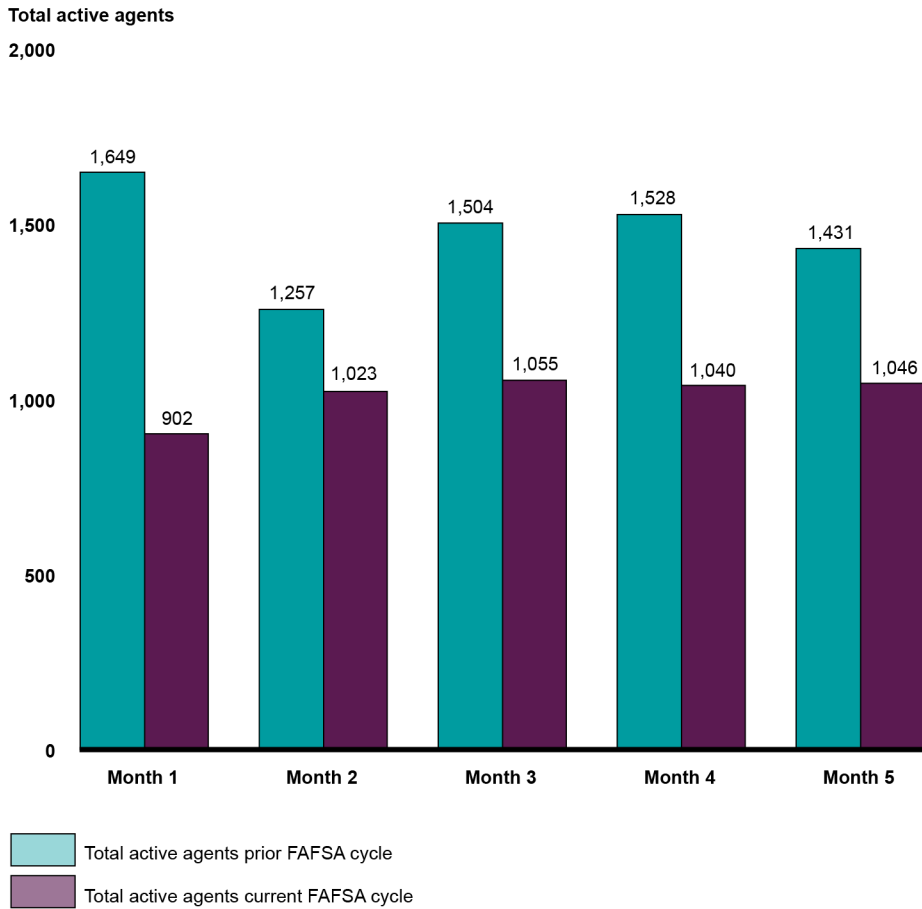
Source: GAO analysis of Department of Education data. | GAO-24-107407

Accessible Data for Figure 7: Call Center Staffing Levels for the Current Free Application for Federal Student Aid (FAFSA) Cycle Compared to the Prior Year

	Total active agents prior FAFSA cycle	Total active agents current FAFSA cycle
1 month after launch	1,649	902
2 months after launch	1,257	1,023
3 months after launch	1,504	1,055
4 months after launch	1,528	1,040
5 months after launch	1,439	1,046

Source: GAO analysis of Department of Education data. | GAO-24-107407

The call center's failure to meet demand became a significant bottleneck for students and families who struggled to get help with pressing issues that delayed or entirely prevented them from successfully accessing and completing the FAFSA. Even those callers who did reach a call center representative expressed high levels of dissatisfaction with their experience. All four call center contractors failed their customer satisfaction

score during the first 5 months of the rollout.[42] The frustration in being unable to get support from the call center could have been a contributing factor to the overall dissatisfaction of applicants who eventually reached a representative.

