



March 14, 2017

The Honorable Betsy DeVos
U.S. Secretary of Education
400 Maryland Ave, SW
Washington, DC 20202

Mr. Jim Runcie
Chief Operating Officer
Federal Student Aid
830 First Street, NE
Washington, DC 20002

Dear Secretary DeVos and Mr. Runcie:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and the undersigned organizations, I write to seek relief for students and institutions as they deal with the sudden and unexpected outage of the IRS's Data Retrieval Tool (IRS). Our collective organizations represent thousands of institutions, financial aid administrators, college access professionals, admissions and guidance counselors, and students.

Since its inception eight years ago, the DRT has become the cornerstone of simplification, with students and schools relying on its efficiency for both the application and verification processes. The abrupt outage in the midst of application filing season is extremely troubling, made worse by the fact that it took the Department of Education (ED) and the IRS nearly a week to publically acknowledge that it was not working.

Immediate steps should be taken by ED to ease the resulting application and verification burdens that will fall squarely on students. Schools will also be faced with increased administrative burden that could lead to delays and backlogs for students. We ask ED to take the following actions:

1. Updating and correcting FAFSA information and instructions across federal websites regarding the availability of the IRS DRT.
2. Allowing signed copies of tax returns from applicants to satisfy verification documentation requirements as an optional replacement for DRT information or IRS tax transcripts.
3. To the extent that current verification modeling is based on whether students utilized the DRT, revising the verification selection criteria to provide a more generous tolerance to ensure that the numbers of students selected for verification remains stable and manageable by institutions so that financial aid processing can continue uninterrupted.
4. Since the DRT is the primary tool to ensure income reporting accuracy in this first year of using prior-prior year income, expanding the tolerance used for required school resolution of conflicting information.

We also want to draw attention to the application and renewal processes for income-driven repayment plans, which also rely on the DRT. Restoration of the DRT needs to be a high priority for both ED and the IRS and we urge ED to leverage all available resources to restore the DRT as soon as possible.

We understand that legitimate security concerns cited by ED and the IRS may have led to the tool being disabled. We request that ED publically share the specific cause of this outage and how this issue could have been avoided.

We ask that you also explain why users of the tool and other key stakeholders were not informed of this outage until nearly a week after the system went down. This lack of communication is unacceptable, especially in the middle of the financial aid application season.

If the tool is reactivated with additional authentication steps for students, we ask that ED consider the implications of a more complicated process on low-income families. Any new front-end changes should be informed by stakeholder input, where possible.

We look forward to continued cooperation with ED to ensure that we are fulfilling our promise to provide a quick and accurate financial aid application process to America's families.

Sincerely,



Justin Draeger,
President and CEO, NASFAA

Also on behalf of:

National Association for College Admission Counseling (NACAC)

National College Access Network (NCAN)

The Institute for College Access and Success (TICAS)

cc: Ms. Lynn Mahaffie, Delegated Duties of Assistant Secretary for Postsecondary Education,
U.S. Department of Education
Mr. John Koskinen, Commissioner, Internal Revenue Service