



U.S. Department of Education
Office of Inspector General

FSA's Plan for Soliciting and Incorporating Stakeholders' Feedback in the 2025–2026 FAFSA Process

April 17, 2025
ED-OIG/F24GA0208

FLASH REPORT

NOTICE

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. The appropriate Department of Education officials will determine what corrective actions should be taken.

In accordance with Freedom of Information Act (Title 5, United States Code, Section 552), reports that the Office of Inspector General issues are available to members of the press and general public to the extent information they contain is not subject to exemptions in the Act.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Audit Services

April 17, 2025

TO: James Bergeron
Acting Chief Operating Officer, Federal Student Aid

FROM: Sean Dawson /s/
Assistant Inspector General for Audit

SUBJECT: Final Flash Report, "FSA's Plan for Soliciting and Incorporating Stakeholders' Feedback in the 2025-2026 FAFSA Process," Control Number ED-OIG/F24GA0208

Attached is the subject final report that consolidates the results of our review of FSA's Plan for Soliciting and Incorporating Stakeholders' Feedback in the 2025–2026 FAFSA. We have provided an electronic copy to your audit liaison officer. We received your comments agreeing with the recommendations in our draft report.

U.S. Department of Education policy requires that you submit a corrective action plan within 30 days of the issuance of this report. The corrective action plan should set forth the specific action items and targeted completion dates necessary to implement final corrective actions on the findings and recommendations contained in this final report. Corrective actions that your office proposes and implements will be monitored and tracked through the Department's Audit Accountability and Resolution Tracking System.

In accordance with the Inspector General Act of 1978, as amended, the Office of Inspector General is required to report to Congress twice a year on recommendations that have not been completed after 6 months from the date of issuance.

We appreciate your cooperation during this review. If you have any questions, please contact me at (202) 987-0173 or Sean.Dawson@ed.gov.

Attachment

Results in Brief

FSA's Plan for Soliciting and Incorporating Stakeholders' Feedback in the 2025–2026 FAFSA Process



Why the OIG Performed this Work

Federal Student Aid (FSA) processes more than 17.6 million Free Application for Federal Student Aid (FAFSA) forms each year to help students pay for college and provide students with approximately \$120.8 billion in grant, work-study, and loan funds. The FAFSA Simplification Act of 2021 required FSA to overhaul its systems and processes to implement a streamlined 2024–2025 FAFSA process.

FSA's launch of the 2024–2025 FAFSA was plagued by multiple system implementation issues that prevented students and families from successfully applying for financial aid within critical timeframes. As a result, FSA developed actions to improve the 2025–2026 FAFSA process and increase transparency and communication.

The objective of our review was to describe FSA's plans to solicit, analyze, and incorporate feedback from students, families, institutions of higher education, and other stakeholders for the completion, submission, and processing of the 2025–2026 FAFSA.

To achieve our objective, we interviewed U.S. Department of Education (Department) officials from the offices of the Under Secretary and FSA and reviewed documentation supporting FSA's actions to improve the FAFSA process by incorporating the feedback received.

What did the OIG Find?

We found that although FSA did not have a formal plan with specific details about how it would solicit, analyze, and incorporate the feedback it received regarding the completion, submission, and processing of the 2025–2026 FAFSA, FSA and the Department established multiple channels of communication for receiving feedback. On November 14, 2024, FSA announced that since the start of beta testing on October 1, 2024, more than 14,000 students successfully submitted their 2025–2026 FAFSAs and that the Department had successfully processed their applications, sending over 81,000 records to more than 1,850 schools and 43 States.

What Is the Impact?

The positive practices FSA implemented to improve the 2025–2026 FAFSA process were reflected when on November 18, 2024, FSA was able to make the 2025–2026 FAFSA available online for all students to apply for financial aid, ahead of the originally scheduled date of December 1, 2024. As of January 30, 2025, 5.8 million students have submitted a 2025–2026 FAFSA.

What Are the Next Steps?