Education also used the call center as its method of providing FAFSA translation services for individuals who spoke languages other than English and Spanish, according to department officials. The FAFSA Simplification Act requires Education to eventually develop and make publicly available versions of the FAFSA in 11 of the most common languages spoken by English learner students and their parents.[43] Education currently offers the FAFSA in English and Spanish only, and officials said they do not yet have plans or timelines for developing any additional translations. They added that the FAFSA will not be available in other languages through at least the upcoming cycle (corresponding with the 2025-26 award year). Education officials said students and their family members could request translation services through the call center. However, it was difficult for students and parents to reach a call center representative.

Further, Education provided confusing guidance on how families could obtain call center translation services. For example, the instructions on Education's website tell users to contact the call center and press the number 7 on their phone for translation services, but when someone calls the call center line, the number 7 is not a phone tree option. The only two language options that callers can easily access through the phone tree are either English or Spanish. Therefore, callers would likely struggle to figure out how to request translation services for any of the other ten most-common languages spoken by English learner students and their parents. Unless Education makes more progress towards translating the FAFSA into additional languages and provides clear pathways to call center language supports, families will continue to face language barriers to completing the FAFSA.

Education officials acknowledged that they underestimated call demand this cycle, and that different factors, such as changes to this year's form and the various delays, created a surge in demand for call center support. Education's failure to meet this demand runs contrary to the department's Office of Federal Student Aid strategic plan goal to improve customer service and outcomes for students and borrowers.[44] Education officials said they will use this cycle's call center demand to inform call center staffing for the upcoming cycle but have not yet completed their call demand estimates for the months following the full release of the next application cycle by December 2024.[45] It is unclear whether these estimates will account for the fact that students are still adjusting to a new FAFSA process and therefore will continue to need high levels of support. Unless Education improves its call forecasting and ensures there is sufficient staff capacity at the call center, it may once again struggle to manage call demand and fail to provide adequate customer service during the next application cycle (2025-2026).

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[42]To receive a passing score, the contractors needed 85 percent of callers with answered calls to provide a customer satisfaction score of 3 out of 5 or higher in a post-call survey.

[43]Pub. L. No. 116-260, div. FF, tit. VII, 134 Stat. 1182, 3179 (2020).

[44]U.S. Department of Education, Office of Federal Student Aid, *Federal Student Aid: Strategic Plan, Fiscal Year 2023–2027.*

[45]Officials said this is usually done 2 months before the FAFSA cycle begins.

Education Did Not Consistently Provide Timely Updates on the Status of Students' FAFSA Applications or Offer Solutions to Technical Barriers

Education did not consistently provide students with timely information about (1) the status of delays in processing their applications, (2) changes in their eligibility for federal student aid, or (3) solutions to technical barriers they encountered during the application process.

Status Updates

Education did not provide students with timely updates about delays in the processing of their FAFSA applications. For example, Education did not send any direct communication to students about the status of their submitted applications for nearly 2 months after the launch of the FAFSA, other than a confirmation screen and automated email students received after their submission. Although students could begin submitting applications on December 30, 2023, Education did not email any of the 3.5 million initial applicants until February 20, 2024, to inform them their forms had not yet been processed.[46] Moreover, Education provided vague timelines to students about their status, stating in their email that students' applications would be processed and sent to schools "in the coming weeks" and that students could correct any errors in their applications "at a later time." Education also did not notify students when their application was eventually processed, according to Education officials.

Education officials said they instead focused their email communications on students who were struggling to complete the form. In the absence of timely communication to students about processing delays, the burden was placed on students to proactively monitor their online account for status updates to determine if their application had been processed.[47] Education officials also said they plan to add functionality for the next cycle (2025-26) to automatically send emails to applicants when their form has been processed.

