

next  
**PAGE**



# Early FAFSA & PPY

Session Presenters:

Joan Hock, Director of Financial Aid,  
Delaware Valley University

Joan Holleran, Assoc. Director of Financial Aid,  
Kutztown University

Ginny Kopko, Slippery Rock University

# History of Prior-Prior Year (PPY)

- Executive order signed by former President Obama September 13, 2015
- Established that the 2017-18 FAFSA would be available October 1, 2016 and would use two years prior tax information



- Not permanent at this time. Executive orders can change!

*next*  
**PAGE**

# Expected Benefits of PPY

- Earlier, more reliable understanding of aid eligibility
- Financial aid process more aligned with admission process
- More time for families to research and understand options
- No longer have to estimate income or taxes paid
- Use DRT for more accuracy since taxes already filed
- Simplified verification due to use of DRT

*next*  
**PAGE**

# PPY

- Is it what we expected?
- Is it what we wanted?
- Pros/cons



*next*  
**PAGE**

# Prior-Prior Year



next  
**PAGE**

# The Good

- Less complicated FAFSA application process with use of DRT
- ↓ estimated tax information, corrections
- ↑ accuracy of tax information since taxes already filed
- ↓ burdensome verification with ↑ use of DRT
- Earlier, more accurate, more reliable award letters



*next*  
**PAGE**

# More Good



- PHEAA moved up estimated state grant awards earlier
- FAM systems and Dept of Ed were ready for earlier processing
- Dept of Ed, NASFAA, PASFAA, College Board and media outlets proactive in publicizing changes
- Thankfully, only one crossover year

*next*  
**PAGE**

# The Bad

- Earlier award letters but challenging to implement
- ↑ PJs – use 2016 or 2017?
- Form 4506 – did not file confirmation
- DRT down until October 1, 2017
- 1040 or not to accept 1040
- Many incumbents using 2016 and not filing any earlier
- Parents can't see data in 2018-19



*next*  
**PAGE**



# The Ugly

399

*next*  
**PAGE** 

# The Ugly Comment Code 399

<u>Comment</u>	<u>Description</u>
001	WHAT YOU MUST DO NOW (Use the checklist below to make sure that all of your issues are resolved.)
006	If you need to make corrections to your information, you may either make them online at <a href="http://www.fafsa.gov">www.fafsa.gov</a> using your FSA ID, or by using this SAR. If you need additional help with your SAR, contact your school's financial aid office or visit <a href="http://www.fafsa.gov">www.fafsa.gov</a> and click the "Help" icon on the FAFSA home page. If your mailing address or e-mail address changes, you can make the correction online or send in the correction on your SAR.
149	Based on the information we have on record for you, your EFC is <EFC>. You may be eligible to receive a Federal Pell Grant and other federal student aid. Your school will use your EFC to determine your financial aid eligibility for federal grants, loans, and work-study, and possible funding from your state and school.
170	Your FAFSA has been selected for a review process called verification. Your school has the authority to request copies of certain financial documents from you and your parent(s).
267	There is a limit to the total amount of subsidized Federal student loans that you may receive. Please visit <a href="http://StudentAid.gov">StudentAid.gov</a> and select Types of Aid/Loans for more information.
349	There is a limit to the total amount of Federal Pell Grants that a student may receive, which is the equivalent of 6 school years. Once a total amount of Pell Grant eligibility has been received, a student can no longer receive Pell Grant aid.
399	Your Financial Aid Administrator may contact you to resolve any issues related to differences in the 2015 income information you reported on your 2016-2017 FAFSA and 2017-2018 FAFSA.

*next*  
**PAGE**

# The Ugly Comment Code 399



- Exclusively for 2017-18 where discrepancies exist between 2016-17 and 2017-18 applicant data
- With implementation of prior-prior year, financial information submitted for the two cycles should be the same
- 399 generated if tax info conflicts across aid years

next  
**PAGE**

## Conflicting Information but Comment Code 399 not Generated

- Student files 2016-17 and 2017-18 FAFSAs
- Won't be flagged if not expected to be Pell eligible for 2017-18
- For records with auto zero EFC for 2017-18, will only flag if difference in both years' EFCs is over a certain CPS calculated threshold
- CPS said it would not flag if on either year a PJ exists **BUT** it is flagging many

*next*  
**PAGE** 

# When Comment Code 399 is Generated

- Student files 2016-17 and 2017-18 FAFSAs
- CPS determines there is a significant difference in financial info (EFC differences calculated by CPS are over certain threshold) and no excluding event exists
- School must resolve. May require return of funds from aid already paid to student
- Will student withdraw, not be able to register?



next  
**PAGE**

# What Our Colleagues Told us About Early FAFSA and PPY

*next*  
**PAGE** 

## How did opening up the FAFSA earlier affect the timing of your awards to freshmen?

“We were able to send incoming freshmen and transfers their award letters about two months earlier in mid-January.”

