

**Purpose of this document:** To gather and respond to frequently asked questions about production ISIRs for the 2024-2025 FAFSA year. The U.S. Department of Education (the Department) will update this regularly in March and April 2024 as it continues to receive and respond to questions from partners.

The primary audience for this document is technical users at post-secondary institutions and partners developing systems.

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# Known Issues

Last updated: 4/4/2024

## Open Issues

### Inconsistent tax data transferred via FA-DDX or manually entered on the FAFSA. (New)

**Status:** Open (Added 3/30/24)

**Description:** The Department has worked closely with the IRS to assess the reports concerning inconsistent tax data sent to schools on ISIRs for 2024-25 FAFSA applications. Together, the Department and the IRS identified three issues that impact a subset of FAFSA forms. The first and second issues may occur for a subset of applicants and their contributors who successfully have federal tax information (FTI) transferred via the IRS FUTURE Act Direct Data Exchange (FA-DDX). The third issue impacts a subset of applicants and their contributors who were required to manually enter their income and tax information. Across these three issues, the Department and IRS estimate that approximately 5% of previously submitted FAFSA applications need to be reprocessed because the

errors would result in decreased financial aid eligibility for students if unresolved. In total, more than 80% of FAFSAs are unaffected by these three tax issues:

1. **Education Tax Credits:** Data for education tax credits transferred prior to March 30, 2024, impacting about 15 percent of FAFSA applications, are inconsistent. The IRS has updated the FA-DDX to include the actual reported amounts of education tax credits for applications submitted moving forward.
2. **Amended and Updated Tax Returns:** In cases in which taxpayer information is updated through an amended tax return, the most recent adjusted gross income (AGI) and filing status is mixed with original values for other tax return elements, leading to inconsistent tax data. The Department believes that this issue affected fewer than 2 percent of processed FAFSAs, based on preliminary estimates.
3. **For manually entered tax information,** written instructions for manually entering education tax credits and income taxes paid are inconsistent with the data transferred from the IRS. The Department believes that these issues affect a very small number of FAFSAs.

Learn more about these issues, resolutions, and guidance to institutions through the department's electronic announcement, [Update on Tax Data Received from the FA-DDX and Manually Entered Information](#).

**Resolution (in-progress):** The Department expects to begin reprocessing impacted FAFSA records in the first half of April. Schools and state agencies will receive a subsequent ISIR transaction for each reprocessed record.

## **Federal tax information (FTI) is missing from some non-rejected ISIRs where FTI consent has been provided. (New)**

**Status:** Open (Added 4/3/24)

**Description:** There are cases where a production ISIR is not a reject, contributors have provided consent to retrieve and disclose FTI from the IRS, there is not manual tax data, and yet the FTI data and SAI is missing without expected flags and errors on the ISIR.

**Resolution (in-progress):** The Department is actively investigating this issue.

## **Redundant comments for students who indicated they were unaccompanied and homeless or self-reported as being at risk of being homeless.**

**Status:** Open (Added 3/25/24)

**Description:** These students should only receive comment 325 on their ISIR, but their ISIRs currently include comment codes 003 and 325.

**Resolution (in-progress):** The Department will refine FPS to only trigger comment 325.

**The SAI field is blank on some production ISIRs that do not contain reject codes.**

**Status:** Open (Added 3/21/24)

**Description:** If a processed ISIR contains no reject codes, then the SAI field should never be blank.

**Resolution (in-progress):** The Department is actively investigating this issue.

**The “Student Contribution from Assets (SCA)” (field 328) is sometimes blank on ISIRs even though the student has assets and SCA is correctly included when calculating the SAI. (New)**

**Status:** Open (Added 3/29/24)

**Description:** The SCA field is not expected to be blank in this circumstance.

**Resolution (in-progress):** The Department is actively investigating this issue.

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## Resolved Issues

**Pell Eligibility Flag was incorrectly set to Y on ISIRs without an SAI. (New)**

**Status:** Resolved 4/1/2024

**Description:** The Pell Grant Flag should not be set to Y on rejected records. This issue impacted less than 1% of records.

**Resolution:** These rejected records will be reprocessed, at which point the Pell flag will be accurately set. The Department expects to begin reprocessing impacted FAFSA records in the first half of April. Schools and state agencies will receive a subsequent ISIR transaction for each reprocessed record.

**Dependent students with assets may have blank “Student Contribution from Assets” (SCA) values on production ISIRs, resulting in miscalculated SAIs. (Updated)**

**Status:** Resolved 3/22/24

**Description:** The FAFSA® Processing System (FPS) was not including all data fields needed to correctly calculate the Student Aid Index (SAI) for dependent students who reported assets. FPS used the student’s Adjusted Net Worth of Businesses and/or Investment Farms to calculate the Student Contribution from Assets (ISIR field 328) and should have also included the student’s Current Net

Worth of Investments and Total of Cash, Savings, and Checking Accounts. This resulted in an SAI that was lower than expected and an inaccurate total Student Contribution from Assets value.

