

February 11, 2022

The Honorable Joseph R. Biden
The White House
1600 Pennsylvania Ave, NW
Washington, DC 20500

Dear Mr. President:

Thank you for all your work to improve our nation's education systems. On behalf of the National College Attainment Network (NCAN), the National Association of Student Financial Aid Administrators (NASFAA), The Institute for College Access & Success (TICAS), and the undersigned organizations, we write to request that the Department of Education (ED) extend, for the 2022-23 award year, the verification waivers granted in GEN-21-05 for the 2021-22 award year. We appreciated ED's assurance in Electronic Announcement VERIF-21-02 that the waivers were under consideration for 2022-23. But — for students and institutions — it is crucial that this action be taken as soon as possible, given imminent priority aid deadlines for state and institutional aid.

Given alarming college enrollment declines — especially among students of color, low-income students, and first-generation students — we urge the Administration to act quickly to reduce the burden that students are facing in accessing financial aid. Research shows the verification process, as carried out prior to the pandemic waiver, disproportionately depressed college-going for these very same populations. There is also clear evidence that verification makes minimal impact on improper payments and therefore does not justify the significant burden that it imposes on students.

Returning to the pre-pandemic approach to verification threatens to further exacerbate the inequitable effects of the pandemic on marginalized student populations and their future economic opportunities. Continuing the verification waivers is smart policy that works for taxpayers and exemplifies good government.

The upcoming implementation of the FAFSA Simplification Act and the FUTURE Act for the 2024-25 award year should effectively limit improper payments arising from misreported family and income information on the FAFSA when FAFSA data begins to come directly to ED from the IRS, reducing the need for verification altogether. Until this implementation is complete, ED should work to mitigate the burden of verification that prevents too many low-income students from receiving the aid they need to succeed in postsecondary education. Continuing the 2021-22 waivers into the 2022–23 award year would do just that. Extending the relief also aligns with the White House's [call](#) to improve underserved communities' access to government programs. NCAN shared this [view](#) on July 6, 2021 in response to the Office of Management and Budget's request for public comment.

For the 2021-22 award year waivers granted in July 2021, ED cited continued challenges that college students and their families are experiencing because of the ongoing COVID-19 pandemic. Generally, these conditions have not improved for many low-income families who would most benefit from financial aid and, in some respects, conditions have worsened. These negative impacts will linger for vulnerable populations for many months ahead. The administration recognized the effects of the enduring pandemic by further extending the federal student loan repayment relief, and should consider the same for the verification waivers. Such an extension has the potential to immediately help low-income students held up by verification and unable to access their aid, who otherwise may be forced to delay, pause, or altogether forgo enrolling in college.

Further, the pandemic has created a great sense of uncertainty among prospective postsecondary students. This uncertainty is most evident in a sustained decline in rates of FAFSA completion and postsecondary enrollment, when compared to years prior to the pandemic. NCAN [estimates](#) that 2021 high school graduates left \$3.75 billion in Pell Grants unclaimed by not completing the FAFSA. According to the National Student Clearinghouse Research Center, the [losses in postsecondary enrollment](#) during the pandemic equate to nearly a million fewer students. These trends cannot be understated and have the potential for long-lasting reverberations through our society and workforce.

Reflecting on the last FAFSA cycle, the 2021-22 waiver was a necessary and welcome relief to students for whom all aspects of their lives have been disrupted by the pandemic. Institutions also benefited greatly from the relief, given campus disruptions and the additional time and resources they needed to devote to addressing student emergencies, as well as compliance with HEERF grant rules and reporting requirements.

Students received their student aid offers and disbursements earlier than in previous years thanks to the verification waiver. NASFAA conducted a limited [survey](#) of financial aid administrators to gauge the effects of the verification waiver. Several institutions indicated they were able to award aid immediately upon issuance of the waiver to hundreds and even thousands of students whose files had been held up because of missing verification paperwork. One school found that one-third of those students were first-generation students with whom the financial aid office had already done some intervention to assist with verification. Other schools noted that many students who benefitted from the verification waiver were low-income and/or Pell Grant recipients. The institutions surveyed by NASFAA overwhelmingly agreed that their students benefited from verification relief, and most agreed that lifting the verification burden freed up their time to better advise their students.

The impact of verification relief extends beyond securing financial aid. One scholarship director at an NCAN member college access program stated that the verification process shortened the time advisors had to work with students and caused students to be uncertain about college enrollment. Verification relief provided the student support team the opportunity to focus on issues like securing housing, deciphering financial aid packages, and providing social emotional support—all of which increase the likelihood of enrollment for students.

Although we understand concern about improper payment rates, there is evidence that the current income verification is not precise. In 2018, NASFAA [found](#) that 84% of verified applications resulted in either no EFC change or a change so small that it did not result in a change to the student's Pell Grant award. In 2020, NCAN conducted research showing that 93% of applicants with an automatic zero EFC—and more than 70% of all students selected for verification—saw no change to their Pell Grant award amount after verification.

Evidence makes clear that too many students are selected for income verification that does not affect their eligibility and, consequently, does not reduce the improper payment rate. ED wisely chose to retain the identity verification and statement of educational purpose aspects of verification in 2021-22, and should continue to do so if that reduces the likelihood of fraud and abuse in the federal student aid programs. Looking forward, the education community is interested in ways to address the burden students and aid offices experience as a result of the FAFSA verification process; some agreed-upon commonsense solutions are compiled in this [joint report](#) by NASFAA and NCAN.

We urge ED to waive the 2022-23 income verification requirements, as soon as possible. The financial aid and college access and attainment communities alike celebrated the waiver for the 2021-22 award year. While we appreciate ED's willingness to evaluate changes for the current cycle, time is of the essence in making those decisions. Students are making college-going decisions, and institutions have their procedures and systems to consider. With students and institutions balancing many priorities in light of the pandemic, both would benefit from an extension of the verification waiver to this cycle.

Thank you for your consideration of this important matter.

Sincerely,

National College Attainment Network
National Association of Student Financial Aid Administrators
The Institute for College Access & Success

Joined by:

American Association of Community Colleges
American Council on Education
APIA Scholars
Association of American Universities
Association of Public and Land-grant Universities
Association of Young Americans
Center for American Progress
Center for First-generation Student Success
Center for Law and Social Policy

Denise Smith, The Century Foundation
Excelencia in Education
Higher Learning Advocates
Institute for Higher Education Policy
Jobs for the Future
NAACP
National Association for College Admission Counseling
National Association of Independent Colleges and Universities
National Urban League
New America Higher Education Program
The Education Trust
The Hope Center for College, Community, and Justice
uAspire
UnidosUS
Young Invincibles

CC:

The Honorable Nancy Pelosi
The Honorable Kevin McCarthy
The Honorable Chuck Schumer
The Honorable Mitch McConnell
Ambassador Susan Rice
Ms. Carmel Martin
Ms. Katherine Valle
The Honorable Miguel Cardona
The Honorable James Kvaal
Mr. Richard Cordray
Dr. Michelle Asha Cooper