Education also did not provide any confirmation that it had received applications from the approximately 34,000 students who applied solely using paper forms, nor did it notify these students directly that it was delaying processing of their forms until at least August 2024.[48] As a result, this group of students did not receive any information about the status of their application for up to 7 months after they submitted their application.[49] Education's lack of timely information about the status of applications placed undue stress on applicants and

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[46]Education announced in a press release on January 30, 2024, that the processing of forms would be delayed until mid-March, but Education did not proactively notify students who had already submitted FAFSAs until 21 days later after the press release. Further, when students completed their FAFSA in the initial month of the rollout, the confirmation screen provided information on what they should expect as next steps, including informing students that colleges will receive their FAFSA information starting in late January (in actuality, the information was not provided to schools until mid-March). The confirmation screen also advised students that they could check the status of their application on their StudentAid.gov account. However, students could have spent months checking their accounts before there were any changes to their application status.

[47]Students' online dashboard informs students if their application is (1) "in review" (i.e., submitted but still processing), (2) "processed," or (3) "action required" (e.g., the applicant may need to address an error).

[48]Education officials said that students typically submitted paper forms because they lacked access to the internet (e.g., students with poor broadband and incarcerated students) or to meet an aid or scholarship deadline prior to the availability of online processing.

[49]Although Education did not provide timely updates to paper FAFSA applicants, it did post information on its website. However, some of the information was inaccurate. For example, as of August 2024 Education's public Frequently Asked Questions website still incorrectly stated that the paper application would be processed in the first half of March 2024 rather than the actual date of August 2024, further contributing to applicant confusion.

complicated their decision-making process about if and where to enroll in college, according to an organization representing college counselors and a college access organization we interviewed.

Changes to Aid Eligibility

Education did not notify FAFSA applicants when changes occurred to their aid eligibility after they submitted their form. For example, when Education belatedly adjusted the aid calculations to account for inflation, which it did about a month after the release of the FAFSA, the department did not notify the approximately 3 million students who had already submitted FAFSAs about this change, according to Education officials. Some of these students may have relied on the inaccurate estimate of the financial aid eligibility they received when they submitted their FAFSA to make decisions about which college they could afford.[50]

Similarly, Education did not send any notifications to the more than 500,000 students that their aid eligibility had been recalculated due to other errors Education made during the initial processing of their applications.[51] For at least 120,000 of these students, the initial errors had resulted in them incorrectly being eligible for more financial aid than the correct recalculated amount, according to Education data. In these cases, Education still allowed colleges to use the initial inaccurate FAFSA calculations to determine the students' aid package. However, Education did not inform affected students that their aid packages could be based on inaccurate information, according to Education officials. These students potentially selected colleges based on an inflated aid package that will likely decrease in the following year.

Solutions to Technical Barriers

Education also did not regularly provide applicants who encountered one of more than 40 known technical issues affecting the FAFSA process with timely information on available solutions.[52] In many cases, affected students could not submit an application until the technical issue was resolved or a temporary solution was identified.[53] However, we identified multiple instances in which Education could have proactively notified applicants who experienced technical issues when resolutions or workarounds were identified, but the department did not. For example, Education did not compile lists of applicants who were seeking support, such as through the call center or online chat, and notify them when the issue had been resolved. Instead, Education's internal guidance instructed call center representatives to advise applicants who were

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[50]When students submit their FAFSA, Education immediately provides them with an estimated student aid index—an indicator of how much financial support they will need—and the amount of Pell grants they may receive. Students can access an official student aid index once their FAFSA submission is processed by reviewing their FAFSA Submission Summary at studentaid.gov. Colleges' financial aid offers also detail the amount of aid they will receive. Education officials said that because these financial aid offers were based on the updated aid calculation that accounted for inflation, students were likely making college decisions based on accurate aid information. However, some students had to wait months before they received a financial aid offer due to delays in FAFSA processing. Some of these students felt pressure to commit to a school before they received a financial aid package that reflected the inflation adjustment, according to organizations we interviewed.

[51]In total, Education reprocessed approximately 1.67 million FAFSA applicants' records due to processing or data errors, according to Education data. Some errors did not result in a change to students' eligibility, mostly due to the student already receiving the maximum award before and after the reprocessing, while in other cases Education was unable to determine the effect on a student's eligibility given the timing of the resolution and the variety of issues occurring at that time.

