



# WASFAA

Western Association of Student Financial Aid Administrators

April 21, 2017

Dear Secretary DeVos:

The Western Association of Student Financial Aid Administrators (WASFAA) is an organization that represents postsecondary educational financial aid professionals from Alaska, Arizona, California, Hawaii, Idaho, Nevada, Oregon, Washington and the Pacific Islands. We are writing to express our concern that the IRS Data Retrieval Tool (DRT) will not be available until the next FAFSA cycle which starts October 1, 2017. The IRS DRT is a tool that more than 50% of FAFSA filers have come to depend on and utilize. We realize that it is important to add security updates to protect the identities of taxpayers but in the meantime, we would like to make the following suggestions to make the 2017-2018 processing year more efficient and less stressful for students and families.

- Provide clear direction at FAFSA.gov explaining how the form can be completed without the DRT. We appreciate that the DRT option was disabled within the FAFSA so that students can no longer access the nonfunctioning tool. It was a problem because after misdirection, the student was not able to get back to the FAFSA application to complete the process.
- In place of the DRT information or IRS tax return transcripts, allow signed copies of the federal tax return from applicants to satisfy the verification documentation requirement. The process to obtain an IRS tax return transcript causes a significant delay of 8-10 days to be received by mail.
- Obtaining documentation of non-filing status has been problematic for students and families, and we hope in the future that the IRS DRT can be utilized to document non-filing status. For a temporary solution, we would request that submission of W2 forms and an institutional verification worksheet be acceptable to document non-filing status.
- It would be helpful if the verification selection criteria were revised to provide a more generous tolerance so that the number of students selected for verification remains stable and manageable for institutions and that financial aid processing can continue without interruption. This would fix the anticipated increase in verification selections due to the IRS DRT being unavailable and the one-time implementation problem of the same tax year being utilized on the FAFSA because of Prior-Prior-Year (PPY).

We believe the impact of the outage of the IRS DRT is contributing to a slowdown in the application rate and will affect low-income families the most who are often deterred by the complexity of the process. We would respectfully request consideration of these recommendations to increase institutional flexibility in verifying student and family income during the IRS DRT outage. We appreciate that the Department is working to notify affected applicants who may be affected by the confirmed security breach.

Sincerely,  
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