Everyone loves to hate the Free Application for Federal Student Aid process that opens the doors to student loans and grants, with its multiple questions about family finances.

But among the 20 million annual FAFSA applicants, the process is particularly problematic for six types of aspiring college students and those who need to reapply.
Students whose parents refuse to participate in the process altogether, homeless youth, prisoners, military survivors, undocumented immigrants and children of divorced parents are among them. As Congress weighs its first update to the Higher Education Act in more than a decade, advocates are hopeful that any deal will include a FAFSA streamlining, though whether these students get any relief remains unclear.

The challenges arise not just on the initial application, but later, during the income verification process. About 30 percent of all applicants are flagged to submit additional paperwork because the federal government seeks to avoid improper payments.

HELP Chairman Lamar Alexander (R-Tenn.) has made FAFSA simplification a priority as he works to complete an HEA update yet this year. He’s pushed for shrinking the number of questions from 108 to about two dozen. Alexander also wants to reduce the need for verification by having students’ tax data automatically transfer from the IRS to the Education Department.

"There are not many things U.S. senators can do to cause 20 million American families to say 'thank you,'” Alexander said in March. "We are on the verge of doing one of those things."

Karen McCarthy, director of policy analysis at the National Association of Student Financial Aid Administrators, said generally the proposals under discussion on Capitol Hill are aimed more broadly at improving the process — not changing eligibility requirements.

“It’s at a much more operational level,” McCarthy said.

Still, there’s some legislation that could potentially make a difference.

Presidential candidates Sens. Cory Booker (D-N.J.) and Kirsten Gillibrand (D-N.Y.) are among Senate Democrats behind a bill, S. 1346 (116), for example, that would fast track financial aid to students who already qualify for government assistance.
Another bill filed in the Senate, S. 789 (116), by Sens. Patty Murray (D-Wash.) and Rob Portman (R-Ohio), and in the House, H.R. 1724 (116), by Reps. Katherine Clark (D-Mass.) and Don Young (R-Alaska), is designed to ensure that homeless youth would not have to annually submit paperwork showing they are independent. It would also expand who is eligible to verify that a student is homeless.

Here’s a look at who has the worst struggles with the FAFSA:

**STUDENTS WHOSE PARENTS REFUSE TO DIVULGE INFORMATION:** Students under the age of 24 whose parents decline to fill out the FAFSA are in a tough spot because the law assumes teens and young 20-somethings receive some sort of financial support. Exceptions aren’t typically made unless the applicant qualifies as independent by meeting requirements that include being married or having children.

Those not deemed independent who can’t get paperwork from their parents, because of family conflicts or the parents’ mistrust of the government, can complete the FAFSA process. But they are eligible only for unsubsidized federal student loans and not other federal aid like Pell Grants.

MorraLee Keller, director of technical assistance at the National College Access Network, a nonprofit focused on postsecondary attainment, said this happens just a small percentage of the time, but there are such cases. “When it’s purely a parent refusal, the sad news is that everybody’s hands are tied,” Keller said.

**HOMELESS YOUTH:** Under the law, unaccompanied homeless students can meet the requirement to be considered independent if a school district administrator or shelter official verifies that they are homeless. But it’s not always that simple.

Barbara Duffield, executive director of Schoolhouse Connection, a nonprofit organization that finds educational opportunities for homeless young people, said many don’t stay in shelters for very long and aren’t enrolled in high school. Until they are 24, they must have their status reverified annually to be considered independent.

“We still get a tremendous number of emails and phone calls from youth, from service providers, and from financial aid administrators who are asking for paperwork that youth cannot possibly get, who are still grilling them and asking them questions over and over again, every single year they go to college, which re-traumatizes them, so there’s still a very significant barrier,” Duffield said.

