#	Original Document ID	Comment	Category	Sub-Category	Response
1	ED-2015-ICCD-0138-DRAFT-0004	The proposed requirements for applicators are excessive, inconvenient and unnecessary. I administer tests through the Extension Office. Successful people can struggle with written tests. They have common sense and know how to find answers if they're not certain. They're careful and protective of their livelihoods. They can demonstrate chemical handling, mixing, application and storage. They consult agronomists or Extension professionals (or a book) if they have questions. Forcing the memorization of information for a test does nothing to guarantee that they know what they're doing in real-life scenarios. Many of our applicators are farmers and ranchers. When are they available to attend trainings? It depends on weather conditions, calving season, planting, haying and harvesting. Few of our applicators have the luxury of an 8-5 job. When nature permits or their animals need them, they work. They can't stop because a training is scheduled. Their animals could die, their crops may miss planting deadlines, hay can dry out and yields can suffer if they don't cooperate with Mother Nature's schedule. Many applicators are forced to test or attend trainings a great distance away. The proposed regulations will cause more to disregard trainings and certification and risk being caught and fined.	Out of Scope	Unrelated	This comment does not appear to be related to the Enterprise Complaint System.
2	ED-2015-ICCD-0138-DRAFT-0005	I am weary that this may produce many complaints about schools that are genuinely doing their job as established by federal regulations, but it does appear that there will be review of each complaint made.	Processes	Administrative Burden	Complaints will not be automatically routed to institutions for review or response and will be contacted regarding a complaint only if contact is necessary to provide satisfactory resolution to the customer.
3	ED-2015-ICCD-0138-DRAFT-0005	One comment I did have is the log in options, I honestly believe that one of your largest complaints will be regarding the FSA ID process and the schools lack of ability to assist through this process. The FSA ID website is incredibly difficult to use for anyone that may lack computer skills, or someone which English is not their first language. Though there are options for logging in without the FSA ID, some of these individuals who are having trouble using the FSA ID may want follow-up but may be unable to use that function.	Security	Authentication	In order to ensure access for all customers, FSA has provided an option for users to submit complaints without needing to log in via their FSAID. Although for security reasons, these customers will not be able to view the status of their complaint via the online portal, they will be able to check the status via phone when telephony capability is implemented in July 2016.
4	ED-2015-ICCD-0138-DRAFT-0006	In setting up a complaint system the site should look like the Ombudsman site, with pull down menus, but it should also include a space for other. On the Ombudsman site not all loan types are listed--the spousal consolidation loan. ED must address the servicing of these loans in its complaint site.	User Experience	Complaint Types	The complaint submission form is modeled, in part, on the existing Ombudsman system. In order to ensure that customers are provided with timely and relevant responses to their feedback, the system is designed to allow customers to categorize their complaints in an accurate and precise way. Information that is not captured by the categorization itself (e.g., type of loan, such as the spousal consolidation loan mentioned) can be provided in the free-form text description of the complaint.
5	ED-2015-ICCD-0138-DRAFT-0007	Here is a problem that a student deal with a lot regarding student loans. I got student who rehab her loan in August 2015. The loans are no longer in default. The loans get transfer to Navient in September 2015. On NSLDS, it show that the loan was transfer to Navient from Debt Management in Ausgust 2015. However neither of them took the time to update the loan status on NSLDS. The loan status is still showing default as of 2014 but it is Jan 2016. Even thought you see the loan was rehab in August 2015. As a school, I am not able to give this student Title IV without a default clearance letter from servicer being reported. Now it is January 2016, I called Navient, Navient said they can't give me letter because the student is not in default. I have to get the letter from Debt Management. I call Debt Managment and they say to me they can't give me letter because student no longer in their system. I am not able to get letter tell a school, it is ok to give a student Title IV. I did called back to Navient asking them to have their NSLDS team to review the student's account. Unfortunely, this review can take a while because the request is in a waiting line with other requests. I called NSLDS. To see if I can submit a ticket to get someone to look at the student's account on NSLDS. However, NSLDS won't submit a ticket because I do not have proof that their is issue. After I explain to them to look at NSLDS. They can see the issue. Why can't NSLDS asks Navient to review this account without proof. A student is not able to call NSLDS and ask them this. What does a school do next to help the student? At this point I have the student contact Ombudsman. There is nothing else I can do for the student until this issue gets resolved. I deal with this a lot. Where no one wants to help the student to resolve an issue that is NOT the student fault. I know I do more than normal school will do. How is a student able to submit a complaint? I do tell student about the FSA Ombudsman. This information is not noted on any of the third party website (or find it eas. It is like you going to store. Where you can find a customer Services number to make complaint or get a manager name. You are not able to do this with FSA loans. Student do not know they are able to submit a complain with Ombudsman. Usually I direct the student tell the loan servicer or third party that they will submit a complain with Ombudsman after an issue has not been resolved in 90 days.	Out of Scope	Personal Complaint	Customers will be able to submit complaints related to their loan status. Additionally, authorized individuals may submit complaints on behalf of customers if desired. For example, financial aid administrators may submit complaints on behalf of students.
