

FAFSA SIMPLIFICATION IMPLEMENTATION SCHOOL CHECKLIST

UPDATED OCTOBER, 2023

Resource(s)	Task	Recommended Timeline
Gain familiarity with FAFSA Simplification Act		
Legislative text	Read FAFSA Simplification Act and Technical Amendments to FAFSA Simplification Act	ASAP
NASFAA FAFSA Simplification web center	Read/review NASFAA summaries of legislative changes	ASAP
FAFSA Simplification Information	Become familiar with Department of Education FAFSA Simplification resources, training materials, and guidance	ASAP
2024-25 DRAFT Pell Eligibility and SAI Guide	Read Pell Eligibility and Student Aid Index Formula Guide	ASAP
(APP-23-13) Notice of the Updated Draft 2024-25 Federal Student Aid Application Materials	Review 24-25 FAFSA materials	ASAP
Estimate Institutional Budget Impact of Pell grant and EFC (SAI) changes		
SAI Modeling Tool	Use SAI modeling tool to estimate institutional budget impacts from: <ul style="list-style-type: none"> • Changes to Pell grant recipients • Changes to Pell grant amounts • Changes to SAI vs EFC 	At least 2 months before 2024-25 financial aid budget decisions are made
SAI Modeling Tool	Use SAI modeling tool to estimate impacts of FAFSA Simplification on state grants and how that may impact your students' need/institutional budget	At least 2 months before 2024-25 financial aid budget decisions are made
SAI Modeling Tool	Use SAI modeling tool inform institutional packaging decisions to hold harmless* certain populations impacted by formula changes: <ul style="list-style-type: none"> • Treatment of more than one student enrolled in college • Treatment of small businesses/farms • Treatment of untaxed income • Treatment of significant differences between SAI and EFC <p><i>*note that use of the new formula will be mandatory for 2024-25 for federal student aid, but that institutions might opt to use a different methodology for institutional funds to mitigate the impact of changes on continuing students.</i></p>	At least 2 months before 2024-25 financial aid budget decisions are made
	Make budget decisions about impacts of new SAI formula <ul style="list-style-type: none"> • Replacing lost Pell grants with institutional dollars • Replacing lost state grants with institutional dollars • Packaging parameters for all aid types 	At least 2 months before 2024-25 financial aid budget decisions are made
	Estimate total institutional budget impact from FAFSA Simplification Act	After completing all steps in this section

Cost of Attendance Changes

NASFAA Summary of FAFSA Simplification Changes	Update COA food allowance to provide for 3 meals/day	ASAP if not already done since these provisions became effective for the 2023-24 award year
NASFAA Summary of FAFSA Simplification Changes	Cost of first professional credential <ul style="list-style-type: none"> • If offering programs that lead to professional credential, add cost of first professional credential to COA <ul style="list-style-type: none"> o Decide if will allow this cost to be added to the COA more than once 	ASAP if not already done since these provisions became effective for the 2023-24 award year
NASFAA Summary of FAFSA Simplification Changes	Decide if will allow cost of computer for < ½ time students	ASAP if not already done since these provisions became effective for the 2023-24 award year
NASFAA Summary of FAFSA Simplification Changes	Update institutionally-owned housing COA component using separate allowance for students with dependents and students without dependents based on the greater of the average or median amount assessed to those students	ASAP if not already done since these provisions became effective for the 2023-24 award year
NASFAA Summary of FAFSA Simplification Changes	Update loan fees allowance to permit only federal loan fees	ASAP if not already done since these provisions became effective for the 2023-24 award year
	Estimate total institutional budget impact from COA changes arising from FAFSA Simplification Act	After completing all steps in this section

Implement New Technology/Make or Request Programming Changes

(CB-23-13) Operational Information – Reporting Federal Work-Study Earnings to the COD System Using the Campus-Based XML Schema Version 1.0a	<NEW> Develop process to extract student-level annual FWS earnings data from finance/payroll/human resources system and to report it using the new Campus Based XML Schema	ASAP (December, 2023 reporting deadline for calendar year 2022 FWS earnings)
(GENERAL-23-40) SAIG Software Upgrade for FTI Data Transmission – Preliminary Information for SAIG Software Users	<NEW> Enroll for a new FTI-SAIG mailbox, sign an updated SAIG enrollment agreement, and install upgraded SAIG software in order to continue receiving ISIR data with Federal Taxpayer Information (FTI)	ASAP after ED makes software available (anticipated Fall, 2023) and before beginning to import 2024-25 ISIR data (anticipated December, 2023)
(GENERAL-23-40) SAIG Software Upgrade for FTI Data Transmission – Preliminary Information for SAIG Software Users	<NEW> Install new EdConnect, TDClient, and TDCCommunityManager software	ASAP after ED makes software available (anticipated Fall, 2023) and before beginning to import 2024-25 ISIR data (anticipated December, 2023)
2024–25 FAFSA® Specifications Guide: Volume 7 – Comment Codes	<NEW> Re-code systems to reflect ISIR comment code numbering changes	ASAP before December when FAFSA opens

