



March 28, 2024

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Dear Secretary Cardona,

On behalf of the undersigned higher education associations, I write to share the concerns institutions of higher education have regarding the challenges they face with processing the Institutional Student Information Records (ISIRs) and their confidence in their ability to package financial aid within weeks of the receiving the ISIRs. We ask that you fully communicate all information regarding the FAFSA process to institutions in a timely manner and provide the necessary support to ensure that they can make this process as smooth as possible for both current and incoming students.

Due to the passage of the Fostering Undergraduate Talent by Unlocking Resources for Education (FUTURE) Act¹ and the Free Application for Federal Student Aid (FAFSA) Simplification Act² by Congress, the Department of Education (Department) embarked on the implementation of both pieces of legislation. In efforts to implement both laws, certain systems needed upgrading, leading to the Department creating a new FAFSA processing system, the new Federal Tax Information (FTI) Module, and a new FTI Student Aid Internet Gateway (SAIG) mailbox.³ Institutions of higher education were informed that they would need to update their SAIG mailboxes in order to receive ISIRs for the 2024-2025 academic year (AY), and the SAIG enrollment agreement was made available on Oct. 23, 2023.⁴

In preparation for AY 2024-2025, the Department also had to modify the current FAFSA to comply with the FAFSA Simplification Act. The Higher Education Act sets a Jan. 1 statutory deadline for FAFSA submissions,⁵ and there is a current FAFSA processing cycle that consists of 21 months, allowing students to begin to submit a FAFSA on Oct. 1 prior to the start of the academic year in which they would enroll. The FAFSA was not available for students to complete on Oct. 1, 2023, and the Department issued an official notice last November

¹ Fostering Undergraduate Talent by Unlocking Resources for Education Act, 20 U.S.C. § 1067q *et. seq* & 26 U.S.C. § 6103 (2019).

<https://www.congress.gov/116/plaws/publ91/PLAW-116publ91.pdf>

² FAFSA Simplification Act, 20 U.S.C. § 1001 *et seq.* (2020). <https://www.congress.gov/116/plaws/publ260/PLAW-116publ260.pdf>

³ Federal Student Aid. (2023, May). *Access and use of federal tax information (FTI) for federal student aid programs beginning with the 2024-25 FAFSA processing cycle*. U.S. Department of Education. <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-12/access-and-use-federal-tax-information-fti-federal-student-aid-programs-beginning-2024-25-fafsa-processing-cycle>

⁴ Federal Student Aid. (2023, September). *Updated SAIG enrollment agreement available Oct. 23, 2023 – Required steps to receive 2024-25 ISIRs*. U.S. Department of Education. <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-09-22/updated-saig-enrollment-agreement-available-oct-23-2023-required-steps-receive-2024-25-isirs-updated-feb-9-2024>

⁵ Higher Education Act, 20 U.S.C. § 1090(a)(8) (1965 as amended through P.L. 118-40). <https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf>

indicating that the FAFSA would be delayed until Dec. 31, 2023.⁶ The delay in the FAFSA has resulted in other delays regarding the timeliness of ISIRs being delivered to institutions and now an even further delay due to miscalculations of the Student Aid Index for dependent students who reported assets.⁷ In addition, the Department announced that students would not be able to make corrections to their FAFSA until the first half of April.⁸ Also, because there has not been an official update to the Federal Need Analysis Methodology as required in statute,⁹ there will be delay in when institutions can accurately package their aid to students.

The American Council on Education, EDUCAUSE, and the National Association of College and University Business Officers (NACUBO) conducted a survey to assess the needs of our member institutions and gather feedback regarding their thoughts around the FAFSA delays, their efforts to update their SAIG mailboxes, and the processing of ISIRs. This survey was sent to college and university presidents, information technology administrators, enrollment officers, financial aid officers, and business officers. The survey yielded 358 respondents, and the majority of responses came from financial aid officers (251 responses). Also, 49 percent of all respondents (172 responses) were from four-year, private, nonprofit institutions.

