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To: Institutional Research Offices  
From: Barbara Schmertz, Director of Office of Research and Policy Analysis  
Ann Kellogg, MLDS Director of Reporting Services  
Parris Jackson, Director of Information Technology  
CC: Ann Kellogg, MLDS Director of Reporting Services  
Subject: Changes to the federal FAFSA data and the Financial Aid Information System Collection (FAIS)  
Date: June 10, 2025

This memo outlines the forthcoming short- and longer-term changes that the Maryland Higher Education Commission (MHEC) will be implementing for the FY 2026 collection cycle (with a submission of the FY 2025 Financial Aid Information System (FAIS)). These changes are a result of the significant federal changes to the FAFSA form and definitions.

**Collecting and reporting FAFSA data via the Higher Education Act**

MHEC's legal counsel as well as our review of existing guidance confirms that institutions can share FAFSA data with state agencies. MHEC's ability to have and use the data falls under the Research exception. See the *Use of FAFSA Data for Research* sections in the links below.

**Data MHEC will no longer collect:**

The FAFSA simplification process resulted in several FAIS variables that MHEC may no longer collect and those that institutions are not permitted to share. Effective immediately, the variables below will no longer be collected:

- |  |                      |
|--|----------------------|
| 1) Family Size (# of Dependents), DD78       | FAIS Layout Item #15 |
| 2) Effective Family Contribution (EFC), DD81 | FAIS Layout Item #18 |
| 3) Adjusted Gross Income (AGI), DD83         | FAIS Layout Item #20 |
| 4) Commuter Status, DD80                     | FAIS Layout Item #17 |

Items 1 and 3 are considered "Federal Tax Information (FTI)" and MHEC has interpreted the current guidance to reflect that the agency can no longer receive the data from institutions. Items 2 and 4 are no longer being collected on the FAFSA and therefore MHEC will no longer be collecting them in FAIS.

**Action:** MHEC will retain the space for each item in the FAIS layout, meaning each data definition (DD) will remain in the layout. Upon submission, each field must be populated with a value that identifies the field as discontinued.

**Derived variable MHEC will collect:****MARYLAND HIGHER EDUCATION COMMISSION**

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The derived variable that institutions use from the FAFSA that MHEC is allowed to collect is:

1) Student Aid Index (SAI), DD175

FAIS Layout Item #35

**Action:** SAI is in the existing FAIS file layout as a required data element to be reported for the 2024-25 collection year. MHEC will make clear in documentation that this variable is to be reported by institutions.

**Changed variable:**

FAFSA simplification has resulted in the level of education previously defined with two variables for two parents to be reported as a single value for both parents. The first of the two variables, DD142, will be modified to comply with the simplification. DD143 will be discontinued.

1) Parent Education Status, DD142 modified

FAIS Layout Item #11

2) Parent 2 Highest Grade Level Completed, DD143

FAIS Layout Item #12

**Action:** MHEC will make necessary adjustments to document changes related to the new options for DD142 in the data definition and will make clear how the file layout for the variable will change. For the 2024-25 year, DD143 must be reported as “9” meaning “No longer collected.”

**Overall FAIS Updates:**

Effective with the 2024-2025 FAIS submission, these updates and adjustments will be implemented. Further details regarding these variables will be provided in the annual Data Collection memo. MHEC recognizes that these changes will require some adjustments to institutional code and data extraction protocols. Our goal is to implement short- and longer-term solutions to ensure we maintain high data quality. More substantial changes are planned in the future to streamline the system and reformat the layout.

For questions or concerns, please contact MHEC via [mac2help.mhec@maryland.gov](mailto:mac2help.mhec@maryland.gov).

**Links**

US DOE Federal Student Aid - [https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-11-07/guidance-state-grant-agencies-and-institutions-higher-education-access-disclosure-and-use-fafsa-data-application-award-and-administration-student-aid-programs#:~:text=If%20the%20state%20grant%20agency,other%20entities%20\(e.g.%2C%20other%20state](https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-11-07/guidance-state-grant-agencies-and-institutions-higher-education-access-disclosure-and-use-fafsa-data-application-award-and-administration-student-aid-programs#:~:text=If%20the%20state%20grant%20agency,other%20entities%20(e.g.%2C%20other%20state)

NASFAA - [https://www.nasfaa.org/news-item/35025/ED\\_Releases\\_Guidance\\_on\\_Access\\_Disclosure\\_and\\_Use\\_of\\_FAFSA\\_Data](https://www.nasfaa.org/news-item/35025/ED_Releases_Guidance_on_Access_Disclosure_and_Use_of_FAFSA_Data)

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