We recommended that FSA continue to solicit, analyze, and incorporate feedback regarding the completion, submission, and processing of the 2025–2026 FAFSA until FSA confirms that issues with the FAFSA process have been resolved, and ensure that when the FAFSA process undergoes significant revisions in subsequent award years, FSA use the positive practices it implemented for soliciting and incorporating feedback in the 2025–2026 FAFSA process.

FSA agreed with our recommendations. FSA stated that it will maintain active feedback channels with students, families, schools, and partners, including the use of surveys, issue tracking, and stakeholder engagement meetings until they are confident that any remaining issues with the 2025–2026 FAFSA process have been resolved. FSA also stated that they are committed to using and formalizing the effective practices from the 2025–2026 FAFSA cycle in all future process revisions.

We summarized FSA's comments at the end of the recommendations and provided the full text of the comments at the end of the report ([see FSA's Comments](#)).

Purpose

The objective of our flash review was to describe Federal Student Aid's (FSA) plans to solicit and incorporate feedback from students, families, institutions of higher education (IHE), and other stakeholders¹ for the completion, submission, and processing of the 2025–2026 Free Application for Federal Student Aid (FAFSA).

Streamlined FAFSA

On December 27, 2020, the FAFSA Simplification Act was enacted into law as part of the Consolidated Appropriations Act of 2021 (Public Law 116-260).² The FAFSA Simplification Act required changes to the FAFSA to reduce administrative and informational burdens on applicants and their families. FSA's launch of the streamlined 2024–2025 FAFSA was plagued by multiple system implementation issues that prevented students and families from successfully applying for financial aid within the critical timeframes needed by the IHEs they planned to attend. As a result, FSA devised actions that were intended to improve the 2025–2026 FAFSA process and increase transparency and communication regarding its efforts to improve the FAFSA functionality and the progress achieved. Those actions included soliciting, collecting, and analyzing feedback from students, families, IHEs, and other stakeholders regarding the use of the 2025–2026 FAFSA, and incorporating the feedback to improve the FAFSA experience.

What We Did

We interviewed U.S. Department of Education (Department) officials from the offices of the Under Secretary and FSA³ to gain an understanding of FSA's plan to solicit, collect, and analyze feedback from students, families, IHEs, and other stakeholders regarding the use of the 2025–2026 FAFSA, including how FSA would incorporate the feedback received for the successful completion, submission, and processing of the 2025–2026 FAFSA. We also reviewed documentation supporting that FSA communicated with

¹ Other stakeholders include community-based organizations, high schools, States, limited groups of students, and contributors, including internal Department and FSA stakeholders.

² The Consolidated Appropriations Act 2022 (Public Law 117-103) extended the deadlines for implementing certain provisions in the FAFSA Simplification Act.

³ See the Scope and Methodology section for a list of FSA groups we interviewed.

stakeholders and collected, analyzed, and incorporated their feedback to improve the 2025–2026 FAFSA process.

What We Found

FSA did not have a formal plan regarding the processes it would use to solicit, analyze, and incorporate the feedback it received regarding the completion, submission, and processing of the 2025–2026 FAFSA. However, FSA and the Department established multiple channels of communication to receive feedback and incorporate it into the FAFSA process. This included the use of usability and beta testing, partner meetings,⁴ listening sessions,⁵ and a request for information published in the Federal Register. In addition, through surveys, FSA obtained feedback from approximately 10 percent of users who completed a 2025–2026 FAFSA beginning with beta testing on October 1, 2024, and continuing with submissions after the testing phase was completed.

Some of the related processes were documented, including data collection processes from usability and beta testing and partner meetings. FSA analyzed the feedback data to identify the necessary changes and provided related instructions to the contractors responsible for implementing the changes. In September 2024, FSA implemented a process to manage and track issues, regarding the completion, submission, and processing of the 2025–2026 FAFSA, and as of December 19, 2024, FSA reported that it had resolved and closed 218 of the 317 issues recorded through this new process.