The survey found that 80 percent of the respondents had already updated their SAIG mailboxes while 10 percent shared that they have not completed the update and another 10 percent were unsure. Given the recent news from the Department that only roughly 100 institutions remain in need of updating their SAIG mailboxes, the feedback we received seems to match the current landscape.

The following key concerns were identified:

- **Some institutions still face challenges updating their SAIG mailboxes** – For those institutions that have not updated their SAIG mailboxes, the majority expressed issues with technological limitations, the inability to get the proper help needed from the Department, and staffing issues. As examples, respondents expressed that:
 - Many institutions have been having issues with EDconnect 8.6.0 and are afraid that updating it will hinder their ability to process 2023-2024 aid;
 - Upgrades are being delayed because ISIR delivery is delayed, and it is important for the Department to work out all of the technological issues before institutions are able to successfully update their SAIG mailboxes;
 - Many institutions need more guidance on how to properly update their SAIG mailboxes and properly update EDconnect;
 - Some institutions have attempted to update the mailbox but have been experiencing issues with switching to the new version of TDClient; and
 - There was no resolution when calling the Department for support; institutions

⁶ Federal Student Aid. (2023, November). *Update on the simplified, streamlined, redesigned 2024-25 FAFSA*. U.S. Department of Education. <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-11-15/update-simplified-streamlined-redesigned-2024-25-fafsa-updated-jan-30-2024>

⁷ Federal Student Aid. (2024, March). *Update on 2024-25 FAFSA institutional student information record (ISIR) delivery*. <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-03-22/update-2024-25-fafsa-institutional-student-information-record-isir-delivery>

⁸ Federal Student Aid. (2024, March). *Update on 2024-25 FAFSA processing*. <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-03-25/update-2024-25-fafsa-processing>

⁹ Higher Education Act, 20 U.S.C. § 1087rr (1965 as amended through P.L. 118-40).

reported spending hours on the phone with no positive results.

- **Institutions remain uncertain about their ability to process ISIRs in a timely fashion** – a total of 67 percent of respondents shared that they do not believe they will be able to successfully process ISIRs within a few weeks. As examples, respondents shared that:
 - Institutions that had not yet received the test ISIRs were having issues with the test records made available on GitHub since they did not come through the SAIG mailbox, which impacted the ability of institutions to truly know if they would be able to process the test ISIRs effectively;
 - Software developers are having to create new dictionary items to match all of the new fields on the FAFSA, and not having the final version of the ISIRs makes it challenging for both developers and institutions to know if the system changes already implemented or in process will actually work;
 - Processing ISIRs within a few weeks is unrealistic—it will take at least four to six weeks;
 - Institutions will need additional time to complete new year system setup, which includes updating rules and appropriate testing; and
 - Although software providers have been following the rollout carefully and making the required programming changes to accept the new ISIR fields, both providers and institutions are concerned that the sheer volume of ISIRs received in the initial download will pose problems for financial aid management systems.

The attached document highlights the themes identified above and provides more information on how participants responded to each question that was asked. To address issues with the delay in the FAFSA, 47 percent of respondents shared that they would be adjusting their May 1 deadline dates and 13 percent indicated that they have already adjusted their dates. In an effort to keep track of institutions that are adjusting their deadline dates, ACE has a database that shares those institutions that are extending their deadlines to best serve students.¹⁰

We thank you for your attention to this letter. It is our hope that you will take these institutional responses into consideration and continue to be as transparent as possible with the higher education community to allow us to make this process as smooth as possible for both current and incoming students.

¹⁰ American Council on Education. (n.d.). *Extending enrollment and financial aid deadlines*. <https://www.acenet.edu/Policy-Advocacy/Pages/Extending-Enrollment-and-Financial-Aid-Deadlines.aspx>

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell". The signature is stylized with a large "T" and "M".