6	ED-2015-ICCD-0138-DRAFT-0007	If there is a new website for complain regarding Title IV, the department must make sure the information can be located on ANY third party website, letters or any kind of social media site. This goes for any schools that handles Title IV. Currently, there is a place for complain but student do not know where to find it. How to use it? Submitting a FSA complain is not something a parent teach his or her child.	Communications	Marketing	FSA will launch a multi-faceted communications and outreach plan prior to formal implementation on July 1st, 2016, to ensure that ECS can be easily found by customers.
7	ED-2015-ICCD-0138-DRAFT-0007	Overall, make the complaint process simple, please include video on how to submit a complaint. Make sure that all schools and third parties has a designate person who will handle the student complaint for their party. These designate is available. Designate person must response back to the students with 48 hours, even if it is a confirmation that complaint has been received. There should be a time limit on when a complaint should be closed.	Communications	Marketing	FSA will explore ways to develop video tutorials on using the complaint system as part of the ECS communications strategy.
8	ED-2015-ICCD-0138-DRAFT-0007	Last thing... A lot issue would be resolved if NSLDS was update correctly by all parties especially Debt Management. The service has gotten worst when the third party servicer switch back in Oct 2014 regarding default loans.	Out of Scope	Other Business Unit	This comment has been provided to the appropriate unit within FSA for review.
9	ED-2015-ICCD-0138-DRAFT-0008	The system looks great! It seems very straightforward and user-friendly. As an administrator it is great to see that the Centralized Student Complaint System works to focus student feedback through the structure of questions.	Context	Context	Thank you for your comments.
10	ED-2015-ICCD-0138-DRAFT-0009	I want to provide details of my current situation with my student loans so that you understand what the shortcomings are with the Ombudsman complaint process now, and that hopefully can be better addressed by this new system. I graduated law school May 2012. In November 2012, it was time to repay my loans so I consolidated them all to go into the IBR, Income based repayment plan. I used the fedloans website and did everything online. I have been paying under IBR since then. After being with Sallie Mae for some time, my loans are now serviced by Navient. In October 2014, I get an email from a new servicing company Nelnet, I thought my loans were switched to them but it was a statement for a little over 3K direct loan that was supposedly disbursed 2/2012? I call them and tell them this isn' me my loans have been consolidate for 2 years, they say yes, name my correct law school etc. I check my list of loans on the student fed loans list again and this Nelnet Loan is nowhere on the list of loans disbursed to me. It was never there. so I file an ombudsman claim November 2014 and explain, how can this random 3K loan appear over 2 years after I graduated? Ombudsman takes a few weeks then tells me, yes, this loan was not on your list when you consolidated. They first suggested I just re-consolidate to include the 3K. I informed them I would been paying under IBR for over 2 years so I couldn't re-consolidate because i would lose out on all the payment credits I had made since then (thank god I knew this!!!) So they said okay, we will work on it. It has been pending since then. Meanwhile, Nelnet is charging me $50 a month, they tell me it's not their problem if i'm disputing it and I still owe them. I've had to request a forbearance every 3 months for over a year now, because I shouldn't have to pay $50 on top what I pay on my IBR. It's not my fault the 3K loan wasn't included. Ombudsman has done nothing to help me with this, I've told them and asked if they can somehow force Nelnet to freeze the acct. for now so I don't have to do this but they just tell me they'll see and talk to Nelnet but I literally just had to apply for another forbearance today. If I don't' do it, I'll default and then it will affect my credit. I spoke to Ombudsman last month, after bugging them multiple times for an update, and I was told that they are working on it, possibly having the Nelnet 3K amount just forgiven but that it's an unusual situation. I don't know what else or who else to go to. I'm afraid they will consolidate and ruin my Public Service Loan Forgiveness. I don't make a lot of money and the Public Service Loan Forgiveness is the main reason why I was able to commit to the work that I do.	Out of Scope	Personal Complaint	The personal complaint provided in this public comment has been provided to the Ombudsman team for review.
11	ED-2015-ICCD-0138-DRAFT-0009	There is no way to track the status of my claim online, it's hard to get a hold of someone and there seems to be nothing the Ombudsman office can do to stop Nelnet, how is this possible if they are Dept. of ed loans? I don't understand what they are able to do, no one has explained it to me. There needs to be access to information as to what is happening. It would also alleviate stress if the Dept. of Ed. has the ability to stop/or freeze the account that has the pending complaint.	Out of Scope	Personal Complaint	Authenticated users will be able to track the status of their claim online within the ECS portal. Unauthenticated identified users (i.e., non-FSAID users) will be able to check their status via phone upon implementation in July 2016.