On November 14, 2024, FSA announced that since the start of beta testing on October 1, 2024, more than 14,000 students have successfully completed and submitted their 2025–2026 FAFSAs and that the Department had successfully processed the applications, sending over 81,000 records to more than 1,850 schools and 43 States, which receive the FAFSAs to award State-based financial assistance for postsecondary education. On November 18, 2024, FSA made the 2025–2026 FAFSA available online for all students to apply for financial aid, and as of January 30, 2025, 5.8 million students have applied.

⁴ Principals, superintendents, and counselors that work in secondary education schools; advocates; IHEs; community-based organizations; States; and FSA vendors and contractors are considered partners.

⁵ Listening sessions were held with students, parents, school counselors, principals, superintendents, IHEs, financial aid administrators, college access organizations, nonprofits, community-based organizations, State agencies, and priority populations that included students with mixed status families, homeless youth, non-tax filers from territories, and students without social security numbers.

Usability and Beta Testing

FSA developed documented processes for conducting usability and beta testing of the 2025–2026 FAFSA and related help guides. Usability testing assesses how easily and effectively people can use a product or system, while having a positive experience. Beta testing provides a limited number of users access to an early release of a technology product to ensure that the product works as expected when it is fully released. The testing allowed FSA to collect and analyze testing participant feedback and track the status of issues identified for correction or improvement. For usability testing, FSA recommended over 42 actions for the contractor to perform, addressing approximately 44 issues identified and documented during usability testing. As of December 17, 2024, FSA reported that 18 of the 42 recommended actions were completed, 15 are on the backlog for future improvements,⁶ and 9 have had no action taken. For beta testing, through December 19, 2024, the FAFSA Issues Intake and Triage (FAFSA Issues) team⁷ tracked 317 FAFSA issues that were identified.⁸ As of December 19, 2024, the consolidated tracker spreadsheet showed that 218 of the 317 issues identified were resolved while 99 were still being addressed.

Usability Testing

FSA conducted 2 rounds of usability testing in May 2024, using 16 participants (8 in each round), and 2 rounds in August 2024, using 14 participants (6 in the first round and 8 in the second round) to identify where issues may occur during the FAFSA process. To recruit participants, FSA used a recruitment tool that was populated with over 100,000 possible participants. FSA provided questionnaires to the possible participants to identify those meeting FSA’s sampling criteria (such as specific demographics), and then selected a random sample of them. Usability testing was conducted as part of FSA’s ongoing user experience and system design practices, where critical issues are given

⁶ The backlog for future improvements includes a list of issues that, if fixed, will improve the FAFSA application process; however, the contractor is not contractually required to fix them. When a new issue is identified, FSA reviews it and determines whether the contractor is required to fix it or whether it is something FSA wants to fix to improve the applicants’ experience in completing the FAFSA. If the issue will improve the FAFSA application process, it is placed on the backlog.

⁷ The FAFSA Issues team was created to have a centralized location for tracking feedback-related questions and responses, and production issues related to the FAFSA process.

⁸ The FAFSA Issues team used an Excel spreadsheet to consolidate and track the issues identified by FSA staff during beta testing. The FAFSA Issues team reported issues that rose to the level of needing further investigation, which were issues that could prevent users from submitting their FAFSAs.

priority to ensure they are addressed before system applications are released for initial use.

The first round of May 2024 usability testing involved FSA analyzing one-on-one sessions held with eight students and their parents as they prepared to complete the 2025–2026 FAFSA and edited the 2024–2025 FAFSA. Testing participants provided feedback to FSA about applicants’ use of the function that helps identify contributors⁹ that are required to provide financial information on the applicant’s FAFSA, locating the correct link to accept the 2025–2026 FAFSA invitation, and users’ ability to start the 2025–2026 FAFSA and edit the 2024–2025 FAFSA.

