



SC Higher Education Tuition Grants Commission

Providing Opportunity. Promoting Choice.

111 Executive Center Dr
Suite 242
Columbia, SC 29210
(803) 896-1120
info@sctuitiongrants.org

Katherine H. Harrison
Executive Director

UPDATE ON APPLICATION (FAFSA) PROCESSING

On March 11, 2024, the Tuition Grants Commission received its first 2024-2025 Institutional Student Identification Record (ISIR) file, containing FAFSA data for 11 South Carolina Residents. As files trickled in, Commission Staff worked closely with Nelnet to complete necessary testing and review of the data prior to it being loaded into production. On March 27, 2024, Commission Deputy Director Zachary Christian notified the financial aid offices at each of the participating colleges and universities of the availability of 2024-25 data in *myTG*.

Data as of April 11, 2024:

Date	Total ISIRs Received	2024-2025					%Change Awardees	%Change Applicants
		All Applications*	Invalid FAFSA	Graduate Student	Total Applicants*	Awardees		
3/26/2024	84,749	14,555	3,065	1,117	10,373	9,009	-49.39%	-48.57%
4/2/2024	89,124	15,248	3,177	1,174	10,897	9,450	-48.21%	-47.30%
4/11/2024	101,330	16,717	3,438	1,415	11,864	10,290	-44.72%	-43.74%

*Effective with 2024-25, "All Applications" Include Invalid FAFSAs and Graduate Students "Total Applicants" will be All Applications - Invalid/Grad Applications as the former database system did not convert "Invalid FAFSA" or "Graduate Student" as applicants.

While 2024-25 Applications are being received, the laundry list of known issues and knowledge of erroneous data is concerning. The U.S. Department of Education (ED) has provided recent guidance allowing Institutions of Higher Learning and State Grant Agencies to use FAFSA data that is known to be incorrect while making financial aid offers, leading to many students having eligibility that otherwise would not be eligible based on an accurate calculation of the need analysis. Commission Staff encourages all schools to utilize the reprocessed ISIR transaction for Tuition Grants purposes to avoid potential unintended consequences and to ensure that all student applications are used with data that is provided consistently and equitably; however, as with any Award Year, Tuition Grant eligibility will be based upon the same ISIR transaction being used to award Title IV and other financial aid at the student's chosen college.

On Monday, April 8, the National Association of Student Financial Aid Administrators (NASFAA) published a timeline of key events in the FAFSA Simplification process since the signing of the FAFSA Simplification Act (attached to this document). This timeline visually depicts the steps and missteps that have led to the current state of affairs.

In an [Electronic Announcement \(GENERAL-24-37\)](#) posted on April 9th, ED announced that student-initiated corrections would be "available for brief periods of time (i.e., several hours at a time) over the coming days to those who have submitted FAFSA forms." As students begin making corrections to their FAFSA forms, Commission Staff expect to see the amount of rejected "invalid FAFSA" applications decrease significantly.

On April 10th, Tuition Grants Commission staff identified an issue with how a student's school choice list on their FAFSA form is being altered during actual processing by the FAFSA Processing System. ISIRs for students who listed more than one school on their form are being processed by the FPS with their school choices in descending numeric order, instead of the

order in which they were listed by the student on their FAFSA form, which has been standard procedure for many years. After this issue was discovered and confirmed by our colleagues in other states that this was indeed an issue impacting all State ISIR files, it was reported to ED by Commission Executive Director Katie Harrison. This issue has since been acknowledged by ED, and will be fixed in an upcoming update to the FAFSA Processing System, but the Department has yet to provide any updates on if or how the currently impacted files will be addressed.

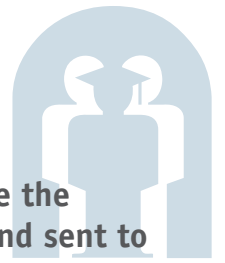
Because South Carolina Tuition Grants are processed to the first eligible college list on a student's application, with all school codes being provided in descending order, Commission Staff have no way of knowing which college should have been the first listed participating school, and thus the college listed on the student's Tuition Grants Record in *myTG*.

One main feature that will be available to students once the Commission begins sending tentative eligibility notifications will be the ability to complete grant transfers via the *myTG* Student Portal. Additional verbiage will be added to the Tentative Eligibility Notification emails, which will prominently display information regarding the grant transfer process and its ease of use within the *myTG* Student Portal, to ensure students are receiving clear guidance.