[52]This count of technical issues is based on Education's 2024-25 FAFSA Issue Alerts, as of August 2024 (see: https://fsapartners.ed.gov/knowledge-center/topics/fafsa-simplification-information/2024-25-fafsa-issue-alerts).

[53]Education officials said they could not provide an estimate of how many users were affected by all the known technical issues affecting the FAFSA process.

experiencing technical issues with no known solution to "try again later."[54] This approach put the burden on the applicant to continually attempt to navigate the application process until Education resolved the issue, which sometimes took months.

In other cases, the FAFSA application displayed error messages when an applicant encountered a technical issue, but the error messages did not include details on available workarounds or temporary solutions. For example, certain students with a parent who has a foreign address received an unhelpful error message when they invited their parent to contribute to their FAFSA form. The error message instructed the student to "exit the FAFSA form and try again," which still would not solve the issue (see fig. 8). To successfully complete their FAFSA submission, these applicants had to follow a multistep workaround, but the error message did not include any details on how to do this.[55] Applicants who did not know about the temporary solution had to keep unsuccessfully trying to complete their application until Education resolved this technical issue on March 8th, over 2 months after the start of the rollout.

Figure 8: Screenshot of Free Application for Federal Student Aid (FAFSA) Error Message for Students Who Were Unable to Invite Parents to Contribute to Their Application
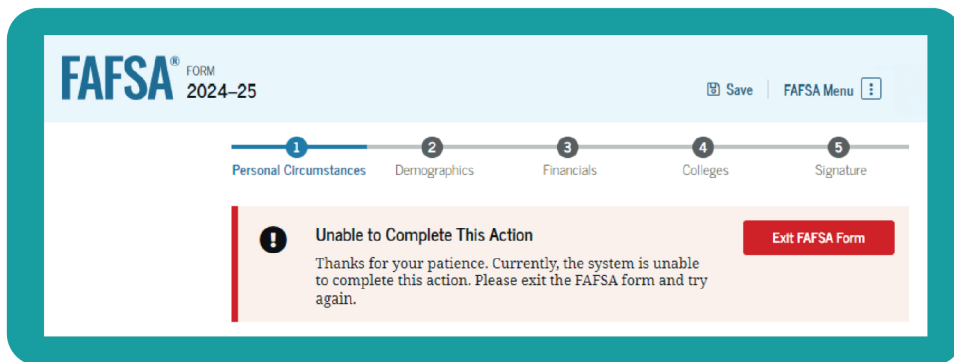
Source: Screenshot from Department of Education. | GAO-24-107407

Accessible Text for Figure 8: Screenshot of Free Application for Federal Student Aid (FAFSA) Error Message for Students Who Were Unable to Invite Parents to Contribute to Their Application

FAFSA form 2024-25

Source: Screenshot from Department of Education. | GAO-24-107407

Note: This error message displayed specifically for students who tried to invite their parents to contribute to their FAFSA when their parent did not have a Social Security number and also had a foreign address. Following the instructions here to exit the form and try again would not fix the error.

Education could have also proactively sent an email to notify applicants who would likely encounter a technical issue. For example, due to a technical issue, applicants who were born in the year 2000 could not progress past a certain page in the online application, preventing them from submitting their application. Education could have emailed all likely affected applicants to inform them of the error and again to notify them when the issue

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[54]We reviewed two internal Education documents designed to help representatives answer questions from callers about technical issues. The first guide, dated April 26, 2024, lists resolved issues. The second guide, dated May 29, 2024, lists current (i.e., unresolved) known issues.