For the second round of May 2024 usability testing, FSA tested FAFSA updates using a live prototype for filling out specific areas of the FAFSA and verifying the submission status as “in progress” for an applicant’s unfinished FAFSA. During the testing, eight participating students and their parents provided feedback related to their ability to complete, submit, and make online corrections to the 2025–2026 FAFSA. They identified areas for improvement including (1) the function used to determine whether parental information is required—specifically, the applicants felt this function was confusing when they had traditional parent circumstances and assumed the function would send their parents the invitation needed to complete the parental information on the FAFSA; and (2) the process for editing a 2024–2025 FAFSA—specifically, the applicants felt the editing process was difficult to navigate; and (3) the college search function—specifically, the applicants thought that by typing in the school name, the search would be performed without clicking the search button. From both rounds of May 2024 testing, FSA recommended a total of 29 actions to address 27 issues.

The first round of August 2024 usability testing focused on the changes FSA made to the messages that the FAFSA system sends to applicants and their parents about Federal taxpayer information (FTI) imported from the Internal Revenue Service (IRS)¹⁰ that was used to determine the applicant’s Student Aid Index (SAI)¹¹ and Federal Pell Grant

⁹ A contributor is anyone (student, student’s spouse, student’s biological or adoptive parent, or student’s parent’s spouse) who is required to provide information on the FAFSA, sign the FAFSA, and provide consent and approval to have their Federal tax information transferred directly from the IRS into the form.

¹⁰ To be eligible for Federal aid, applicants must consent to allow the IRS to import their Federal tax return information directly from the IRS.

¹¹ SAI is a number calculated using financial and family information input from an applicant’s FAFSA. It replaces the Expected Family Contribution or EFC.

eligibility. These changes were the result of FSA’s identification of high priority issues that needed to be addressed for the 2025–2026 FAFSA. The six participants FSA selected for this testing represented diversity in geographic location, age, gender, and other socio-economic factors. Some of the participant feedback FSA received regarding the FTI-related messages identified the need for the messages (1) to be more detailed, (2) to state the exact reason why the applicant’s FTI data was not received,¹² (3) to provide clear instructions about what to do when their FTI data was not received from the IRS, and (4) to provide a better understanding of where the FTI data came from.

The second round of August 2024 usability testing focused on the online Help Center and Frequently Asked Questions (FAQ) sections of the FAFSA website. FSA observed eight participants as they navigated the online FAFSA Help Center, FAFSA Help Center category pages,¹³ and FAQ. Some of the participant feedback FSA received included (1) feeling overwhelmed by the layout of the Help Center due to lengthy lists of articles that were not well organized and (2) preferring the FAQ to be in an accordion¹⁴ format instead of a linked button¹⁵ format. From both rounds of August 2024 testing, FSA recommended 5 actions for the contractor to perform to address 4 issues pertaining to the FTI-related messages and 8 actions to address 13 issues related to the online Help Center and FAQ sections of the FAFSA website.

Beta Testing

FSA conducted four phases of beta testing from October 1, 2024, through November 20, 2024, to identify student and parent frustrations, system errors, and other issues related to the 2025–2026 FAFSA process. The testing involved students and parents completing the online 2025–2026 FAFSA, some of which FSA observed in person so that it could record and analyze feedback in real time. Other means of participant feedback came from intake submission forms and survey software.

¹² The applicant would get an “information not received” message when FTI data was not successfully imported from the IRS to FAFSA.

¹³ The online FAFSA Help Center contains sections or “category pages” within the online site on “How To Start a New FAFSA,” “Contributor Information (Parent and Spouse),” and “Financial Information, How to Sign and Submit.”

¹⁴ An accordion formatted list refers to a vertically stacked set of interactive headings from which the user can select a topic.

¹⁵ To access the links, the participant must click an oval-shaped button.

FSA issued electronic announcements on its “Knowledge Center” website explaining how individuals could participate in FAFSA beta testing. FSA also sought community-based organizations (CBO), high schools, school districts, State and county organizations, and IHEs to submit an interest to participate in beta testing. FSA used an Office of Management and Budget approved questionnaire, a software recruiting tool, and CBOs to recruit the participants.