Commission Staff do, however, anticipate an increase in grant transfer requests, and communications from students who may be confused as to why they need to complete an extra step when they previously would not have needed to do so based on having correctly listed their school preferences on their FAFSA form.

As the *myTG* Student Portal is being finalized with clear and concise verbiage for all possible eligibility statuses, Commission Staff plan to begin sending Tentative Eligibility Notification emails to students later this month. All email notifications will direct students to create a *myTG* Student Portal Account and review their Tuition Grant eligibility status and award information, if applicable.

FAFSA Key Dates



In a normal processing year, the FAFSA is released on October 1. Students complete the FAFSA, the FAFSA is processed, and ISIRs are generated within 3-5 business days and sent to institutions. Applicants and institutions are typically able to make corrections to the FAFSA immediately after it is processed. Below is a timeline of the 2024-25 cycle.

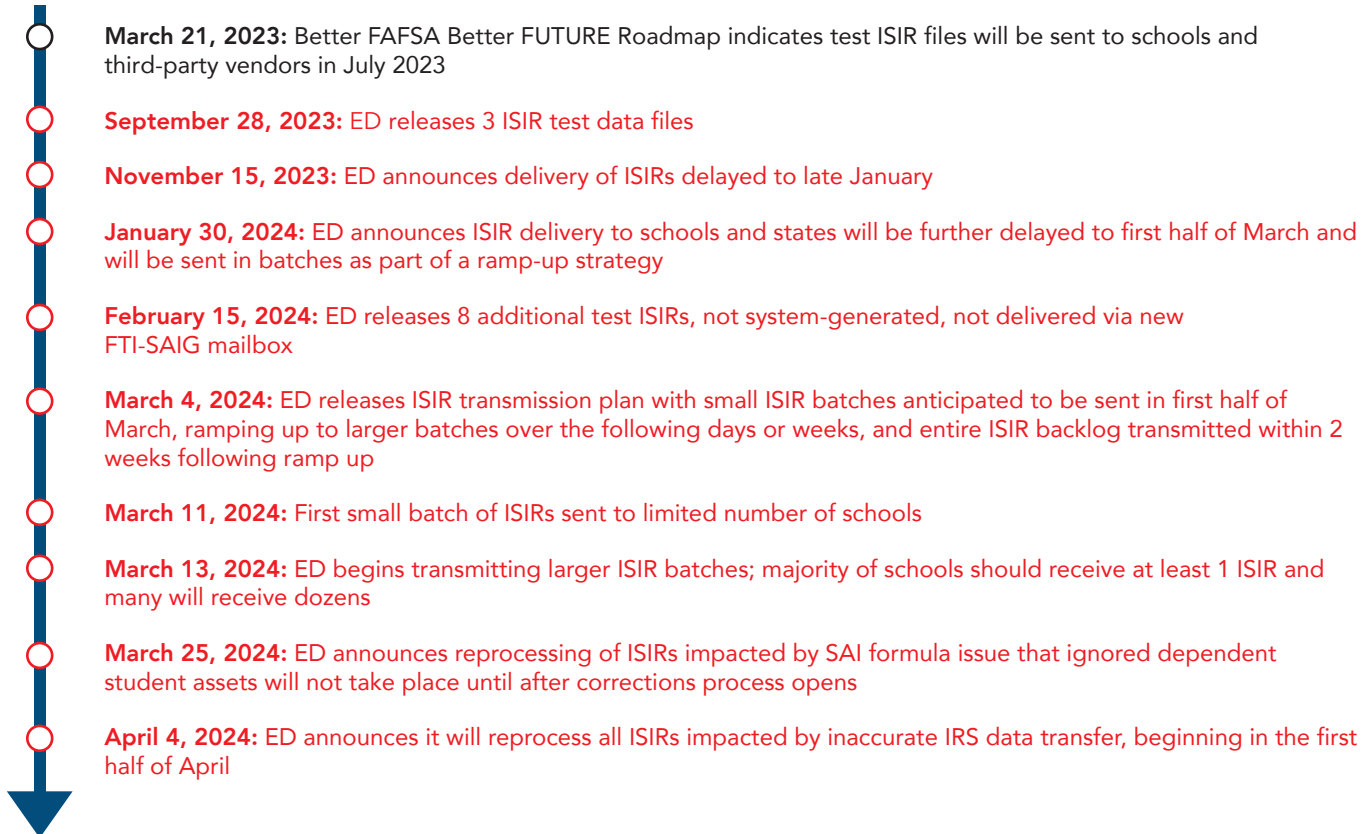
- December 27, 2020:** Consolidated Appropriations Act, 2021 signed into law; includes FAFSA Simplification Act
- January 19, 2021:** NASFAA includes FAFSA simplification as a top priority in a brief prepared for incoming Biden administration
- March 15, 2021:** Consolidated Appropriations Act, 2022 includes technical revisions to the FAFSA Simplification Act including delaying implementation for FAFSA and SAI formula provisions to 2024-25
- November 28 - December 1, 2022:** ED does not commit to October 1 FAFSA release date at its annual FSA Training Conference; shares vague dates for release of FAFSA-related documentation that do not appear to allow for an October 1 launch
- December 14, 2022:** NASFAA and NCAN send joint letter to White House asking for confirmation of whether 2024-25 FAFSA launch will occur on October 1
- February 7, 2023:** ED officials refuse to commit to October 1 FAFSA release date for 2024-25 at NASFAA's Leadership & Legislative Conference & Expo