**Workaround:** Schools and states can recalculate the SAI to develop a tentative aid package for an affected student without waiting to receive a reprocessed ISIR. Though the SAI is miscalculated, recalculating the SAI using the fields in the ISIR will result in a correct SAI.

**Resolution:** The Department expects to begin reprocessing impacted FAFSA records in the first half of April. Schools and state agencies will receive a subsequent ISIR transaction for each reprocessed record. Schools and states will have the ability to use their judgment to rely on the original ISIR sent—not the reprocessed record—if the original ISIR results in greater financial aid eligibility for students.

## **Comment Codes (Field 568, Position 3889-3948) are sometimes blank on production ISIRs.**

**Status:** Resolved 3/22/24

**Description:** Every ISIR should have at least 1 comment code (Reject, Pell Eligible, or Pell Ineligible). Note: Comment Code 001, "What To Do Next," is not added to any 2024-25 ISIRs and will be removed from the *2024-25 FAFSA Specifications Guide, Volume 7* in the future.

**Resolution:** The ISIR will now contain at least one comment code.

## **Students whose U.S. citizenship is not confirmed by the Social Security Administration show Comment Code 146 instead of 018.**

**Status:** Resolved 3/22/24

**Description:** The Social Security Administration (SSA) confirms students' citizenship status. If SSA cannot confirm that the student is a U.S. citizen, a C Flag is presented, requiring a resolution. In these instances, 018 is the correct Comment Code, but Comment Code 146 is currently erroneously displayed.

**Workaround:** FAAs can independently verify a student's citizenship status.

**Resolution:** The proper Comment Code is now applied.

## **Unexpected "N/A" appears in NSLDS fields on production ISIRs.** **(Updated)**

**Status:** Resolved

**Description:** Some data fields received from NSLDS on the ISIR have "N/A" as a text value in numeric fields. This is an unexpected value according to the current layout specification.

**Resolution:** The Department is updating the ISIR record layout to include "N/A" as a valid value in the NSLDS Pell SAI fields, the TEACH Grant Discharge Amount fields, and the TEACH Grant Adjusted Disbursement fields.

## Pell Eligibility Flag is incorrectly set for some students. (Updated)

**Status:** Resolved

**Description:** The Pell Eligibility Flag was incorrectly set for some students. FPS should have set the Pell Flag to Y but left it blank for some students whose SAI calculation changed from the initial calculation performed when submitting the FAFSA to the more recent calculation that adjusts for inflation.

**Workaround:** If the student's Pell indicator is set but the Pell Eligibility Flag isn't, institutions and third-party servicers should include the Pell amounts when packaging these students as long as other Pell eligibility criteria are met (e.g., the student is pursuing a teacher certification, the student is eligible for or grandfathered from Children of Fallen Heroes and Iraq Afghanistan Service Grants).

**Resolution:** This issue was present on early batches of transmitted ISIRs but has since been fixed. The Department expects to begin reprocessing impacted FAFSA records in the first half of April. Schools and state agencies will receive a subsequent ISIR transaction for each reprocessed record.

## Comment Code 152 sometimes appears erroneously on ISIRs.

**Status:** Resolved

**Previous Description:** Comment Code 152 ("It may be too late for you to submit corrections to your FAFSA form...") is sometimes appearing in Comment Codes (Field 568, Position 3889-3948) on 2024-25 production ISIRs even though there is still plenty of time before the deadline to submit corrections.

**Resolution:** This issue was present on some of the early batches of production ISIRs, but it is no longer an issue.

# Technical FAQ

## Production ISIRs

### How is family size calculated and displayed on the 2024-25 ISIRs?

*This is summary response and not a replacement for technical documents that provide further detail on this topic:*

- [2024-25 Student Aid Index \(SAI\) and Pell Grant Eligibility Guide](#)

“Family size” has replaced “household size” when calculating a student’s Student Aid Index (SAI). There are some important differences between how family size appears on an ISIR versus how household size appeared. Notably, family size can appear in multiple places throughout the ISIR – there is not one location in the ISIR file that always contains family size. Family size fields are laid out in this way due to the introduction of Financial Tax Information (FTI) and the direct connection with the IRS.

We know that a clear understanding of how family size works is critical for post-secondary institutions and partners, both for use in calculating SAI and Pell Grant eligibility, as well as in post-calculation scenarios such as verification and discussing federal student aid with families.

