February 7, 2024

The Honorable Gene L. Dodaro  
Comptroller General of the United States  
U.S. Government Accountability Office  
441 G Street N.W.  
Washington, DC 20548

Dear Comptroller General Dodaro:

The Department of Education’s (Education) Office of Federal Student Aid (FSA) is the largest provider of student financial aid in the nation. In fiscal year 2022, the office processed about 17 million Free Application for Federal Student Aid (FAFSA) forms (paper and electronic) and delivered approximately $110.7 billion in aid to about 10 million postsecondary students and their families.¹

Each student applying for federal financial aid must complete a FAFSA, either electronically or on a paper copy, which is used to determine student aid eligibility. Until recently, most of the FAFSA forms have been submitted electronically through Education’s Central Processing System (CPS). However, FSA has reported that CPS is an expensive and outdated legacy system.

In 2021, FSA initiated a multi-project program called the Student Aid and Borrower Eligibility Reform (SABER) initiative, which, among other things, is intended to replace and modernize CPS. This CPS replacement project within SABER is referred to as the Award Eligibility Determination project. In June 2023, GAO reported that this project was in need of additional testing before it could achieve its goal of fully implementing the project by December 2023 and begin processing FAFSA forms in a new system, referred to as the FAFSA Processing System, by January 2024 for the 2024-2025 application cycle.²

On December 31, 2023, Education posted on its Federal Student Aid X account (formerly known as Twitter) that the Department started the “soft launch” of the 2024-25 FAFSA form on December 30.³ The post added that Education would be monitoring site performance during this launch period, initiating pauses to the site to conduct maintenance, and that Education had identified some minor issues affecting user experience. On January 1, 2024, Education posted to

² Id. Of note, GAO found that the project officials did not document the assumptions that informed the schedule (e.g., resource availability). In addition, the schedule did not provide rationales for constraints that limit the movement of activities. GAO concluded that, until project officials document schedule assumptions and their rationale for the schedule constraints, decision makers cannot be confident in the reliability of the schedule, or their decisions based on this schedule. GAO made a recommendation to Education to address this weakness; as of February 7, 2024, Education has not implemented the recommendation.
³ https://twitter.com/FAFSA/status/1741590737009918344.
X that the form was available “for short periods of time to ensure a better experience for students and families.”

However, media reports paint a more frustrating user experience than what Education communicated on social media. According to one media report, the application was available for only three hours from December 30, 2023, through January 2, 2024. In addition, many applicants experienced repeated loading screens, “Please Wait” pages, errors in submission, and other issues, according to a separate media report.

Based on the initial poor user experience, we have significant questions about the extent to which the FAFSA Processing System underwent all needed testing, what system issues were uncovered in testing, and the decision-making process to roll out the system with known issues. Accordingly, we request that GAO review the recent launch of the FAFSA Processing System. In formulating its specific objectives for this work, we ask that GAO consider the following:

1. To what extent did FSA perform needed testing on the system used to submit the 2024-25 FAFSA form?
2. What system issues were identified as part of testing and to what extent were those issues resolved?
3. To what extent were Education and FSA leadership aware of system issues and involved in launch decision-making?
4. What system issues remain unresolved and does FSA have plans to address them?
5. To what extent has Education and FSA established and implemented a process to gather lessons learned from this launch ensuring that these lessons are incorporated in future system releases?

Thank you for your assistance in this matter. Please contact Patrick Fox of Ranking Member Cassidy’s staff at patrick_fox@help.senate.gov and Gabriella Pistone of Chairman Foxx’s staff at gabriella.pistone@mail.house.gov to discuss the details and timing of this GAO review.

Sincerely,

Bill Cassidy, M.D.
Ranking Member
Senate Committee on Health, Education, Labor, and Pensions

Virginia Foxx
Chairwoman
U. S. House Committee on Education and the Workforce

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4 [https://twitter.com/FAFSA/status/1741926916452487507](https://twitter.com/FAFSA/status/1741926916452487507).
5 USA Today, New FAFSA form, still difficult to get to, opens for longer hours. Here are the details, Jan. 5, 2024, [https://www.usatoday.com/story/money/personalfinance/2024/01/05/fafsa-2024-25-hours/72110982007/](https://www.usatoday.com/story/money/personalfinance/2024/01/05/fafsa-2024-25-hours/72110982007/) (last accessed January 12, 2024).