12	ED-2015-ICCD-0138-DRAFT-0010	Having 31+ years of financial aid experience, this seems like the most ridiculous thing I ever heard. Our jobs are made so difficult already by the websites we need to negotiate to do our jobs (like the 8 or so steps just to log in to NSLDS)...if this happens, I can see students who file their FAFSA's late are going to complain and the schools will need to be responding. Our jobs are already made so difficult by the complexity that exists, all the data that gets reported, the overdue layers of security needed to enter federal government websites, who do we complain to?	Processes	Administrative Burden	Complaints will not be automatically routed to schools for review or response and will be contacted regarding a complaint only if contact is necessary to provide satisfactory resolution to the customer.
13	ED-2015-ICCD-0138-DRAFT-0011	Consumer Action, on behalf of low--- and moderate---income, limited---English---speaking, and other underrepresented consumers nationwide, is very pleased to learn that the Department of Education (ED) is planning to build a Federal Student Aid complaint system (referred to as Enterprise Complaint System or ECS) that accepts students' complaints, compliments and reports of suspicious activity regarding students' schools, federal loans and other types of financial aid. We are also pleased to learn that the Department of Education intends for its ECS to be written in both Spanish and English, and will accept complaints online, by phone or chat in both languages. The option for complainants (or customers) to auto---fill their contact information by entering their Federal Student Aid (FSA) ID should make the process more efficient. We are very encouraged to see that the Department is committed to seeing that borrower complaints are resolved. We offer several recommendations to assist the Department in building a complete, transparent and useful tool that will benefit students, their families and the public in the future.	Context	Context	Thank you for your comments.
14	ED-2015-ICCD-0138-DRAFT-0011	1. Complaint resolution should be meaningful. A responsive student feedback system that documents complaints and requires action from contractors, schools or other third parties and provides deadlines for resolution is one that student borrowers are in desperate need of. Complaint resolution does not mean simply documenting borrower problems for the Department's records or providing policymakers with feedback. Examples of meaningful resolution include, but are not limited to: elimination of unfair penalties and fees; reimbursement of unfair penalties and fees collected; corrections to credit reports; corrections to student loan balance records; loan servicer application of prepayments and underpayments to the benefit of the borrower; and notification and enrollment of borrowers into income driven repayment plans for which they qualify.	Processes	Complaint Resolution	The complaint system is not intended simply to collect data. It is designed to provide meaningful resolution that does resolve specific borrower issues whenever possible.
15	ED-2015-ICCD-0138-DRAFT-0011	2. Increased school and contractor accountability should be the primary goal of the ECS. While we appreciate that the stated proposal intends to improve customer experience for filing feedback, simplify the process of filing complaints and improve the analytical and reporting capabilities, the ECS must incorporate increased accountability and transparency from schools, lenders and servicers, so that loan problems can be settled and students and their families may make informed decisions about their education and finances. Ensuring that each party involved in the loan process (school, servicer, lender, collector, FSA and Department of ED) is responsible for resolving borrower complaints would be the kind of "responsive student feedback system" that borrowers are seeking and that the President has committed to.	Processes	Complaint Resolution	One of the primary goals of the ECS is to drive operational enhancements related to the administration of Title IV aid programs, which includes ensuring and increasing accountability among participants in the Title IV environment. Customers may submit complaints regarding the entities identified in this comment.

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ED-2015-ICCD-16 0138-DRAFT-0011	3. Well defined timelines for actions and deadlines for resolutions are needed. We support a system that starts with an automatic email confirmation upon receiving a borrower complaint. Specific timelines detailing concrete actions, including response and resolution deadlines from third parties (schools, servicers, lenders, collectors, etc.), should also be part of the ECS auto response process. We recommend that each phase of the complaint process be spelled out in a step‑‑by‑‑step format so that student loan borrowers know what they can expect from each party, with a clear timeline for response and resolution. For example, within 48 hours of filing a complaint, complainants should receive email notification from Federal Student Aid that their complaint is being processed, with details of next steps, or that it has been re‑‑directed to the appropriate government agency (with contact information included for that entity and a case number or complaint ID). Any third party involved in the complaint (school, lender, servicer, collector, etc.) should respond within 15 calendar days (30 for the most complex cases) to "customers" and to FSA directly with information on how it has resolved (or intends to resolve) the problem. The Department should use its authority with contractors to ensure that complaints are resolved within a 60‑‑ day timeframe for all but the most difficult complaints. If there is an extenuating reason why a problem cannot be resolved within that period, a specific timeframe and action plan for resolution should be provided. FSA should ensure that complaint status is automatically updated in the ECS, including contractor responses. Student borrowers should be offered the opportunity to add new complaint details to the database, so that FSA can track the progress or breakdown of issues. In the event that a complaint remains unresolved after 60 days, it should be transferred to the Department of Education's Ombudsman's office for timely resolution. Consumers should be notified of this advancement and sent Ombudsman contact information (in addition to a case number or complaint ID) so that borrowers may follow up on their case. The Ombudsman's office should release a detailed, public report on complaint outcomes on escalated cases (broken down by contractor and complaint type) at least semiannually.	Processes	SLAs	An automatic email confirmation will be provided to customers who provide their contact information. When the status of a complaint has changed (e.g., the complaint has been forwarded to another unit within FSA for follow-up), this change will be reflected in the case management tool and the customer will receive an email detailing information about this step. In this way, the customer will be able to determine where their complaint is in the response process.