Joe Alaimo, LaSalle University

“We packaged our incoming freshmen beginning the last week in November. Our awards previously went out the last week of February.”

Christine Saadi, Alvernia University

“WCU made awards in mid-February, moving them up from late March. We will probably make them earlier next year, maybe early February.”

Dana Parker, West Chester University

## What kind of concerns did you have about sending out award letters earlier than prior years?

“Everything had to be accelerated: publications, forms, communications, IT updates, packaging set-up, testing.”

Bill Burke, University of Scranton

“Concern about funding levels for campus-based funds.”

Janice Hetrick, Holy Family University

“Concern that our faculty, dept. chairs and deans might not have sufficient time to enter incoming student scholarships to be included in first batch of award letters. With good cooperation, we were able to include the funds in award letters.”

Ragan Griffin, Indiana University of PA

*next*  
**PAGE**



## Will you follow the same awarding pattern for next year?

“For Early Decision, awards will go out in December but for Early Action and Regular Decision, they will go out in March when Admission offers are made.”

Bonnie Behm, Villanova University

“I think we will adhere to a similar schedule (Early Action in mid-December, need-based awards in mid-January). We were pleasantly surprised that our percentage of accepted students with completed FAFSAs was actually higher in January compared to March in prior years.”

Bill Burke, University of Scranton

*next*  
**PAGE**

## Did you find an increase in FAFSAs filed earlier by your incumbents?

“Yes, we had at least 2000 more in January than in prior years.”

Cindy King, Northampton CC

“Not really. Some students applied as soon as the FAFSA was available but many waited until, or after, our May 1 returning student financial aid application deadline.”

Ruth Cramer, Dickinson College

“Somewhat yes, but they were confused about using PPY and despite our best efforts (e-mails, social media, bulletin boards, live webinars), many still waited until 2016 taxes were filed to complete their 2017-18 FAFSA.”

Christine Saadi, Alvernia University

*next*  
**PAGE** 

## What has been the most challenging aspect of PPY, and how has it affected your operation?

“The 399s have been the most challenging this year.”

Patty Zink, Washington Hosp. Sch. of Nursing

“Along with 399s, getting students to give us the verification documents since the DRT went down.”

Donna Wilkoski, Bucks CCC

“The reduced income requests. It is hard to decide if we want to use 2016 or 2017. We handle them case by case. We need a counselor to monitor them every time we load ISIRs.”

Suzanne Sparrow, Ursinus College

## Is there an impact on your receivables due to the need to return aid already paid?

“Currently, our worst case scenario would be 41 students who may have federal aid removed. We notified the Bursar and Associate VP for Finance of this potential risk.”

Ragan Griffin, Indiana University of PA

“Have not been able to evaluate that yet. Most are understanding and want to make payment arrangements.”

Cindy King, Northampton CC

“Little; so far we have been able to identify other resources to make up for 2016-17 aid loss.”

Dana Parker, West Chester University

*next*  
**PAGE**

## How are you handling PJs? Using 2016 or 2017?

“We are using 2016, but we can review if there is an extenuating circumstance.”

Donna Wilkoski, Bucks CCC

“PJs are being considered mostly with 2017 but we used some 2016. We have even averaged income over three years in one or two cases. PJs this year are truly an individual read and see what works best, but in most income loss cases, it is 2017.”

Bonnie Behm, Villanova University

“We are collecting all three years. 2015 to make sure FAFSA is correct, 2016 tax information, and an estimate on 2017. We will use either 2016 or 2017 – whichever will benefit the student.”

Joe Alaimo, LaSalle University



“We are using 2017 estimated income.”

Janice Hetrick, Holy Family University

## Do you send out award letters before verification is complete?

“We send out need-based awards notifications for freshmen and new transfer students prior to verifying FAFSA data except those we flag for figures that appear incorrect. For returning students, we complete verification before packaging.”

Bill Burke, University of Scranton

“Yes.”

Ragan Griffin, Indiana University of PA

“Never.”

Cindy King, Northampton CC

*next*  
**PAGE** 

# Questions?

# Need More Information?



Joan Hock  
Director of Financial Aid  
Delaware Valley University  
700 East Butler Ave., Doylestown PA 18901  
215.489.2975 | (fax) 215.489.4959  
[joan.hock@delval.edu](mailto:joan.hock@delval.edu) | [delval.edu](http://delval.edu)  
Follow us: [twitter.com/delval](https://twitter.com/delval) | [facebook.com/delval](https://facebook.com/delval)



**Joan L. Holleran** | Associate Director, Financial Aid Services  
**Kutztown University of Pennsylvania**  
209 Stratton Admin. Ctr. | PO Box 730 | Kutztown Pa. 19530  
Phone: 610-683-4031 | Fax: 610-683-1380 | [www.kutztown.edu](http://www.kutztown.edu)

*next*  
**PAGE**

Thanks for attending!



next  
**PAGE**