November 10, 2026

SENT VIA EMAIL

Dear Dr. Venezia and Mr. Minor:

On behalf of the Washington Financial Aid Association (WFAA), we are reaching out regarding our concerns over your 2027-28 Income Guidance as sent via email the afternoon of October 28, 2026.

WFAA represents more than 400 financial aid professionals from 80 institutions of higher education, including members from every state aid eligible sector.

The Washington College Grant is one of the most generous state aid programs in the U.S. and is nationally recognized by edtrust as an equitable promise program. In our role as student advocates, WFAA members have championed the expansion of the program and supported the administration of the funding to our students.

This guidance is a *significant departure* from student-centered work and will negatively impact that progress, compounding FAFSA filing inequities documented in WSAC's report "Beyond Educational Access: Inequities from FAFSA Filing to Postsecondary Attainment."

Prior to the 2017-18 academic year, the Department of Education (ED) required schools to verify low income applicants through the V6 verification group, essentially requiring them to prove their poverty level. The data collected by ED verified that these students were not hiding their income and were in fact low income. This resulted in the Department of Education eliminating the V6 verification group after that year and encouraging schools to not require a student to prove they are poor. Additionally with the implementation of the FAFSA Simplification, ED simplified it even further and eliminated the requirement for earned income verification for non-filers. The non-tax threshold levels are $15,750 for a single tax filer or $31,500 for married tax filers, both well within the 0-60% Median Family Income level.

If implemented, this guidance will have access and enrollment impacts across all sectors of our association. At a minimum, this guidance will delay the delivery of financial aid and access to resources to support their basic needs. In the worst case it will deter students from enrolling at all.

We are asking WSAC to urgently consider and engage with WFAA on the following:

- Indefinitely pause the current guidance until further discussion occurs.
- Provide an explanation of why state aid would become more severe and strict than the process for accessing federal aid, as it has been a long practice to align federal and state aid application processes as much as possible, for our most vulnerable population of students.
- Before any decision is made on possible solutions, WSAC provides the following analysis so that we can provide informed consultation:
    - Explanation of the legal analysis
    - Data analysis that includes an estimated number of students impacted by sector and institutional totals.
- As a part of a collaborative process and as possible solutions are identified, ongoing analysis to include:
    - Identifying any possible structural barriers using an equity lens, as stated on Council agenda under "Council Commitment to Equity."
    - Estimates of impacts to colleges work load.
    - Estimates of fiscal impacts on colleges.
    - Estimates of access and enrollment impacts on low-income and marginalized students
    - Analysis and estimates on IT system impacts.
    - Other partners that need to be consulted (in this example, high school counselors).
    - What would the communication of a change require and cost.

Again, we ask that the current guidance is indefinitely paused while you, WSAC, engage in a transparent and collaborative process with your college partners. The timing of the issuing of this guidance is extremely problematic. The 2027-28 aid application was already open when this guidance was provided, which is outside of long-standing practices of working with the community in advance of any significant process change. In addition, there are still outstanding questions and implementation work to accommodate the change with the WASFA that no longer includes a Student Aid Index (SAI). This change was also a significant departure without consultation.

Once this issue is addressed, WFAA also asks that we have an opportunity to share other concerns that this issue has magnified, such as:

- A collaborative working relationship between WSAC and college partners, specifically engagement with financial aid professionals who are the ones that are experts on how state aid is operationalized.
- For the community college sector, a collaborative working relationship with SBCTC on system solutions that reduce manual work.
- A commitment to a timeline for consideration and then implementation of program changes that allows for authentic engagement and sufficient time to prepare for changes. At a minimum, this would require all policy decisions (that are not legislative) to be in place prior to September for the aid year that opens on October 1.

This action without consultation with our community, including the email coming just days after WSAC staff being in person at our annual WFAA conference without covering this issue has created distrust and erodes our confidence of working collaboratively as true partners. We ask for a response to our requests and for a commitment to engage as partners in solving for both the immediate and longer-term concerns.

We appreciate you taking the time to listen to our concerns and look forward to working with you to resolve these issues.

On behalf of the WFAA Membership,



Becky Thompson
2026-27 WFAA President

CC: Isaac Kwakye, Acting Executive Director