[55]According to Education's instructions for the workaround, the parent(s) must first temporarily change their actual foreign address to a fake U.S. address in the FAFSA system. The student then must invite their parent to contribute to their FAFSA form using the fake U.S. address. After accessing the form, they then need to update their account to their actual address.

was resolved.[56] However, Education never notified affected applicants of this issue, so instead, applicants had to keep trying to complete the FAFSA until Education resolved the issue on March 8th. In the absence of proactive outreach from Education about the various FAFSA technical issues, students and their families struggled to find solutions.[57]

Education undertook multiple initiatives to communicate with students, but gaps in providing timely information remain. Starting in mid-April, Education began a series of email campaigns to students, including general emails encouraging students to submit a FAFSA and targeted emails to applicants who needed to take further action to complete their application. For example, Education sent an email on April 19, 2024, to approximately 525,000 students whose applications were missing a signature. The department did not have the functionality to automatically send individual emails to applicants when they experienced select issues, according to department officials.[58] Instead, emails had to be sent in batches which affected timeliness.

Education used other communication methods as well to connect with students, including a social media campaign, FAFSA webinars for students, and over a dozen videos available on its FSA website to answer questions. However, stakeholders we interviewed raised concerns that these outreach efforts were not timely or did not reach their intended audience. Education officials also expressed concern that students were not aware of the FAFSA videos and they were underused.[59]

Education missed key opportunities to provide students with the information they needed, and students struggled as a result. Standards for internal control in the federal government state that management should communicate quality information with external parties to achieve the entity's objectives.[60] Further, Education's Office of Federal Student Aid's strategic plan emphasizes leveraging tools that provide specific information to students and families when they need it the most and providing accurate and seamless interactions.[61] Education relied on a patchwork of communication planning documents to guide its communications to students during the initial rollout, such as a calendar for sending emails to students and a separate document with dates for posting videos and social media posts. When challenges emerged, however, the department had to quickly adjust, and these documents were not sufficient to ensure students received the communications they needed.

Education does not have a comprehensive communication plan that includes steps to provide FAFSA applicants with timely updates on the status of their application and solutions to technical barriers, according to Education officials. Education officials said they had to make tradeoffs around the timing and amount of emails

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[56]For example, Education could have queried all students with a birth year of 2000 who started but had not submitted the application.

[57]Education maintains a public webpage that lists the major technical issues FAFSA applicants had encountered and the associated temporary solution, if available. However, the information on the webpage is targeted to colleges and other partners that the department relies on to assist students, according to Education officials. Even if applicants happened to find this website (which was not broadly publicized), the instructions were likely too technical for most students to understand, according to Education officials and stakeholders from an organization representing high school counselors.

[58]Education officials said they were working toward improving automation of emails for the next cycle.

[59]Videos embedded within the electronic FAFSA form, such as a video describing what happens after the FAFSA is submitted, received more views, according to Education documents.

[60]GAO-14-704G.

[61]U.S. Department of Education, Office of Federal Student Aid, *Federal Student Aid: Strategic Plan, Fiscal Year 2023-2027.*

sent to applicants by taking into account the department's capacity to send communications and the risk of overwhelming applicants with too much information. Education officials said they are planning to expand communication efforts and they are developing a comprehensive communication plan, but they have not yet completed one for the next cycle (2025-26). A comprehensive plan that considers these factors and includes strategies to provide applicants with timely information and solutions to technical barriers could help the department strike the right balance of the timing and frequency of communications.

Students and their families need to receive clear communication, particularly when the process is not working. Instead, Education's lack of clear communication stoked confusion among students, who did not know what, if any steps, they needed to take to complete their application or how to resolve technical barriers. With the next year's FAFSA rollout already delayed up to 2 months and over 20 technical issues still unresolved as of August 2024, students would benefit from more timely and proactive communication from Education going forward.

Education Did Not Provide Reliable Timeframes or Communicate Changes to Colleges in a Timely Manner

Education consistently failed to meet promised deadlines and provide colleges with sufficient notice of changes to timeframes throughout the rollout of the current FAFSA cycle. For example, officials from one association representing college administrators cited multiple instances of Education's unreliable timeframes and last-minute communication.