- The first phase of testing began on October 1, 2024, and included more than 650 students.
- The second phase of testing began on October 15, 2024, and included more than 3,500 additional students.
- The third phase of testing began on November 1, 2024, and included more than 25,000 students.
- The fourth and final phase of testing began on November 13, 2024, and included more than 50,000 students.

As participants worked through the 2025–2026 FAFSA, they received automatic online survey notices.¹⁶ Specifically, participants received one survey after they completed the FAFSA¹⁷ and another survey after an interaction with customer service. The survey software scored the surveys, and an FSA Customer Analytics Group data analyst or contractor collected the scores and sent them to the Product Management Group’s¹⁸ FAFSA team or to the FAFSA Issues team. According to the FAFSA Issues team lead, they went into the survey software, downloaded all the feedback from the beta testing surveys, and added it to the consolidated spreadsheet to track, analyze, and conduct more research on it before ultimately ensuring the contractor corrected the issues. In addition, the results of the online surveys were monitored by taking the following steps.

- Weekly: Every Monday, the contractor sent a report to the FAFSA team outlining the FAFSA survey scores and comment analysis.

¹⁶ FSA used survey software to capture, analyze, and manage survey feedback received from customers about their FAFSA experiences.

¹⁷ FSA received 120,763 survey submissions from applicants after completing the 2025–2026 FAFSA between October 1, 2024, and January 6, 2025.

¹⁸ The Product Management Group’s FAFSA team worked closely with the FAFSA product owner with front-end decision making for the FAFSA. The FAFSA team received the information directly before the FAFSA Issues team was formed.

- Monthly: The contractor compiled a list of user recommendations using the feedback included in the weekly comment analysis and shared with the FSA Product Management Group’s design team.¹⁹
- Quarterly: The contractor conducted an in-depth analysis of FAFSA post-transaction responses and provided a summary of issues, scores, and feedback themes to the Customer Analytics Group for further analysis.

The FAFSA Issues team also collected and analyzed feedback from observations made by internal stakeholders²⁰ about issues identified during live beta testing events. Internal stakeholders reported specific issues by emailing an intake submission form to a central inbox. The FAFSA Issues team reviewed the inbox, added the issues to the consolidated tracker, and checked whether they were previously addressed. For previously resolved issues, they provided the necessary information to the requestor. For unresolved issues, the FAFSA Issues team sent requests²¹ to the related FSA team and tracked their progress until resolution. Once resolved, issues were moved to a closed folder and marked as closed in the tracker.

Some of the beta testing participant feedback that FSA received through observation, intake submission forms, and survey software includes issues participants had with accessing and completing the FAFSA,²² adding a specific college to the FAFSA, an error message appearing in a link to Pell grant information that participants received in an email confirmation after submitting the FAFSA, and the incorrect number of dependents displaying on the review page at the end of the FAFSA. To address some of the feedback, FSA officials corrected the issue that caused the problem with adding a specific college to the FAFSA. The issue regarding the error message in a link to Pell Grant information is still being researched and, as of November 25, 2025, is unresolved. The issue regarding the incorrect number of dependents displaying on the review page

¹⁹ FSA Product Management Group’s design team has responsibilities for most student-parent and borrower-facing products on <https://studentaid.gov>. The team contributes to the design of how the FAFSA application works and how users interact with the form.

²⁰ Internal stakeholders include Department and FSA employees.

²¹ FSA creates requests to provide contractors with the changes that they need to implement.

²² Some participants experienced issues logging in (they were unable to log in initially or log back in after logging out or experienced a delay in receiving a texted access code and were locked out for 30 minutes after performing a password reset) and others experienced issues with FAFSA web pages (trouble with loading and advancing through form pages, pages not advancing after adding colleges, or incorrect school codes populating fields).

is also unresolved as of November 25, 2024, but has been added to the FAFSA backlog for future improvements.