ED-2015-ICCD-17 0138-DRAFT-0011	4. The ECS should be a publicly searchable complaint tracking system. We strongly recommend that all complaints received become part of an easily searchable public database. As currently proposed, the public will not be able to see or track complaints sent to the Department of Education. Consumers value a user‑‑‑friendly, searchable system that can be used to analyze performance by contractor or school. The Department of Education should use the ECS database to produce semiannual detailed, public reports that include complaint types and outcomes (broken down by school, lender, servicer, etc.) so that trends may be captured and the actions of schools and student loan servicers may be accurately assessed. A comprehensive public database should also include voluntary consumer complaint narratives. Consumer narratives are the heart of the complaint. They explain why a borrower is pursuing a problem, using individuals' firsthand experiences to allow others to understand the issues, put the problems in context and identify harmful patterns that may be common to many borrowers. Consumer Action supports a complaint system that balances transparency for consumers with privacy protections for individuals.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
ED-2015-ICCD-18 0138-DRAFT-0011	5. Improved interagency connectivity is key. The public ECS should be connected to the Federal Trade Commission's Consumer Sentinel so that federal and state agencies have immediate access to all complaints filed. Connectivity should extend to other government agencies, such as the Consumer Financial Protection Bureau (CFPB). This is also useful for consumers who mistakenly submit private student loan complaints to the Department and will need follow‑‑ up assistance from the CFPB. The Department should be tracking and publicly reporting on all student complaints, regardless of where they are submitted, to ensure that ED is compiling the widest breadth of data possible on schools, loans and other types of financial aid, and debt collection activity on its behalf. Alternatively, all student loan servicing complaints (federal and private) could be collected and tracked by the CFPB's current system, then all federal complaints could be forwarded to ED for resolution. This process has worked successfully with the CFPB forwarding federal debt collection complaints to the Department when received by the Bureau's complaint system. 6. Complaint referrals automatically transferred to relevant government agency. Complaints or reports of suspicious activity that are within a third party's jurisdiction should be referred directly and seamlessly to that entity, whether a state or federal agency (Federal Trade Commission or CFPB) or accreditor.	Collaboration	CFPB, FTC	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel, and the Consumer Financial Protection Bureau.
ED-2015-ICCD-19 0138-DRAFT-0011	Similarly, the CFPB's complaint system currently forwards federal loan servicing complaints to the Department of Education. Data collected on the consumer's entry should be retained in the ECS database before FSA automatically redirects the problem to the appropriate entity. FSA should contact the consumer (within 60 days of receipt of the complaint) to learn if the problem has been resolved and if the customer was satisfied with the outcome.	Collaboration	CFPB	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel, and the Consumer Financial Protection Bureau. FSA plans to develop a process to capture customer satisfaction in a near-future release.
ED-2015-ICCD-20 0138-DRAFT-0011	7. Consumer resolution needed to close complaint. A case should not be closed until a complaint is resolved. The Department should explain to each contractor its specific obligations to resolve borrower complaints in a timely manner (30‑‑ 60 days) and outcomes should become part of a permanent public complaint database. The Department of Education should ensure widespread agency staff review of all complaints, with special attention to problems where consumers remain dissatisfied.	Processes	Complaint Resolution	In addition to providing resolution of individual complaints, the system will use collected data to identify trends and drive enhancements to contractor accountability and Title IV operations.
ED-2015-ICCD-21 0138-DRAFT-0011	8. Some technical components of the tool could be improved. The following suggestions are for the development of the ECS tool itself: a. Consumers submitting complaints without using an FSA ID should be prompted to present their complaint details before they enter their identifying information to help maintain "customer" engagement and ensure complete submissions.	User Experience	Submission Flow	Because some functionality, including the use of chat as a support channel, is only available to customers who log in with FSAID, customers are asked to select their log-on method and input data first in order to ensure that they can be provided with as much support as possible during the complaint submission process.
ED-2015-ICCD-22 0138-DRAFT-0011	b. All entries that are submitted without an FSA ID should be provided with an alternative way to for complainants to make changes, add documentation and review their complaint status online.	Security	Authentication	In order to ensure that customers' personally identifiable information is protected, ECS has been designed to prioritize information technology security. For this reason, customers who do not provide an FSAID are not able to use the online case management functionality. However, they will be able to manage and track their cases via phone beginning in July 2016.