Communication of FAFSA Processing Delays. Education did not provide colleges with any advanced warning that it was not going to meet its initial promised deadline for delivering the student FAFSA records colleges needed to develop student aid packages.[62] Education initially notified colleges that it would begin sending student records by the end of January 2024. However, on January 30, 2024—the day before colleges expected to begin receiving the records—Education announced that the department was further delaying their delivery until mid-March. According to Education, the delay was due to the need to adjust the financial aid eligibility calculations for inflation, which resulted in an estimated additional $1.8 billion in student aid.

As a result of Education's last-minute announcement of the delayed student FAFSA records, colleges had to quickly adjust their internal timelines and processes for preparing financial aid offers and sending them to students. Moreover, colleges had planned around Education's initial timeframes, and when Education changed those timeframes with no advance notice, it was challenging for colleges to shift their staffing resources, according to officials from two associations representing college administrators. For example, some financial aid offices had reserved time with their college's information technology staff (which they shared with other offices) based on the anticipated arrival of student FAFSA records. They then had trouble securing IT support when student records arrived later than anticipated, according to officials from one of these associations.

Communication of college corrections of FAFSA records. Education did not meet multiple deadlines for providing colleges with functional tools these institutions needed to make corrections to student records and

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[62]FAFSA student records—officially known as Institutional Student Information Records—are sent to colleges designated by the student on the FAFSA. Colleges generally cannot provide students with financial aid packages without first receiving a processed student FAFSA record from Education.

then exacerbated the problem by not informing colleges of these delays in a timely manner.[63] Education repeatedly delayed when colleges would have functionality for submitting corrections through an automated batch process, a function typically available when the FAFSA goes live.[64] This functionality was not available when the FAFSA application was launched in late December 2023, and Education initially provided colleges with a vague timeframe, saying it would be available "in the weeks following" the January delivery of student records. The department subsequently announced a series of postponements that pushed the expected release of the functionality back to July, then to mid-August, and finally—in a reversal of their prior pledge—the department announced on July 30, 2024, that it would not provide the batch corrections function at all during this cycle (2024-25).

Education officials have acknowledged that their delay in notifying colleges that they would not be able to use batch corrections created additional burdens for colleges. The only option available to colleges currently is to submit corrections individually through a manual process, which has been available since June 30, 2024.[65] Many colleges' financial aid offices were waiting to make corrections until Education's batch correction functionality was available because it would allow them to more efficiently and accurately submit FAFSA corrections. Education's failure to promptly notify colleges that the manual functionality would be their only option resulted in colleges wasting multiple weeks during a critical time. Had Education informed the colleges earlier, they could have dedicated staff and resources to the time-consuming process of manual corrections. Instead, colleges had to rush to manually input information, up to thousands of records at larger schools, according to officials from an association representing college administrators.[66]

As a result of Education not communicating changes in a timely manner, some colleges will likely not be able to disburse financial aid dollars on time, according to officials from an association representing college administrators. Colleges generally must have a correct student record to disburse student aid.[67] Delays in receiving financial aid may lead students to decrease their courseload or opt out of college altogether, according to officials from a college counseling organization.

Taken together, Education demonstrated a pattern of not providing colleges with reliable timeframes and communicating changes or delays in a timely manner during its rollout of the new FAFSA. As a result, colleges

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[63]Colleges may make corrections to a student record to resolve incorrect or conflicting information. Colleges may also need to make a correction to exercise professional judgement to adjust a data element in the calculation of a student's aid eligibility, such as a change in a student's dependency status or financial situation (e.g., the loss of a job).

[64]The batch corrections function allows colleges to make and upload multiple corrections to Education at one time. Without this function, colleges would need to manually input corrections for student records individually into Education's system.