- March 15, 2023:** NASFAA & other higher education organizations send a joint letter to ED asking for commitment on FAFSA release date
- March 21, 2023:** ED releases Better FAFSA Better FUTURE Roadmap with announcement of December FAFSA launch
- March 27, 2023:** ED releases 2024-25 paper draft FAFSA for 60-day public comment period
- September 18, 2023:** ED releases second draft paper FAFSA for 30-day comment period
- October 13, 2023:** NASFAA & other higher education organizations urge ED to provide specific FAFSA release date
- November 15, 2023:** ED announces 2024-25 FAFSA will be available by December 31. Students will also be unable to make corrections to submitted FAFSAs until late January
- November 17, 2023:** NASFAA joins other higher organizations in joint letter requesting more detailed information about timelines
- December 15, 2023:** ED announces FAFSA release will be a "soft launch"
- December 30, 2023:** FAFSA opens with significant outage periods and early reports of students unable to complete the application for various reasons
- January 7, 2024:** FAFSA Issue Alerts page created documenting many issues impacting applicants' ability to complete the form, including students whose contributors (parents and students' spouses) lack a social security number (SSN)
- January 30, 2024:** ED announces students will not be able to make corrections to submitted FAFSAs until the first half of March
- February 20, 2024:** ED announces resolution for FAFSA contributors without an SSN coming in first half of March; releases 9-step temporary workaround
- March 12, 2024:** ED announces that most contributors without an SSN can now complete their FAFSA section
- March 12, 2024:** ED announces IRS FA-DDX not working for contributors without an SSN
- March 15, 2024:** As larger batches of ISIRs are received, schools report seeing higher than normal rates of students applying for unsubsidized loan only. ED later changed the wording of the FAFSA question to ensure students answer correctly
- March 25, 2024:** ED announces delay in applicants' ability to make FAFSA corrections to the first half of April
- March 29, 2024:** ED catches up on FAFSA backlog