Ted Mitchell
President

On behalf of:

American Association of Collegiate Registrars and Admissions Officers
American Association of State Colleges and Universities
American Council on Education
Association of American Universities
Association of Catholic Colleges and Universities
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
Council for Christian Colleges & Universities
College and University Professional Association for Human Resources
Council of Graduate Schools
EDUCAUSE
Hispanic Association of Colleges and Universities
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
National Association of Student Financial Aid Administrators

SAIG & ISIRs Survey Analysis – updated 3.25.24

Population

Survey distribution yielded a total of 358 respondents. Among respondents, 355 provided position information. Most respondents (71 percent) identify as a Senior Financial Aid Officer.

Position	#	%
President, Chancellor, or Chief Executive Officer	4	1.1%
Senior IT Administrator or Officer	36	10.1%
Senior Enrollment Officer	40	11.3%
Senior Financial Aid Officer	251	70.7%
Chief Business Officer	2	0.6%
Other (please specify)	22	6.2%
Total	355	100.0%

By sector, nearly half (49 percent) of respondents are from four-year, private not-for-profit institutions.

Sector (Control x Level)	#	%
Public 4-Year	90	25.9%
Private, Not-For-Profit 4-Year	172	49.1%
Public 2-Year	75	21.4%
For-Profit	1	0.3%
Other	16	4.6%
Total	354	100.0%

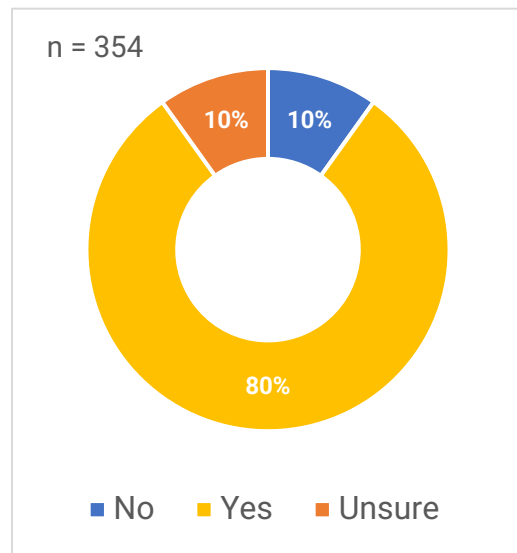
Executive Summary

- Four in five respondents (80 percent) indicated their institution has updated their SAIG mailbox, while 10 percent said they have not completed the update and an additional 10 percent were unsure of their completion status.
 - Among the **35 respondents** indicating they had not yet completed the update:
 - 34 percent cited technology limitations as a challenges
 - 34 percent cited difficulty accessing help from ED
 - 26 percent cited staffing challenges
 - 54 percent provided other reasons for challenges faced
- In terms of confidence that the respondent's institution's information systems will be able to process ISIRs data in a timely manner to be able to provide students with their financial aid awards within a few weeks of receiving ISIRs, **two out of every three (67 percent) respondents had mid-to-low confidence in their ability to accomplish this.**
 - There is a lower level of confidence reported by those who have not yet updated SAIG.
- Most respondents (79 percent) believe they will be able to generate financial aid awards within one (1) month after receiving ISIRs. *(This includes those who indicated one-week and two-week timeline options.)*
- Considering current events surrounding FAFSA, nearly half (47 percent) reported they will be adjusting the May 1 deadline for either enrollment commitments or campus services. An additional 13 percent indicated they already have deadlines later than May 1, 2024.¹

¹ Option of “No, we already have deadlines later than May 1” was added after the survey was in the field, so this represent the total proportion of individuals that responded to that option after it was added.

Q1 – Has your institution finished the required update to the SAIG mailbox, which must be completed by February 23, 2024?

