**Background**: As of February 14, 2025, question 11 on the FAFSA was revised following the January 20, 2025 <u>President's Executive Order</u> which required the federal government to recognize two sexes: "male" and "female." Question 11 response options were changed to "Male" or "Female." Previous response options also included "Non-binary" and "Prefer not to answer." Additional information is provided in the U.S. Department of Education <u>press</u> release.

Following this change, the Chancellor's Office staff conducted research of federal guidelines to help answer questions posed from colleges and students:

### 1. Is it required for FAFSA applicants to complete the gender question?

Yes, completion of the gender question is required for FAFSA submission. Responses to this question do not impact eligibility for aid and are not shared with institutions.

- February 18, 2025 FSA Electronic Announcement, Implementation of Updated FAFSA Question 11
- 2025-26 FSA Handbook

### 1a. Is a student able to skip the question on the online application?

No, students cannot skip the gender question on the online FAFSA application. The system requires a response of either "male" or "female" to process the application.

- February 18, 2025 FSA Electronic Announcement, Implementation of Updated FAFSA Question 11
- NASFAA News, How ED's Revised Options for Gender on the FAFSA Will Impact the Correction Process

# 1b. If the question is skipped on either the online application or paper form, can this result in an error and/or flag for verification?

On the online application, the system requires a response to the gender question; thus, skipping it is not possible. For paper FAFSA forms submitted after February 14, 2025, the February 18, 2025 guidance indicates that processing will still occur, "regardless of the answer indicated, and will not require a correction. Institutions do not need to take any action." It is unclear if this is inclusive of instances of skipped entry of Question 11. We recommend for students to answer all questions to the best of their ability to avoid a potential processing error.

• February 18, 2025 FSA Electronic Announcement, Implementation of Updated FAFSA Question 11

## 2. If a student changes their gender selection from one year to the next, can this trigger verification?

The gender/sex question is used for statistical and research purposes by the Department of Education and does not affect aid eligibility. Therefore, discrepancies in gender responses across time would not be a factor for aid distribution or calculation and would not be rationale for verification.

For each award year, the Secretary of Education publishes in the Federal Register a list of the FAFSA information that an institution or applicant may be required to verify. The 2025-26 variant, published, September 9, 2024, does not indicate gender or sex.

- NASFAA News, How ED's Revised Options for Gender on the FAFSA Will Impact the Correction Process
- FSA Handbook 2025-2026 Application and Verification Guide
- <u>Federal Register, Free Application for Federal Student Aid (FAFSA) Information To Be</u>
  Verified for the 2025-22026 Award Year

# 3. Students and parents are required to create an FSA ID to complete the FAFSA. Does FSA ID require an individual to indicate their gender? And if so, is it required for the FSA ID and FAFSA gender selections to match?

The FSA ID creation process does not have a field for gender or sex. Consequently, there is no requirement for the gender selections on the FSA ID and FAFSA to match.

- FSA Handbook 2025-2026 Application and Verification Guide
- FSA Video Guide, How to Create an Account Username (FSA ID) for StudentAid.gov
- FSA Creating and Using the FSA ID

### 4. Are students required to use their legal name for completing a FAFSA?

Yes, students must use their legal name as registered with the Social Security Administration (SSA) when completing the FAFSA. This would be the equivalent as read on the students' social security card. This ensures that the student's information matches SSA records; if there is not a match, this may cause delays and/or the need to correct the input with the SSA.

FSA Handbook 2025-2026 Application and Verification Guide

## 5. What if students already submitted a 2024-25 or 2025-26 FAFSA form before February 14, 2025 indicating "non-binary" or "prefer not to answer" for Question 11?

No action is required by the student or institution, regardless of response to question 11.

• February 18, 2025 FSA Electronic Announcement, Implementation of Updated FAFSA Question 11

# 5a. What if a <u>STUDENT</u> initiates a correction to the 2024-25 or 2025-26 FAFSA form from before February 14, 2025?

If a student attempts to submit a correction for any item on their 2024-25 or 2025-26 form and they previously indicated "Non-binary" or "Prefer not to answer," they will be required to also answer the updated question 11 to resubmit the FAFSA form.

• February 18, 2025 FSA Electronic Announcement, Implementation of Updated FAFSA Question 11

## 5b. What if an <u>INSTITUTION</u> initiates a correction (e.g. verification, professional judgement, etc) to the 2024-25 or 2025-26 FAFSA form from before February 14, 2025?

"Corrections that are initiated by institutions, regardless of method (FAFSA Partner Portal or EDE), will not require an updated response value to be entered, regardless of the student's previous answer to question 11."

 February 18, 2025 FSA Electronic Announcement, Implementation of Updated FAFSA Question 11

While the FAFSA form includes responses to the student's gender, race, and ethnicity, these fields are not accessible by the institution nor included in the ISIR. "They are not included in the FAFSA Partner Portal or correctable by the FAA. These fields are included on the FAFSA Submission Summary and are only correctable by the student."

FAFSA Specifications Guide, Volume 6 – ISIR Guide, 2025-26, November 2024