ED-2015-ICCD-23 0138-DRAFT-0011	c. The words "complaint" and "compliment" are too similar and may prove confusing for those who do not speak English as their first language. We recommend changing the word "compliment" to the term "positive feedback," or eliminating it altogether.	User Experience	Compliment	FSA will replace the word 'compliment' with a synonym that is more user-friendly.
ED-2015-ICCD-24 0138-DRAFT-0011	d. Many customers will be using mobile devices and smartphones to make ECS submissions instead of computers. Enhancing smartphone capability is a must for any useful ECS tool. Thank you for the opportunity to comment on the development of a Federal Student Aid complaint system. We look forward to seeing a final product that proves to be a useful, transparent tool that will greatly benefit students, their families and taxpayers.	User Experience	Mobile	The complaint system will be optimized for mobile devices.
ED-2015-ICCD-25 0138-DRAFT-0012	My first suggestion is to echo one of the many fine points raised in Alegra Howard/Consumer Action's letter to the Secretary: This complaint system MUST be publicly-searchable. I think by now we understand that the majority of problems that exist in our Title IV system today stem from people (e.g. students, parents, administrators, servicers, and government representatives) simply not having had access to the information they needed to make informed decisions.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
ED-2015-ICCD-26 0138-DRAFT-0012	Providing a College Scorecard has been a great way to facilitate informed decisions about schools, but there is no Servicer Scorecard, which is my second suggestion. New graduates ask me all the time how to choose a consolidation servicer when they've only had a handful of contacts with their existing servicers and no resources to research how their experiences might compare with others. Having worked in loan servicing, I have seen countless ways that big data can be manipulated to make situations appear different than what they are. In my opinion, rather than Ed awarding contracts based on what essentially amounts to servicer self-reporting, contracts should be awarded based on the feedback received by this proposed complaint system.	Out of Scope	Other Business Unit	The suggestion regarding a Servicer Scorecard has been provided to the appropriate unit within FSA for review. FSA will explore ways to incorporate complaint data into processes that ensure accountability.
ED-2015-ICCD-27 0138-DRAFT-0012	Each servicer should also be required to link to the complaint website from their homepage without making the borrower log in first or jumping through other hoops. It's the only way to ensure ethical servicing.	Communications	Contractor Communications	Replacing servicer complaint processes with the single process under ECS is an important near-term goal of the system. In order to ensure a stable user experience for customers, implementation of this change is pending analysis of ECS' performance in a more limited context.
ED-2015-ICCD-28 0138-DRAFT-0012	A third suggestion: A separate area/policy that specifically deals with old bank records. Since 2014, there has been an upsurge in borrowers receiving collection notices and being wage-garnished for defaulted loans. In some cases the borrower remembers paying the loan off, but because banks bank no longer retain older records, the borrower can't prove they paid and the lender/collector can't prove they didn't. As Ed continues to pursue these older defaulted loans, banking institutions will continue to archive their financial records. There should be a formal policy/procedure for how to address older disputed payment situations when neither party can provide documentation - a process which does not simply assume that the borrower is always wrong.	User Experience	Complaint Types	Customers will be able to submit complaints related to bank records. Currently, customers may submit their information to the Ombudsman for research, review, and resolution.
ED-2015-ICCD-29 0138-DRAFT-0012	A fourth suggestion: A dedicated area/specialists for Perkins loans. There is only one way to say it: the Perkins program is a hot mess; and all the problems that exist with FFELP/DL servicing are magnified about a trillionfold with a loan program that by law must be administered by schools, collection agencies, and third-party companies that lack the knowledge and resources of larger loan servicers. In addition, many rules are different for this loan program and it causes a lot of confusion. Please, please do not underestimate the amount of time and expertise it takes to research Perkins issues.	User Experience	Complaint Types	Customers will be able to submit complaints related to Perkins loans. Perkins complaints will be worked by individuals who are experts in the Perkins program and related issues.
ED-2015-ICCD-30 0138-DRAFT-0012	Finally, I'd like to discuss Administrative Burden. Over the last two decades, university systems across the world have doubled and tripled their administrative budgets, but without enrolling more students. The reason is that for service industries like Education and Healthcare, "human interaction" is the end product. Back in the days of snail-mail, a financial aid administrator would receive maybe 30 calls/letters a week and we had an 8-hour workday. Now that anyone can send an email at any moment from wherever they are, that same administrator gets 1000 emails a week, and we are all expected to do the work of three people, stay late, come into work sick, and still be on-call during sick/vacation days. The IT department didn't exist at any school until years after the Internet arrived, nor did all the computers, wi-fi, and digital technology that also fall under an institution's administrative budget. So schools keep hiring more and more administrators to try to keep up with the work and equipment demands brought on by technology, but in spite of cutting other costs (e.g. part-time faculty, online classes), it's a losing battle - so schools cut free aid and increase tuition. My point about administrative burden is that this proposal assumes that technology may in some cases decrease the administrative burden; when in fact technology has created a juggernaut of an administrative burden in our field that is only getting worse. And it is precisely this administrative burden which is a primary factor in the student loan bubble, because it caused education costs EVERYWHERE to skyrocket while simultaneously eliminating schools' ability to guide families through what was already a predatory loan market. It is my sincere belief that at a minimum, you should triple the number of complaints you anticipate receiving monthly to at least 10,000, especially if this system is launched all in one shot and will also encompass all the Title IV programs.	Processes	Administrative Burden	Complaints will not be automatically routed to institutions for review or response and will be contacted regarding a complaint only if contact is necessary to provide satisfactory resolution to the customer.