In 2016, GAO auditors said in a report that “financial aid staff are often reluctant to determine that a student is unaccompanied and homeless without making extensive documentation requests, yet homeless youth living in a car or tent can find it difficult to document these tenuous living situations.”
**PRISONERS:** Prisoners are banned from using Pell Grants. In 2015, the Education Department created a pilot program that allows participating prisoners to tap into student aid. But getting inmates through the FAFSA process hasn’t been easy, the GAO said in March.

Many prisoners don’t meet requirements to be considered independent, so they are reliant on their parents to share tax information, said Brian Walsh, the senior program associate in the Center on Sentencing and Corrections at the Vera Institute of Justice, a nonprofit that aims to improve justice systems. Others behind bars have problems qualifying because a previous student loan is in default, Walsh said.

Typically, to receive a Pell Grant, male students must have registered with the Selective Service, but in the pilot’s first year, 15 percent of the FAFSA applicants had not registered, the GAO said.

“Incarcerated applicants were typically unable to be reached via phone or email to answer questions, according to school officials we interviewed, and completing verification paperwork sometimes required multiple trips to the prison, which in some cases was more than an hour away,” the GAO said.

**CHILDREN OF FALLEN TROOPS:** Ashlynne Haycock, deputy director of policy and legislation at the Tragedy Assistance Program for Survivors that provides assistance to the families of fallen troops, said a common complaint among the children of military members who have died is that many are asked to annually submit a parent’s death certificate as part of the FAFSA verification process.

Haycock said her own brother, who recently graduated from college, had to present death certificates for their deceased parents each year he was in school to complete the FAFSA. Both their parents served in the military, and her father, Sgt. First Class Jeffrey Haycock, died in 2002 while in the Army.

“It creates much unneeded emotional stress for our families,” Haycock said. “They shouldn’t have to provide that four years in a row.”

Haycock said it’s an “unnecessary hassle” when the Defense Department “can easily verify to the Department of Ed that this is the family member of a fallen service member.”

Haycock said children of the fallen appear to get flagged often for verification because they tend to have low incomes but money in their bank accounts from survivors’ benefits. She said every fall, TAPS gets “panicked calls” from families trying to understand what’s going on with the FAFSA verification process after an expected Pell Grant doesn’t arrive.

**UNDOCUMENTED STUDENTS OR STUDENTS WITH UNDOCUMENTED PARENTS:** Undocumented students are not eligible for federal student aid, but in some cases, they fill out the
FAFSA because the information is used to obtain state or local institutional aid.

U.S. citizens with undocumented parents are eligible for federal student aid. Students and parents who are undocumented without a Social Security number are instructed to put zeroes when asked for their Social Security number. Also, students with parents who are undocumented can’t participate in some of the automated processes, so they must print out the form for their parents to sign and then mail it in.

Nancy Jodaitis, the director of higher education with Immigrants Rising advocacy group who formerly served as a financial aid counselor at San Francisco State University, said students and families in these situations are often scared to present their information when filling out the FAFSA.

There’s “fear, fear for themselves, fear for their parents within this political climate,” Jodaitis said.

Jodaitis said there needs to be more information available to these students by the federal government spelling out protections under the Family Educational Rights and Privacy Act — or FERPA.

She said a best practice is that schools use a paper-based FAFSA when working with undocumented students that allows them to hand-calculate a family's income.

**CHILDREN OF DIVORCED PARENTS:** Keller said her organization gets “tons and tons” of questions from families with divorced parents. A big challenge is knowing which information to include. For example, she said, if a student’s parents are divorced and the student lives with their mom who has remarried, the mom and stepdad’s financial information would be listed, not the biological father’s.

The federal Financial Student Aid website encourages students whose parents are divorced or separated to include information from the parent with whom they lived with the most during the last year. If it was the same amount of time, they are instructed to give answers about the parents who provided the most financial support during that period.

“The form doesn’t change, the questions aren’t any harder, it’s just whose information exactly needs to be on the form” sometimes trips up families of divorce, Keller said.

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**AUTHORS**

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