**A high-level orientation to family size on the 2024-2025 ISIR is provided here, please see the technical specification for the full details.**

If the student and their family are a “non-filer” (e.g., no taxes were filed), there is no family size information on the ISIR.

There are three potential locations for family size on the ISIR. Multiple potential locations exist because these fields are populated or not populated based on whether an applicant self-reported financial information (example 1 below) or used the IRS integration to consent to pull in FTI (examples 2 or 3 below) Look for family size in the following locations and in this order:

1. Use the self-reported **Updated Student Family Size** (field 61) or **Updated Parent Family Size** (field 183), unless blank.
2. Use the **Assumed Student Family Size** (field 329) or **Assumed Parent Family Size** (field 330), unless blank.
3. If the fields described in 1. and 2. are blank, then find the family size by calculating the sum of the number of **Exemptions** found in the fields 865, 885, 905, and 925. Use zero for any blank Exemption fields.

Only one of these three is used to calculate the SAI per record. If a record has more than one of these populated, then the first value found of these three locations is the family size used to calculate SAI. For example, if there is a value in both 1 and 2 above, then only the value in 1 applies.

## **Why is “FISAP total income” (field 946) sometimes blank on the 2024-25 ISIRs? (New)**

“FISAP total income” is considered an intermediate value as it is the total of Total Parent Income and/or Total Student Income and only available if calculated in Step 2: Calculate Student Aid Index in the [2024-25 Student Aid Index \(SAI\) and Pell Grant Eligibility Guide](#).

Intermediate values are not always returned on the ISIR. This is clarified on page 4 of the updated [2024-25 Student Aid Index \(SAI\) and Pell Grant Eligibility Guide](#) in the section “SAI for Maximum Pell Grant Recipients.”

One quick way to know if you should expect “FISAP total income” is to look at “SAI Computation Type” (field 21) on the ISIR. If that field is populated, then intermediate values – including “FISAP total income” – will not be populated on the ISIR.

Alternately, look at “SAI Formula” (field 20):

- If this field is populated with “A”, “B”, or “C”, then “FISAP total income” should be populated.
- If this field is null or blank, then “FISAP total income” will be blank.

Read the [“Why are there sometimes blanks and zeroes in Pell and SAI calculations?”](#) FAQ later in this document to learn more about why the SAI Formula may sometimes be left blank.

FSA expects that additional guidance for completing future FISAP forms will be posted to the Knowledge Center according to the Department’s normal publication cycles.

## **Why did I receive multiple ISIRs for the same student?**

Having multiple records for the same student appears to be an import error. Check each ISIR record to ensure it shares the same FPS universally unique identifier (UIID) and information. If it does, you can safely ignore the duplicates.

## **We received ISIRs with school code “000000.” Are these valid?**

State Granting Agencies may receive ISIRs from students who have selected a school that became inactive before FPS processed the application. Because the Department replaces the school code with “000000” when the school becomes inactive, and when there is no cross-reference to a new school, the inactive school on the student’s ISIR will be zeroed. This is consistent with how CPS handled similar situations in prior years.

## **Why is Comment Code 001 missing from the production ISIRs?**

Comment Code 001, "What To Do Next," is not added to any 2024-25 ISIRs and will be removed from the *2024-25 FAFSA Specifications Guide, Volume 7* in the future.

## **What does “Use User Provided Data Only” (field 581) mean? Should we expect to see it on student ISIRs?**

Currently, FPS does not use field 581, and a student’s first ISIR transaction will always have a blank value in field 581. In the future, after the Department has implemented corrections, the value can be changed to direct FPS to process using user-provided data only.

For 2024-25 SAI calculations, FPS maintains all self-reported (or manual) values to accommodate cases where IRS data should be ignored (or replaced) completely. Self-reported tax data **always** trumps IRS data if provided on an SAI calculation. Please review Appendix H in the *Pell Eligibility and SAI Guide* for more details around this rule.

## Why are there sometimes blanks and zeroes in Pell and SAI calculations? Is this expected?

*This is summary response and not a replacement for technical documents that provide further detail on this topic:*

- **2024-25 Student Aid Index (SAI) and Pell Grant Eligibility Guide**, which provides detailed information on the calculation of the SAI.
- **2024-25 Federal Student Aid Handbook, Application and Verification Guide**, Chapter 3.