Create Solutions for Data No Longer Available from the FAFSA

<NEW> Decide how to collect student housing choice when this question is removed from the 2024-25 FAFSA

ASAP

Decide how to collect parental income information for independent students when this question is removed from the 2024-25 FAFSA for Health Resources and Services Administration (HRSA) and/or institutional aid programs

ASAP

Engage Campus Stakeholders

Financial aid budget decision makers (to ensure any newly identified budget needs are accounted for)

After completing steps in “Estimate Institutional Budget Impact of FAFSA Simplification Provisions” section

Enrollment Management Team and 3rd Party Vendor(s) (to determine leveraging and monitor impacts on institutional aid budget, discount rate and headcount priorities)

ASAP

[\(GENERAL-23-34\) Access and Use of Federal Tax Information \(FTI\) for Federal Student Aid Programs Beginning with the 2024-25 FAFSA Processing Cycle](#)

Information Technology

ASAP

- To implement campus systems changes necessitated by FAFSA simplification changes, including:
 - <NEW> Website updates
 - <NEW> Developing and implementing information security standards as it pertains to Federal Taxpayer Information (FTI) including maintaining appropriate receipt, handling, marking, and safeguarding of Controlled Unclassified Information (CUI) data since FTI is a subcategory of CUI.
 - <NEW> Establishing appropriate cybersecurity safeguards to ensure the confidentiality and security of student information
 - <NEW> Assisting with compliance on student-level annual FWS earnings reporting

[\(CB-23-13\) Operational Information – Reporting Federal Work-Study Earnings to the COD System Using the Campus-Based XML Schema Version 1.0a](#)

[\(CB-23-13\) Operational Information – Reporting Federal Work-Study Earnings to the COD System Using the Campus-Based XML Schema Version 1.0a](#)

<NEW> Finance/Payroll/Human Resources

- Assisting with compliance on student-level annual FWS earnings reporting

[\(GEN-23-06\)
Unaccompanied
Homeless Youth
Determinations – Update](#)

Other offices that rely on Pell receipt status, EFC, or other FAFSA data for eligibility for programs they oversee:

ASAP

- TRIO program administrators
- Development/advancement to discuss Pell grant/EFC priorities for receipt of institutional aid
- Housing to discuss housing over break based on Pell receipt or SAI
- Food bank/diaper bank to discuss whether Pell receipt or SAI is used to determine eligibility
- Basic needs/Single Stop office to address possibility of changes to numbers of Pell grant recipients and EFCs
- Emergency aid office to discuss Pell grant/EFC priorities for receipt of emergency aid (lower SAIs and more Pell grant recipients may mean need for more emergency aid dollars or refining eligibility criteria for emergency aid)
- Office(s) that have programming for low-income/first generation students that conditions eligibility on Pell receipt status/EFC
- Admissions to discuss current or future outreach to Pell eligible or low EFC students
- Unaccompanied youth/homeless liaison to discuss changes to unaccompanied/homeless youth documentation changes

[\(GENERAL-23-34\) Access
and Use of Federal Tax
Information \(FTI\) for Federal
Student Aid Programs
Beginning with the 2024-25
FAFSA Processing Cycle](#)

<NEW> Other offices/entities that rely on FAFSA data that is now considered Federal Taxpayer Information (FTI) to ensure they are aware of FTI data use and sharing limitations. This includes but is not limited to Institutional Research and data-sharing agreements (DSAs) and non-disclosure agreements (NDAs) between the research community and institutions of higher education for purposes of research that include de-identified and identifiable FAFSA data to ensure current and future DSAs and NDAs are consistent with Department's [Guidance on the Use of Financial Aid Information for Program Evaluation and Research](#) and its interpretation of Section 483 of HEA.