Figure 1. SAIG Mailbox Been Updated



Four in five respondents (80 percent) indicated their institution has updated their SAIG mailbox, while 10 percent said they have not completed the update and an additional 10 percent were unsure of their completion status. (Figure 1)

Among the **35 respondents** indicating they had not yet completed the update:

- One-third cited technology limitations as a challenges
- One-third cited difficulty accessing help from ED
- One in four respondents cited staffing challenges
- Over half provided other reasons for challenges faced which are summarized below:

- **Operational Challenges**
 - Respondents have encountered challenges in the process of updating and installing new software, such as EdConnect. There have also been reports of challenges with setting up and transmitting files.
 - Resource limitations, such as staffing and bandwidth were also described as impacting implementation.
- **Communication and Support Problems**
 - Respondents indicate a lack of clear instructions and steps for implementation.
 - Several respondents describe difficulties in getting assistance and support from the Department of Education.

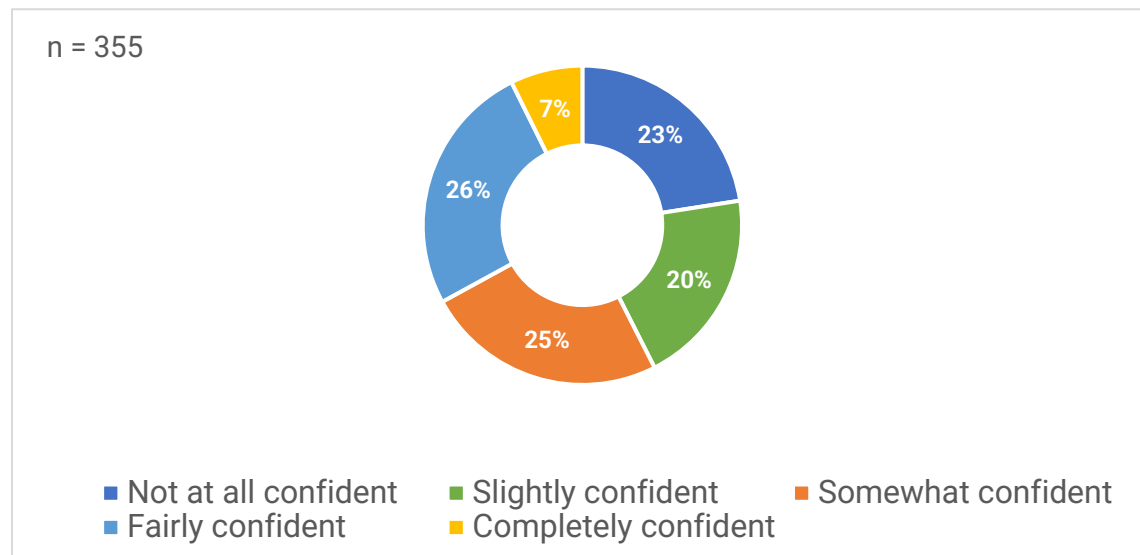
Q2_qual – What additional information (e.g. technical support, system information from the Department of Education) is needed to ensure a successful transition to the updated SAIG mailbox?

An aggregate of common themes among responses to this question are summarized below:

- **Technical Support Issues**
 - There is acknowledgment among respondents of the complexity in installation and configuration requiring expert assistance.
 - Respondents would like more comprehensive technical support systems, including webinars and training videos.
- **Communication and Clarity from Department of Education**
 - Respondents report unclear, inaccurate, and incomplete information from the Department of Education.
 - Respondents would like clearer communication, guidance, and step-by-step instructions.

Q3 – After your institution updates your SAIG mailbox and ISIRs are released, what is your confidence level that your institution’s information system(s) will be able to process ISIRs data in a timely manner, such that your institution will be able to provide students with their financial aid awards within a few weeks of receiving ISIRs?

Figure 2. Confidence Level in Timely Processing of ISIRs



In terms of confidence that the respondent's institution's information systems will be able to process ISIRs data in a timely manner to be able to provide students with their financial aid awards within a few weeks of receiving ISIRs, two out of every three (67 percent) respondents had mid-to-low confidence in their ability to accomplish this. (Figure 2)

Q3_qual - Since you did not indicate you are completely confident in your institution's ability to process the ISIRs in a timely manner, please share why and what additional assistance you may need (either from the Department of Education or elsewhere) to ensure your institution’s successful processing of the ISIRs.