Partner Meetings

Another channel of communication FSA and the Department established to solicit and receive feedback from stakeholders was through communication with its partners. The FAFSA Outreach and Engagement team established a framework of routine collaborative meetings (occurring twice weekly) that included Department staff and FSA's partner network staff. These meetings assessed external feedback and identified approaches for subsequent communication with appropriate external partners, who in turn shared information with students and families. These partners included principals, superintendents, and counselors working in secondary education schools; advocates;²³ IHEs; CBOs; States; and FSA vendors and contractors.

The purpose of the collaborative meetings was to discuss the strategy for communications to the partners regarding the 2025–2026 FAFSA process. This included a cycle of developing messages for its partners, identifying communications strategies, and considering feedback received. The FSA Outreach and Engagement team used a FAFSA partner outreach tracker document to collect, organize, and track feedback coming in from various stakeholders outside FSA, funneling responses to the appropriate audience and stakeholder groups,²⁴ providing information about FAFSA operations and implementation work at FSA, and aligning core messaging to share with external stakeholders.

According to a Strategy Advisor from the Department's Office of the Undersecretary, items in the partner outreach tracker were discussed and updated, and then at the partner meetings a determination was made on the audience that needs to receive the information and notifications. Messages to the partners included information about financial aid, the status of beta testing, progress on FAFSA improvements, and delays related to paper FAFSA form processing. In addition, the team discussed any specific questions received from the stakeholder groups and determined whether (1) the FAFSA

²³ The FAFSA Outreach and Engagement team defines the advocates as the FAFSA Coalition, college access-focused organizations, CBO nonprofits, and think tanks. The FAFSA Coalition includes key groups from 14 different stakeholders' communities such as the Council for Opportunity in Education and the National Council for Community and Education Partnerships.

²⁴ The key audience and stakeholders' groups included students and families; secondary school superintendents, principals, and counselors; advocates; IHEs; CBOs; States; vendors; and the FAFSA Coalition.

Outreach and Engagement team could answer the question, (2) the question would be referred to the FAFSA subject matter experts, or (3) the question would be escalated to FSA leadership for resolution.²⁵ For questions that required subject matter expert resolution, the FAFSA Outreach and Engagement team created a request and sent it to the appropriate team and updated the FAFSA partner outreach tracker with the staff member responsible for answering the request and the closure date. When the FAFSA Outreach and Engagement team received the information requested, they updated the partner outreach tracker with the response received.

Summer Listening Sessions

The Department established a channel of communication in collaboration with FSA to receive feedback from stakeholders through summer listening sessions. From June through August 2024, they held 47 Summer Tour Listening Sessions with over 300 entities. The participants included students and parents, counselors, principals, superintendents, IHEs, CBOs, financial aid administrators, and State agencies. The sessions focused on hearing about people's experiences with the completion and submission of the 2024–2025 FAFSA and on providing information about planned improvements for the 2025–2026 FAFSA with the limitation that the core functionality²⁶ and processing would remain the same. The team²⁷ collecting the feedback from the listening sessions logged and tracked the feedback in an Excel spreadsheet and held daily meetings to discuss the information as it was gathered and to share it with FSA leadership. The most dominant trend among stakeholders during the listening sessions was the request for increased transparency about launch dates, errors, such as matching students with contributors and matching social security numbers with names, detailed progress reports about technology releases,²⁸ improvements to the call center, and the need for early and predictable timelines from the Department.

²⁵ FSA leadership includes Acting Chief Operating Officer and Assistant Deputy Chief Operating Officer.

²⁶ According to FSA's Chief of Staff Strategy Advisor, core functionality refers to the FAFSA's information technology processes for students and families to complete and submit Federal student aid such as the function to receive IRS FTI data.

²⁷ The team from the listening sessions were staff from the Office of the Secretary, Office of the Under Secretary, Office of the Deputy Secretary, Office of Communications and Outreach, Office of Postsecondary Education, Office of Legislation and Congressional Affairs, and FSA.

²⁸ Technology releases included information made available to the public by email, social media posts, and webinars.