KEY Red = Late announcement or release | Blue = NASFAA action/communication
Orange = Department of Education error

ISIR Key Dates



The ISIR is the output document of the FAFSA that communicates the Student Aid Index (SAI) and Pell Grant eligibility to financial aid offices, which they use to determine a student's eligibility for financial aid. In a normal processing year, ISIRs are generated within 3-5 days after students submit the FAFSA, and are sent to institutions at that point. Below is a timeline of the 2024-25 cycle.



EdConnect Key Dates



EdConnect is a Windows-based software financial aid administrators use to send and receive federal student aid information, including ISIRs. EdConnect is occasionally updated, but not necessarily in conjunction with the start of an aid processing cycle. Due to the changes in the FAFSA Simplification Act, EdConnect required an upgrade. Below is a timeline of the 2024-25 cycle.

-
- November 8, 2023:** ED sends Electronic Announcement to schools instructing them to upgrade to EdConnect 8.6.0
 - December 4, 2023:** ED announces issue with EdConnect 8.6.0; offers temporary workaround and promises fix in future release
 - February 27, 2024:** ED announces release of EdConnect 8.6.1
 - February 29, 2024:** ED announces issue with EdConnect version 8.6.1; removes software file from website
 - March 1, 2024:** EdConnect version 8.6.1 is re-released with supposed fixes
 - March 11, 2024:** ED announces issue with headers and trailers identified in the supposedly fixed EdConnect version 8.6.1. Instructions provided to users who downloaded prior to March 11 indicate they must take one of two proposed actions to address issues



SAI Formula/Student Eligibility Determination Key Dates

Formerly known as the EFC, the formula that determines a student's aid eligibility is typically updated annually and finalized prior to the release of the FAFSA on October 1. In a normal processing year, ISIRs contain accurate SAIs upon which financial aid administrators can make financial aid offers to students. Below is a timeline of the 2024-25 cycle.

- December 27, 2020:** Consolidated Appropriations Act, 2021 signed into law; includes FAFSA Simplification Act
- March 15, 2021:** Consolidated Appropriations Act, 2022 includes technical revisions to FAFSA Simplification Act including delaying implementation for FAFSA and SAI formula provisions to 2024-25
- November 21, 2022:** ED publishes 2024-25 Draft Student Aid Index (SAI) and Pell Grant Eligibility Guide; tables reflect original figures from FAFSA Simplification Act
- May 19, 2023:** ED releases first update of Draft Student Aid Index (SAI) and Pell Grant Eligibility Guide; tables still reflect original figures from FAFSA Simplification Act
- August 25, 2023:** ED issues second update to Draft Student Aid Index (SAI) and Pell Grant Eligibility Guide; tables still reflect original figures from FAFSA Simplification Act
- September 13, 2023:** A participant asks ED in a FAFSA webinar whether tables in the SAI formula will be updated for inflation; ED indicates no plans to do so for 2024-25 but will update in 2025-26
- September 21, 2023:** ED releases FSA Estimator
- September 25, 2023:** FSA Estimator taken down due to inaccurate SAI/Pell information being generated
- October 16, 2023:** NASFAA requests that ED update SAI formula tables for inflation
- January 23, 2024:** White House announces SAI formula tables will be updated; no details on when tables will be updated or whether it will impact ISIR delivery promised for late January
- January 30, 2024:** Final SAI Guide with formula tables updated for inflation published
- February 27, 2024:** ED announces it is making a significant change to the SAI formula to permit the Student Contribution from Income (SCI) to be as low as -\$11,130 vs. -\$1,500 from earlier versions of the SAI formula
- February 28, 2024:** ED is alerted to an issue with SAIs being incorrectly calculated due to dependent student assets being ignored
- March 1, 2024:** President Biden signs continuing resolution legislation, amending the FAFSA Simplification Act to place a -\$1500 floor on the SCI for 2024-25 and \$0 floor for 2025-26 and beyond to address earlier ED error
- March 12, 2024:** ED announces error in estimated SAIs provided to students from households with 2 income earners where one income is < \$60K causing assets not to be considered in the SAI
- March 21, 2024:** ED notified by a financial aid administrator that the IRS FA-DDX appears to be transferring the wrong line item from the tax return for US taxes paid, using a higher figure that includes self-employment tax (meaning SAIs are appearing to be lower than they should be)
- March 22, 2024:** ED announces error in SAIs being delivered to schools on ISIRs where student assets were not being counted toward the student contribution in the SAI, requiring reprocessing
- March 22, 2024:** ED notified by an FAA that IRS FA-DDX appears to be transferring incorrect figures for education credits
- March 29, 2024:** ED announces it is aware of reports concerning tax data provided on the Institutional Student Information Records (ISIRs) for 2024-25 FAFSA applications
- March 30, 2024:** ED updates March 29 Electronic Announcement regarding potential incorrect FTI data transferred from ED. Confirms <20% of applications are impacted. Confirms issues of "some fields are a mix of updated and original returns", education credit data inaccurate, manual entry tax paid and education credits wrong due to discrepancies in the instructions
- April 1, 2024:** ED provides follow-up on three separate incorrect tax data issues. Shares that it will only reprocess records if reprocessing would result in a lower SAI but that institutions can use PJ to use existing (incorrect) data or request reprocessing but that ED will assume schools will use incorrect data to make financial aid decisions

KEY Red = Late announcement or release | Orange = Department of Education error
Blue = NASFAA action/communication