31 ED-2015-ICCD-0138-0013	Consumers Union, the advocacy and policy division of Consumer reports, respectfully submits comments on the Department of Education's ("Department") proposed Enterprise Complaint System ("ECS"). We applaud the Department's efforts to build a comprehensive and responsive complaint system that will allow dissatisfied consumers to file complaints and track grievances against lenders, servicers, collection agencies, colleges and universities. We believe that a centralized public complaint system is a critical oversight tool that helps to inform the public and regulators about harmful practices, targets enforcement and supervision priorities and provides relief to those who have been harm or have had their complaints ignored or left unresolved. We offer the following recommendations to aid the Department in developing a complaint system that will give consumers a simple and straightforward way to file complaints. • To ensure transparency and accountability, the ECS should be a user friendly, publicly searchable database. All interested parties should be able to search, track, sort, compare and download data. Consumers should be able to review and evaluate complaints to learn if a particular school, lender or other participant in the education marketplace engages in harmful practices or is likely to resolve their problem.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
32 ED-2015-ICCD-0138-0013	• We are pleased that ESC materials will be written and complaints accepted in both Spanish and English. We are also pleased that complaints will be accepted online, by phone or chat. However, we strongly recommend that written materials including forms, subject matter expertise and translation services be provided in other languages. For example, the Consumer Financial Protection Bureau ("CFPB") currently accepts complaints in over 180 languages.	User Experience	Languages	While language support beyond English and Spanish is not planned for system implementation on July 1st, 2016, FSA is exploring options for additional language capabilities in future releases.

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33	ED-2015-ICCD-0138-0013	• The ECS should include as much complaint data as is available on schools, loans, student aide, servicers and collection activities from as many sources as possible. To that end, ECS data should be uploaded and the Department should have full access to the Federal Trade Commission's Consumer Sentinel and other databases to make the ECS database complete and robust. Similarly, CFPB and other federal and state officials should have real time access to the ECS database to help inform their work and coordinate supervisory and enforcement efforts.	Collaboration	CFPB/FTC	Complaint data forwarded to FSA from the Consumer Financial Protection Bureau will be included in the ECS.
34	ED-2015-ICCD-0138-0013	• The ECS should include and publicly disclose voluntary complaint narratives. Narratives put the complaint in context and promote transparency. They provide timely first-hand information in the student's own voice about what went wrong, the harm caused and the impact of that harm. Narratives would also provide the Department with valuable information that will help identify harmful trends before they become widespread. Other well established federal complaint systems, most notably those at the CFPB, the Consumer Product Safety Commission and the National Highway Safety Administration (NHTSA), include voluntary narratives in their complaint databases. In addition, as alluded to above, consumers should be required to give their informed consent to go public with their complaint. They should be allowed to withdraw their consent at any time and have their narrative removed from the database.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
35	ED-2015-ICCD-0138-0013	Finally, the database should not include confidential information about the consumer's identity. Steps should be taken to protect consumers' personally identifiable information.	Security	Data Protection	Security of personally identifiable information is a key requirement of the complaint system. It has been designed in accordance with Federal and Departmental standards for ensuring enterprise data protection.
36	ED-2015-ICCD-0138-0013	• Complaint resolution should be the Department's primary goal and should include much more than tracking a student's problem. The Department should review all complaints with the eye toward spotting patterns of problems and should hold third-parties (i.e. servicers, debt collectors and others) accountable for resolving the problems reported. Special attention should be given to those complaints where the consumer remains dissatisfied with the resolution. Complaints that remain unresolved after a set period of time (i. e. 60 days; see CFPB complaint system for guidance) should be redirected to the Department's Ombudsman's office for swift and final resolution.	Processes	Complaint Resolution	In addition to providing resolution of individual complaints, the system will use collected data to identify trends and drive enhancements to contractor accountability and Title IV operations.