Also, during the period listening sessions were being held, the Department and FSA set up weekly and monthly outreach meetings to disseminate listening session feedback and create a proactive engagement strategy between FSA and all FAFSA stakeholders for the 2025–2026 cycle. FSA planned to use the feedback from the outreach meetings to incorporate changes into the 2025–2026 FAFSA process. Feedback was categorized into the areas related to

- FAFSA Operations (for any changes to the text in the FAFSA and institutional policy guidance questions), FAFSA support resources and materials, and FAFSA constituents and the partnership engagement meetings for 2025–2026.
- FAFSA support resources and materials, and
- FAFSA constituents and the partnership engagement meetings for 2025–2026.

Request for Information

The Department posted a request for information (RFI) in the Federal Register (89 FR 66094, August 14, 2024) to solicit feedback on ways to improve the 2025–2026 FAFSA and the development of supporting materials. The Department also sought feedback on ways to provide additional support to ensure that applicants and contributors complete the FAFSA and that IHEs and States have the support needed to process and package student aid. As of November 14, 2024, the Department had received 71 responses. Of these, 51 responses were from organizations such as schools, member associations, and advocacy groups while the remainder were feedback from individuals (generally financial aid administrators). FSA evaluated the feedback and determined whether it pertained to an issue that must be fixed, an improvement, or something that was written in the law and required congressional approval to change. If the FSA Engagement and Policy team determined that a statutory change needed to be made based on the feedback received, the Department would solicit Congress to amend the statute and make the change. For other changes, the FSA team worked directly with the technology team and contractors to make the changes or update the backlog for future improvements to the 2025–2026 FAFSA or process.

According to FSA’s Director of Policy Implementation and Oversight, most of the feedback obtained through the RFI were issues they were aware of and had worked to correct since the launch of the 2024–2025 FAFSA. According to the FAFSA Program Executive Director, most of the RFI feedback suggestions are backlogged because they are considered improvements, and the technology teams are focusing on correcting the issues encountered for the launch of the 2025–2026 FAFSA. However, the Director of Policy Implementation and Oversight stated that nothing was flagged as an issue from the feedback received that has not already been addressed. After the feedback was evaluated, it was with the appropriate staff and contractors responsible for

implementing the changes depending on which category the change pertains to. The Director of Policy Implementation and Oversight also stated that she attended daily meetings with the Chief Operating Officer and the Under Secretary to provide status updates on the FAFSA process from late summer 2024 through the beta testing in October 2024.

Principle 13 of the Government Accountability Office's *Standards for Internal Control in the Federal Government* (September 2014) states that "management should design processes that use the entity's objectives and related risks to identify the information requirements needed to achieve the objectives and address the risks. Information requirements consider the expectations of both internal and external users." In addition, management obtains timely and relevant data from reliable internal and external sources based on identified information requirements. Principle 14 states that management should internally communicate the necessary quality information throughout the entity to achieve objectives. In addition, Principle 15 states that management communicates with, and obtains quality information from, external parties using established, open two-way external reporting lines. External parties include contractors, service organizations, government entities, and the public, among others. Lastly, Principle 15 states that management communicates quality information externally so that external parties can help the entity achieve its objectives and address related risks.

What We Recommend

We recommend the official Acting Chief Operating Officer for FSA—

1. Continue to solicit, analyze, and incorporate feedback regarding the completion, submission, and processing of the 2025–2026 FAFSA until FSA confirms that issues with the FAFSA process have been resolved.
2. Ensure that when the FAFSA process undergoes significant revisions in subsequent award years, FSA use the positive practices it implemented for soliciting and incorporating feedback in the 2025–2026 FAFSA process.

FSA's Comments

FSA agreed with our recommendations. In its response to Recommendation 1, FSA stated that it will maintain active feedback channels, including surveys, issue tracking, and stakeholder engagement meetings until they are confident that any remaining issues with the 2025–2026 FAFSA process have been resolved. Regarding Recommendation 2, FSA stated it is committed to using and formalizing the effective practices from the 2025–2026 cycle in all future FAFSA process revisions, recognizing the value of early engagement, real-time feedback, and transparency.

OIG Response

FSA's proposed actions, if planned and implemented appropriately, are generally responsive to our recommendations.