[65]On July 30, 2024, Education announced that colleges could request technical assistance at no cost to assist in manually processing corrections. The department is making this support available—prioritized by need and volume of corrections—via external service providers by expanding its FAFSA College Support Strategy. Through this effort, the department has assisted over 300 colleges with processing FAFSA data and providing aid offers to students, according to Education. As of August 29, 2024, over 120 colleges have requested assistance with corrections, according to Education.

[66]Colleges made over 670,000 batch corrections in the prior year's FAFSA rollout as of July 15, 2023, according to Education data. Given the various technical issues, the number of corrections needed may be higher in the current FAFSA cycle, according to officials from an association representing college administrators. According to Education officials, there are a number of reasons corrections might be higher this year, including some reasons that might result in students having access to additional aid.

[67]Education allowed some colleges to make interim aid disbursements based on an estimated student aid index before college corrections were available, but colleges were responsible for submitting corrections later and recovering any overpayments to students. Representatives from a college association told us that colleges generally do not use this option due to the risk of overpayment.

operated in an environment of uncertainty about how to both plan for and execute the new FAFSA process, affecting when they could send aid offers to students and when they could disburse student funds. According to Education, the most common feedback from college officials and other stakeholders was the need for early and predictable timelines and increased transparency from the department.[68] Officials from two associations representing college administrators told us that due to Education's repeated failure to meet stated deadlines, colleges no longer trust Education's communications about timelines.

This lack of reliable and timely information from Education does not align with its Office of Federal Student Aid's strategic plan goal to provide effective outreach, including efficiently delivering policy updates and relevant information to partners, such as colleges.[69] Further, standards for internal control in the federal government state that management should communicate quality information with external parties to achieve the entity's objectives.[70]

Education officials said they try to balance timeliness with accuracy when determining how and when to communicate with colleges. However, officials said they don't have formal policies in place to determine when outreach about FAFSA updates should occur. Considering that the FAFSA still does not have complete functionality, colleges will need reliable timeframes and early warning if Education is unable to provide critical functions in next year's FAFSA cycle (2025-26). Reliable timeframes and prompt communication of changes to those timeframes from Education could help ensure that colleges are prepared to efficiently implement all steps of the FAFSA and provide funds to students.

Conclusions

Students and their families depend upon the FAFSA to put a college education within reach and deserve a FAFSA process that works. However, the initial rollout of the new simplified application was afflicted by a litany of delays and issues that derailed students and undermined colleges' operations. Students from families able and willing to pay for college without federal aid could commit to a college without being held back by the FAFSA, but less wealthy students needed the FAFSA to be able to make educated financial decisions about which college they could afford.

With the beginning of the next FAFSA cycle (2025-26) approaching, Education now has an opportunity to learn from its recent errors and fulfill the promise of FAFSA simplification by making the financial aid process easier for everyone. This will require quick and decisive action by Education to connect with students who did not submit an application this cycle, address inefficiencies and barriers in the FAFSA process, and improve communications to applicants and colleges.

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[68]Education did not undergo a public comment period for the upcoming FAFSA form and instead held a series of listening sessions from June to August 2024 with a variety of stakeholders groups including students, parents, colleges and administrators, college access organizations, and state agencies to hear about their experiences with the current FAFSA and gather input on improvements for the upcoming FAFSA cycle. Education also issued a request for information on August 14, 2024, to obtain feedback from the public and other partners specifically on how the department could improve support to colleges, applicants, and states for the next FAFSA cycle.

[69]U.S. Department of Education, Office of Federal Student Aid, *Federal Student Aid: Strategic Plan, Fiscal Year 2023–2027.*

[70]GAO-14-704G.

Failure to take these steps will mean that students who were discouraged or impeded from applying during the initial rollout may continue to give up on the application because it is burdensome and takes too long to complete. Students may not be able to obtain the call center support and translation help they need from the department or receive clear communications to help them complete the application. And finally, colleges may remain in the dark about the key timelines they need to know to fulfill their role in the process. Education needs to move quickly to address these issues, along with those highlighted in our companion statement of the FAFSA Processing System and rebuild trust in the FAFSA process.