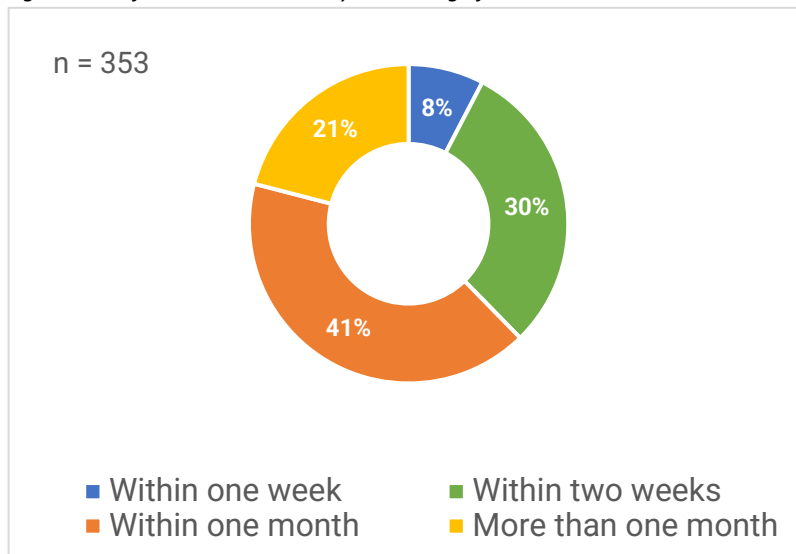
An aggregate of common themes among responses to this question are summarized below:

- **General Uncertainty and Lack of Confidence**
 - Respondents report concerns about dependency on outside consultants and external entities (e.g., state agencies, software vendors, etc.) and delays in receiving information from the Department of Education.
 - Several respondents express a lack of confidence in the whole process, citing issues with the Department of Education's management of the rollout, potential data errors in ISIRs, and time constraints to adequately prepare their systems.
 - There is additional frustration noted by respondents due to the inadequacy of the ISIRs test data provided, hindering respondents’ ability to test various scenarios and ensure system readiness to process aid awards.
- **Communication and Information Issues**
 - There is concern among respondents about the Department of Education’s ability to meet data deadlines and provide accurate information. Respondents note that communication has lacked clarity and transparency.
 - Respondents would like more detailed information about processes, data delivery dates, and FAFSA-related issues to aid in system preparations.

- *Resource Limitations and Staffing Issues*
 - Respondents share concerns about challenges in managing the complexities of the new ISIRs cycle while being under-resourced and under-staffed, creating additional stress on institutions.
- *Process Complexity and Adaptation*
 - Respondents acknowledge there is a massive learning curve in processing new ISIRs and adapting to changes in packaging strategies. Several respondents note the technical expertise needed to handle the new changes.
 - Some respondents report challenges in adapting to a new philosophy in packaging students, especially for Historically Black and under-resourced institutions.
 - Several respondents are concerned about the changes in Pell grant calculations and the absence of a Pell chart.
- *Software and System Challenges*
 - Challenges related to software updates as noted by respondents include system bugs, lack of accurate test data, and delays caused by changes in ISIRs file layouts.
 - Several respondents report system integration issues and concerns about system behavior with new data.
 - Respondents also express concerns about delays in receiving software updates from vendors like Ellucian Banner, which are crucial for processing ISIRs.
 - Some uncertainty is noted about data labeling and security requirements, with concerns about potential modifications to current operations and how that may impact implementation.
- *Testing Concerns*
 - Respondents are worried about testing every step of the ISIRs process in such a compressed timeline – this includes file import, review processes, SAI calculation, budgeting, and packaging formulas.
 - There are additional concerns about the adequate testing of the readiness and accuracy of software updates, leading to uncertainty in the ability to process ISIRs accurately.