Scope and Methodology

Our initial review covered FSA's plans to solicit and incorporate feedback from students, families, IHEs, and other stakeholders²⁹ for the completion, submission, and processing of the 2025–2026 FAFSA from June 14, 2024, through September 30, 2024. However, the review period was expanded to May 1, 2024, through October 15, 2024, to include the plan for the first round of May usability testing and the results of the first round of beta testing in October. To determine FSA's plans to solicit and incorporate the feedback received, we interviewed Department officials from the Office of the Under Secretary and FSA officials from the Offices of Student Experience and Aid Delivery and Partner Participation and Oversight, which included officials from the Program Leadership and individuals from the Product, Technology, Engagement and Policy, and Support teams responsible for FAFSA implementation. We also interviewed FSA's FAFSA Executive Advisor and Information Technology Program Manager. In addition, we reviewed documentation to support the testimonial evidence provided. We did not conduct data testing to form an opinion on whether FSA's plans were adequate for a successful launch and processing of the 2025–2026 FAFSA. Therefore, we did not develop a sampling methodology. We also did not rely on computer-processed data during this review.

Compliance with Standards

We conducted our work in accordance with OIG quality control standards and the Council of the Inspectors General on Integrity and Efficiency (CIGIE) "Quality Standards for Federal Offices of Inspector General," which require that we conduct our work with integrity, objectivity, and independence. We believe that the information obtained provides a reasonable basis our conclusions.

²⁹ Other stakeholders include CBOs, high schools, States, limited groups of students, and contributors, including internal Department and FSA stakeholders.

Appendix A. Acronyms and Abbreviations

CBO	community-based organization
Department	U.S. Department of Education
FAFSA	Free Application for Federal Student Aid
FAQ	frequently asked questions
FAFSA Issues	FAFSA Issues Intake and Triage
FSA	Federal Student Aid
FTI	Federal taxpayer information
IHE	institution of higher education
IRS	Internal Revenue Service
RFI	request for information
SAI	student aid index

FSA's Comments



March 31, 2025

TO: Mr. Juan Santiago
Assistant Director of the Elementary and Secondary Education Oversight Team
Office of Inspector General
U.S. Department of Education

Mr. Jeffrey Nekrasz
Senior Advisor
Office of Inspector General
U.S. Department of Education

FROM: Phillip Juengst
Deputy Chief Operating Officer
Office of Federal Student Aid

SUBJECT: Draft Flash Report, *FSA's Plan for Soliciting and Incorporating Stakeholders' Feedback in the 2025-2026 FAFSA Process*, Control Number ED- OIG/F24GA0208

Thank you for the opportunity to review and respond to the draft flash report. We appreciate the Office of Inspector General's thoughtful analysis of Federal Student Aid's efforts to solicit, analyze, and incorporate stakeholder feedback in preparation for the 2025–2026 FAFSA cycle. We accept the report's findings and agree with both recommendations. While we acknowledge that FSA did not implement a single formal plan for feedback incorporation, we are proud of the multiple channels and coordinated processes we established to hear directly from students, families, schools, and partners. These efforts were integral to launching the 2025–2026 FAFSA ahead of schedule and improving user experience.

In response to the recommendations:

1. **Continued Feedback Loop:** We will maintain active feedback channels, including surveys, issue tracking, and stakeholder engagement meetings, until we are confident that any remaining issues with the 2025–2026 FAFSA have been resolved.
2. **Institutionalizing Positive Practices:** We are committed to using and formalizing the effective practices from this cycle in all future revisions of the FAFSA process. We recognize the value of early engagement, real-time feedback, and transparency.

We are grateful for the collaborative spirit of this review and look forward to working with your office to continue improving the FAFSA experience for all students and families.

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

Federal Student Aid | [StudentAid.gov](https://studentaid.gov)
830 First St. NE, Washington, DC 20002

Sincerely,



Phillip Juengst
Deputy Chief Operating Officer
Office of Federal Student Aid

Page 2