37	ED-2015-ICCD-0138-0013	Consumers should be notified when their complaint has been referred to the Ombudsman's office and provided with appropriate contact and file identification information. Most importantly, complaint resolutions should include, among other things, reimbursement of monies paid including fees and penalties, corrections to credit reports, corrections of loan balances, supervisory or enforcement action as warranted and any other restitution deem appropriate.	User Experience	Notifications	When appropriate, complaints will be transferred to the Ombudsman for escalated review and the customer will be notified.
38	ED-2015-ICCD-0138-0013	Finally, similar to the CFPB's database, consumers should be able to access their complaint online to receive updates, provide additional information and review the responses received.	User Experience	Case Management	Authenticated users will be able to track, update, and manage their complaints via the complaint portal.
39	ED-2015-ICCD-0138-0013	• The Department should explicitly define all third- parties' obligations to resolve consumer complaints in a timely manner as specified by the Department. Complaint resolution obligations should be prominently posted in plain easy to understand language on the third-party's website and the Department's website.	Processes	SLAs	Language will be added to ECS when formal obligations have been defined.
40	ED-2015-ICCD-0138-0014	This draft comment is in reference to the proposed implementation of an enterprise complaint system. As part of the President's vision for a student's bill of rights and the right to quality customer service, the Department of Education plans to develop a comprehensive enterprise complaint system. The web portal system will launch and provide students and borrowers a simplified way to file complaints and provide feedback about federal student loan lenders, servicers, collections agencies, and institutions of higher education. While we agree that students need an easy and straightforward mechanism to communicate complaints, compliments or report suspicious activity, we believe federal student aid must consider the complaint process and how agents will be interacting with institutions of higher education regarding these claims:	Context	Context	Thank you for your comments.
41	ED-2015-ICCD-0138-0014	• The increase in administrative burden: The 2015 NASFAA Administrative Burden Survey results indicated the belief that students attending institutions of higher education are likely experiencing reduced access to financial aid services due to a continued increase in the administrative burden in the administrating of financial aid programs. There may be the potential for an increase in student complaint claims due to the awareness of the new Enterprise Complaint System. Since all incoming complaints referred to institutions must be reviewed to provide students with reliable and detailed information, an increase in claims without consideration for the limited resources of an institution's financial aid offices potentially continues the reduction in the services available to students. For example, the increases in administrative burdens negatively impact the amount of one on one counseling time each financial aid administrator is able to provide students and families.	Processes	Administrative Burden	Complaints will not be automatically routed to institutions for review or response and will be contacted regarding a complaint only if contact is necessary to provide satisfactory resolution to the customer.
42	ED-2015-ICCD-0138-0014	• Complaints determined to be unfounded: There may be the potential for an increase in student complaint claims due to the awareness of the new Enterprise Complaint System. Since there are incidents when a student is not satisfied with an institution or the institution's financial aid office due to the administrators conveying the required information as to why the student did not meet the eligibility requirements to be disbursed Title IV funds, how will these complaint claims be communicated to the students? There may be cases where the claims are judged to be unfounded, will this determination be considered "resolved"? In order to create transparency, consumers, servicers, and institutions of higher education need to understand our expectations and the limitations of the complaint review process.	Processes	Complaint Resolution	Not all complaints require a change to the customer's existing outcome. In some cases, resolution may be achieved by providing a customer with an explanation or justification of the action taken (e.g., if it relates to a regulatory or policy issue).
43	ED-2015-ICCD-0138-0014	• Record Retention Considerations: Another consideration in the complaint system should be the time period of claim in question. Claims regarding Pell Grant Lifetime Eligibility Usage may require investigations of financial aid records that are decades old and beyond the required federal record retention policy. How should institutions of higher education handle these cases? Institutions of higher education need comprehensive guidance in this area.	Processes	Complaint Resolution	Institutions should follow the processes developed for the Ombudsman process for handling these cases.
44	ED-2015-ICCD-0138-0014	• Data Center for Complaints. Since the system will be a hub of complaints, compliments, and reports of suspicious activity, will all parties be able to extract data pertaining to total number of complaints, total number of complaints considered valid, total number of complaints resolved, total number of complaints considered unfounded or unresolved, total number of compliments, and the total number of reports of suspicious activity? Institutions of higher education can analyze this type of data to improve and enhance services. Thank you for the opportunity to comment on the development of a Federal Student Aid complaint system.	Reporting	Other Reports	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide data to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
45	ED-2015-ICCD-0138-0015	Young Invincibles is a national non-profit organization that performs research and advocacy concerning issues affecting Millennials. We thank the Department for their commitment to developing a higher education complaint system for individuals, and for requesting comments on the proposed system. Young Invincibles has talked to young adults across the country about their first-hand experiences with loan servicing and has heard from thousands of students who are confused or misinformed. We spoke with Courtney, an attorney working for a non-profit, who is reliant on income-based repayment programs and the Public Service Loan Forgiveness program to pay back her student loans. After making 42 payments on her loans, she was told more than half of her loans did not qualify for PSLF, and that she would have to start over. The servicer said it is "not their job" to inform her that her loans were not in compliance, despite her annual submission of her employer certification and several direct conversations during that time. Courtney has begun the arduous process of consolidating some of her loans and starting over, but this situation was an easily avoidable problem that has resulted in a crippling blow to her financial security. We hope this new complaint system will be a welcome relief for students and borrowers like Courtney desperately searching for help navigating the existing student loan system. In order to account for the different types of challenges people are facing, we recommend the complaint system feature the following five characteristics: 1. Linked with the current complaint systems; 2. Accessible to all students and borrowers; 3. Accountable and responsive on all complaints; 4. Provides meaningful information to the public; 5. Secures individuals' sensitive information.	Context	Context	Thank you for your comments.