Q4 – When do you think your institution will be able to generate financial aid awards from its information system(s) once you’ve received ISIRs?

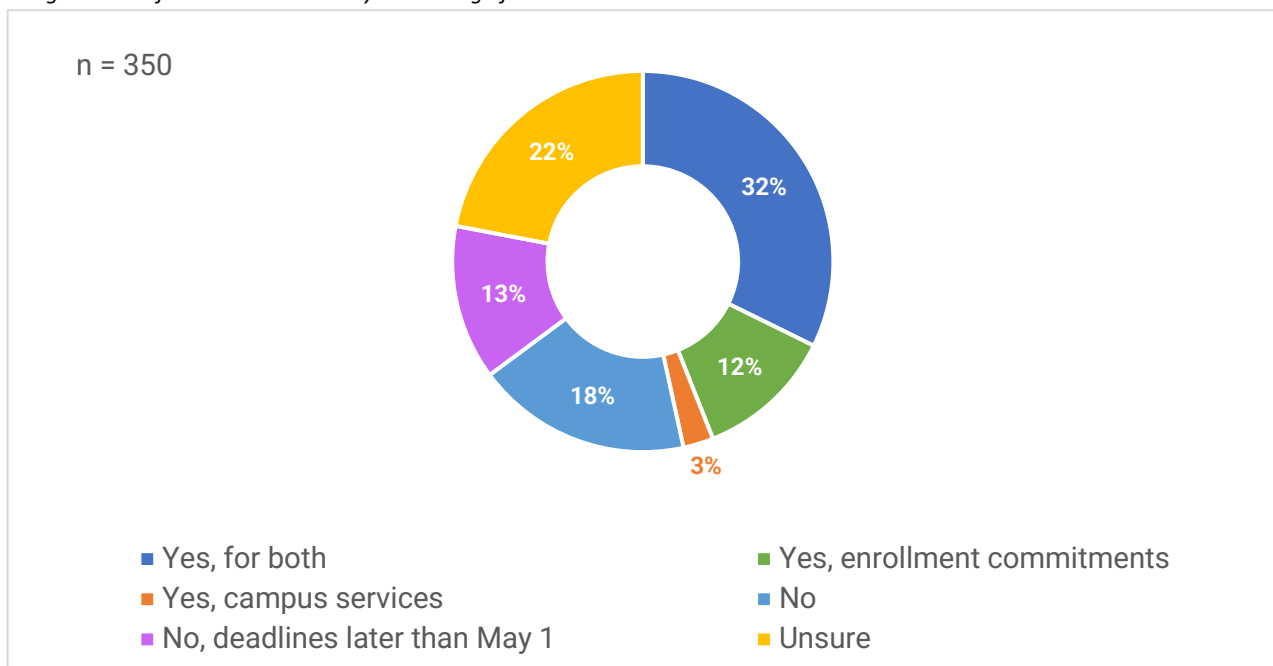
Figure 3. Confidence Level in Timely Processing of ISIRs



Most respondents (79 percent) believe they will be able to generate financial aid awards within one (1) month after receiving ISIRs. (This includes those who indicated one-week and two-week timeline options.) (Figure 3)

Q5 – In light of the current events surrounding FAFSA, is your institution considering adjusting the May 1 deadline for enrollment commitments, and/or other deadlines for campus services (e.g., applications for financial aid, housing, etc.)?

Figure 4. Confidence Level in Timely Processing of ISIRs



Considering current events surrounding FAFSA, nearly half (47 percent) reported they will be adjusting the May 1 deadline for either enrollment commitments or campus services. An additional 13 percent indicated they already have deadlines later than May 1, 2024.² (Figure 4)

² Option of “No, we already have deadlines later than May 1” was added after the survey was in the field, so this represent the total proportion of individuals that responded to that option after it was added.