The SAI and Pell Eligibility determinations are interconnected, which can lead to a handful of cases where the underlying calculation may not be immediately apparent when reviewing an ISIR. We know that a clear understanding of how SAI and Pell Eligibility are calculated and displayed is critical for post-secondary institutions and partners. We have summarized two use cases in response to commonly asked questions about the ISIR here:

### **Common Use Case 1:** Why is there no SAI Formula on some ISIRs with a -1,500 SAI?

The first step in our needs analysis is determining if a student is eligible for a maximum Pell Grant award. Applicants who did not file taxes are assigned an SAI of -1,500; no further calculation is needed. Cases include:

- A dependent student whose parents are not required to file a federal income tax return
- An independent student (and spouse, if applicable) who is not required to file a federal income tax return

In these cases, you will receive an ISIR that does not specify the formula used to calculate the SAI, field 20. The field is intentionally left blank because neither formulas A, B, nor C were used to arrive at the -1,500 SAI. When this happens, field 21 will be populated with the SAI computation type.

### **Common Use Case 2:** When does the SAI use a “lesser of” two values and how does that impact ISIRs?

If a student and any of their contributors file taxes and are still eligible for a maximum Pell Grant award, they are either assigned an SAI equal to 0 or a calculated SAI – whichever is less. This “lesser of” logic applies to maximum Pell indicators 2 and 3 listed in the *2024-25 Student Aid Index (SAI) and Pell Grant Eligibility Guide*.

How to spot if the Department is using the “lesser of” logic when reading an ISIR:

- The SAI Computation Type is either 3, 4, 7, or 8.

If the calculated SAI is less than 0, the student’s ISIR will display:

- A negative SAI value;
- The formula used to calculate the SAI (A, B, or C); or
- The intermediate values from the calculation.

If the calculated SAI is greater than 0, the calculated SAI is discarded. The student’s ISIR will display:

- An SAI of 0;
- The formula is left blank; and



- The intermediate values are zeroed.

## **Will ISIRs include a full middle name? I've only received ISIRs that contain a middle initial.**

For the 2024-25 award year, the middle name field (ISIR field 7) will only contain a middle initial. While the middle initial field can accommodate up to 15 characters, the FSA ID system currently only accommodates a middle initial.

## **How old must a student be to be considered independent?**

The student is considered independent if born before January 1, 2001. This means the Department considers students independent if they turn 24 by December 31, 2024, which is consistent with the logic from prior award years.

## **We received ISIRs with FC (foreign country) listed for the High School State and Country fields. The specs do not list FC as a valid code, so is there a problem with the ISIRs? (Updated)**

No, the specs will be updated to list "FC" as a valid high school state and country value.

## **NSLDS Lifetime Eligibility Used (LEU, field 638) isn't showing a value as expected. How should I resolve LEU and Unusual Enrollment History (UEH) flags? (Updated)**

A student's Federal Pell Grant history is pulled from the National Student Loan Data System (NSLDS). Detailed grant data will only be available once NSLDS starts processing 2024-25 grants. Despite the last three Pell Grant award sequences not being reflected on the ISIR, Pell Lifetime Eligibility Used (LEU) and Unusual Enrollment History (UEH) flags are still triggering correctly on the ISIR. Schools should continue to review and resolve these flags to ensure students are packaged correctly. Schools should continue to use NSLDS online and NSLDS Transfer Student Monitoring (TSM) to obtain a student's most current financial aid history when needed.

## **If there are data issues with production ISIRs, will they be reprocessed and resent?**

Yes. The Department plans to reprocess any impacted ISIRs, which will be processed through a system-generated correction.

## What will happen if I submit a correction before the Department starts processing corrections?

Correction files submitted before the Department starts processing will sit in mailboxes until the Department begins retrieving them from mailboxes.

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## Department tools used to access ISIRs

### How do I install EDconnect 8.6.1?

If you've used EDconnect in the past, you can follow the most commonly used steps as found in the [EDconnect 8.6.1 Plain Language Installation Guide](#). You can also watch the [EDconnect 8.6.1 video walkthrough](#) found on the FSA Training Center.

If you are new to EDconnect or if you require more detailed instructions, please refer to the [EDconnect Installation and User Guide](#).

### I've installed EDconnect 8.6.1 and can receive files from my FT mailbox. Why am I now unable to download files from my TG mailbox? (New)

This is likely one of two issues:

1. Ensure you are switching from FT to TG when logging in.
2. You may have edited or replaced your TDClient.ini for your TG mailbox as found in C:\iam\saig\_temp. This can be resolved by renaming your current TDClient.ini to something like "TDClient.bad" and then renaming "TDClient.bak" to "TDClient.ini".

### I've used FAA Access in the past. Why can't I log into FAFSA Partner Portal (FPP)?

If you have not logged into FAA Access within the past 90 days, your account for both FAA Access and FPP may be disabled. For assistance, please contact the FPS Help Desk (formerly CPS/SAIG Technical Support) at 1-800-330-5947 or by email at [support@fps.ed.gov](mailto:support@fps.ed.gov).

If you have accessed FAA Access within the last 90 days, it is worth checking that you are trying to log into FPP directly from the [FPP homepage](#).