ASAP

Engage External Stakeholders

Financial aid software providers (FAMs) to ensure preparation for FAFSA Simplification Act provisions

ASAP

State scholarship agencies to discuss changes to student eligibility as a result of FAFSA Simplification Act provisions

ASAP

Scholarship partners to discuss changes to student eligibility as a result of FAFSA Simplification Act provisions

ASAP

Promise programs to discuss changes to student eligibility as a result of FAFSA Simplification Act provisions

ASAP

Update Policies and Procedure

NASFAA P&P Builder	Update P&P manual for changes to:	
	<ul style="list-style-type: none"> Treatment of more than one in student enrolled in college 	ASAP
	<ul style="list-style-type: none"> Treatment of small businesses/family farms 	ASAP
	<ul style="list-style-type: none"> Awarding parameters for new definition of other financial aid and exclusions from that definition, like emergency aid 	ASAP
	<ul style="list-style-type: none"> Replacing lost Pell grants with institutional dollars 	ASAP
	<ul style="list-style-type: none"> Replacing lost state grants with institutional dollars 	ASAP
	<ul style="list-style-type: none"> Converting negative SAI to zero for awarding purposes 	ASAP
	<ul style="list-style-type: none"> 2024-25 verification changes 	ASAP
	<ul style="list-style-type: none"> Accounting for no SAI proration for periods of enrollment other than 9 months 	ASAP
	<ul style="list-style-type: none"> Data use/sharing 	ASAP
	<ul style="list-style-type: none"> SEOG awarding guidelines 	ASAP
	<ul style="list-style-type: none"> COA <ul style="list-style-type: none"> Cost of first professional credential no longer limited to one-time Computer cost for < ½ time students 	ASAP if not already done since these provisions became effective for the 2023-24 award year
	<ul style="list-style-type: none"> PJ/dependency overrides <ul style="list-style-type: none"> Remove policy of denying all PJ requests if you have one Provisional independent student status New criteria that are considered special circumstances meriting a dependency override Decide if want to adopt policy of setting income to zero w/ documentation of unemployment benefits during periods of disaster, emergency, or economic downturn Reviewing comment code 040 to determine whether to add back foreign income exclusion to remove Pell eligibility 	ASAP if not already done since these provisions became effective for the 2023-24 award year
	<ul style="list-style-type: none"> Expanded list of acceptable documentation for unaccompanied/homeless youth 	ASAP if not already done since these provisions became effective for the 2023-24 award year
	<ul style="list-style-type: none"> Carrying forward dependency status override from one year to the next 	ASAP if not already done since these provisions became effective for the 2023-24 award year
(GENERAL-23-63) Key Terms, Definitions, and Systems Related to FAFSA Simplification and FUTURE Acts	<ul style="list-style-type: none"> Terms, definitions, and systems related to FAFSA simplification and the FUTURE Act 	

Communications/Outreach

Update financial aid night materials (such as determining which parent's data to report on FAFSA, how to determine household size)	ASAP
Update website/written materials	
<ul style="list-style-type: none"> Remove references to EFC & replace with SAI 	ASAP
<ul style="list-style-type: none"> Publicize availability of PJ to comply with new statutory requirement 	ASAP if not already done since these provisions became effective for the 2023-24 award year
<ul style="list-style-type: none"> Remove references to any policy of not processing PJ requests to comply with new statutory requirement 	ASAP if not already done since these provisions became effective for the 2023-24 award year
<ul style="list-style-type: none"> Update PJ policies 	ASAP if not already done since these provisions became effective for the 2023-24 award year
<ul style="list-style-type: none"> Update Year Round Pell information to reflect that students no longer have to be enrolled at least half-time in the term they receive the additional Pell grant 	ASAP
<ul style="list-style-type: none"> Update Pell proration information 	ASAP
<ul style="list-style-type: none"> Update information on how to determine who is the student's parent on the FAFSA 	ASAP
<ul style="list-style-type: none"> Update information on how to determine family size 	ASAP
<ul style="list-style-type: none"> List all COA components on all websites that list costs to comply with new statutory requirement 	ASAP if not already done since these provisions became effective for the 2023-24 award year
<ul style="list-style-type: none"> Remove references to requirement to register with Selective Service System, SULA, and drug conviction eligibility restriction 	ASAP
Conduct preemptive outreach to students who could be negatively impacted by FAFSA Simplification Act changes (such as those with > 1 family member in college, small business and farm owners); note whether any institutional decisions to grandfather eligibility might mitigate impacts	ASAP
Update Net Price Calculator to incorporate changes to Pell grant eligibility formula and EFC (SAI)	At the time you normally update the NPC for the next award year
(GENERAL-23-63) Key Terms, Definitions, and Systems Related to FAFSA Simplification and FUTURE Acts	Update terminology and definitions to match changes resulting from FAFSA simplification and the FUTURE Act
	ASAP

Training

[NASFAA FAFSA Simplification web center](#)

Train staff on provisions of FAFSA Simplification Act

ASAP

[ED training materials](#)

Train staff on institutional P&P changes

Before 2024-25 application cycle begins

Remove references to October 1 FAFSA release date

The National Association of Student Financial Aid Administrators (NASFAA) provides professional development for financial aid administrators; advocates for public policies that increase student access and success; serves as a forum on student financial aid issues; and is committed to diversity throughout all activities.

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