Recommendations for Executive Action

To ensure Education is better prepared for the 2025-26 application cycle, we are making the following recommendations to Education's Office of Federal Student Aid:

The Chief Operating Officer of the Office of Federal Student Aid should develop an outreach strategy to identify and connect with students who did not submit a FAFSA application this cycle (2024-25) due to delays and technical issues, and to provide them with the information they need to apply during the upcoming cycle (2025-26). (Recommendation 1)

The Chief Operating Officer of the Office of Federal Student Aid should review the FAFSA application process to identify ways to reduce the burden on students and families by addressing the remaining technical issues and streamlining the process for parent or spouse contributors to reduce the total time it takes to complete the FAFSA form. (Recommendation 2)

The Chief Operating Officer of the Office of Federal Student Aid should overhaul its submission process for students whose parent or spouse contributors do not have Social Security numbers to address additional application barriers. This should include making the identity verification process more efficient and determining how to use Individual Taxpayer Identification Numbers to transfer this population's tax data from the IRS. (Recommendation 3)

The Chief Operating Officer of the Office of Federal Student Aid should improve translation services by providing a clear path to support for languages other than English and Spanish through the call center menu and progress toward making the FAFSA application available in languages other than English and Spanish. (Recommendation 4)

The Chief Operating Officer of the Office of Federal Student Aid should plan for and ensure hiring of sufficient staff to increase capacity at the Federal Student Aid Information Center call center to be able to meet call demand and improve customer service. (Recommendation 5)

The Chief Operating Officer of the Office of Federal Student Aid should develop a comprehensive plan for providing FAFSA applicants with timely updates on the status of their application and solutions to technical barriers. (Recommendation 6)

The Chief Operating Officer of the Office of Federal Student Aid should develop policies to communicate key milestones of the 2025-26 FAFSA and future cycles to colleges and stakeholders in a timely and reliable manner. (Recommendation 7)

Chairman Owens, Ranking Member Wilson, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

GAO Contact and Staff Acknowledgments

If you or your staff have any questions about this testimony, please contact Melissa Emrey-Arras, Director, Education, Workforce, and Income Security, at (617) 788-0534 or emreyarrasm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this testimony are Will Colvin (Assistant Director), Brian Schwartz (Analyst in Charge), Jose Altamirano, and Jessica Ard. Additional contributors were Walker Adams, Elizabeth Calderon, Gina Hoover, Mimi Nguyen, and Meg Sommerfeld.

Appendix I: List of Requesters

The Honorable Bill Cassidy, M.D.
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
House of Representatives

The Honorable John Barrasso, M.D.
United States Senate

The Honorable Mike Braun
United States Senate

The Honorable Shelley Moore Capito
United States Senate

The Honorable Susan M. Collins
United States Senate

The Honorable Steve Daines
United States Senate

The Honorable Joni K. Ernst
United States Senate

The Honorable Deb Fischer
United States Senate

The Honorable Charles E. Grassley
United States Senate

The Honorable Cindy Hyde-Smith
United States Senate

The Honorable James Lankford
United States Senate

The Honorable Roger Marshall, M.D.
United States Senate

The Honorable Jerry Moran
United States Senate

The Honorable M. Michael Rounds
United States Senate

The Honorable Marco Rubio
United States Senate

The Honorable Thom Tillis
United States Senate

The Honorable JD Vance
United States Senate

The Honorable Rick Allen
House of Representatives

The Honorable Erin Houchin
House of Representatives

The Honorable Lisa McClain
House of Representatives

The Honorable Burgess Owens
House of Representatives

The Honorable Lloyd Smucker
House of Representatives

The Honorable Michelle Steel
House of Representatives

The Honorable Elise Stefanik
House of Representatives

The Honorable G.T. Thompson
House of Representatives

The Honorable Tim Walberg
House of Representatives

The Honorable Brandon Williams
House of Representatives

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