46	ED-2015-ICCD-0138-0015	1. The System Should Be Linked with Current Complaint Systems There is currently a good model of a consumer complaint system in place at the Consumer Financial Protection Bureau that has handled hundreds of thousands of complaints since its inception. Additionally, there are state-level authorities and other programs like operated by the Federal Trade Commission dedicated to tracking consumer complaints. This system should be as fully integrated into those existing frameworks as is possible, so complaints can be referred to the proper agency when necessary. Finally, the complaint system must have the capacity for individuals to report problems with their schools, specifically possible misrepresentations and problems with the quality of instruction. Educational quality is as important an issue as any issue people might be having with their servicer or navigating their aid application.	Collaboration	CFPB	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel, and the Consumer Financial Protection Bureau. ECS is designed to handle all complaints related to the Title IV aid programs.
47	ED-2015-ICCD-0138-0015	2. The System Should Be Accessible to All Students and Borrowers The new system needs to meet students and borrowers from a diverse range of linguistic and socioeconomic backgrounds with information that is clear, consumer-tested, and easy to access. FSA should focus group all proposed language and design choices with representative groups of consumers. Focus group discussions should include coverage of language used, images used, and user interface experience. For example, the section that asks for "compliments" for the Department or servicers should more accurately and professionally be termed "positive feedback."	User Experience	Compliment	FSA will replace the word 'compliment' with a synonym that is more user-friendly.
48	ED-2015-ICCD-0138-0015	Additionally, the number of questions on each page should be featured prominently at the header of the page so the user knows how many questions to expect as they are moving through the process.	User Experience	Plain Language	The number of questions required is dependent on the nature of the customer's complaint; therefore, the number of questions cannot be calculated prior to the complaint submission.
49	ED-2015-ICCD-0138-0015	In light of many young people being digital natives and a smaller group being smartphone-dependent, the website should also be mobile-friendly and available as a mobile phone app. For students or borrowers unable to engage through the website, a call-in option should be easy to find and to use.	User Experience	Mobile	The complaint system will be optimized for mobile devices.
50	ED-2015-ICCD-0138-0015	To reach the broadest number of borrowers, the complaint system should be available in multiple languages. We suggest deliberately mirroring the CFPB's language line, which covers over 180 languages.	User Experience	Languages	While language support beyond English and Spanish is not planned for system implementation on July 1st, 2016, FSA is exploring options for additional language capabilities in future releases.
51	ED-2015-ICCD-0138-0015	Finally, the complaint system portal must be easy to find. This means advertising the complaint system prominently on key forms and on the main pages of sites for the Department of Education, FSA, and servicer sites. The portal should also be search engine optimized, so students or borrowers looking for information about loans and servicing are directed to the complaint system quickly. Finally, information about the complaint system should be explicitly included in all counseling for federal borrowers, so students know at the beginning and end of their formal education that it is available to them as a resource.	Communications	Marketing	FSA will launch a multi-faceted communications and outreach plan prior to formal implementation on July 1st, 2016, to ensure that ECS can be easily found by customers.
52	ED-2015-ICCD-0138-0015	Complaints should also be kept open until the user is completely satisfied with one of a limited number of possible resolutions. Resolution information should be tracked by school and by servicer in the database including clear specifics on if the complaint was resolved and how the complaint was resolved.	Processes	Complaint Resolution	FSA will explore the possibility of developing functionality to track and report on customer satisfaction with resolutions in the near future.
53	ED-2015-ICCD-0138-0015	3. The System Should Be Accountable and Responsive on All Complaints Students and borrowers filing a complaint also need a system that provides swift and efficient resolution on all complaints, by having clear deadlines, getting complaints into the right hands, and keeping complaints open until they have official resolution. Students who file a complaint deserve a timely response. The current CFPB approach, which allows 60 days for resolution, provides a strong standard here.	Processes	SLAs	FSA will consider this recommendation when developing formal obligations for ECS.
54	ED-2015-ICCD-0138-0015	There should also be clear information on how to contact someone to check on the progress made, and as well as clear expectations as to when the user will recieve a response and resolution.	User Experience	Notifications	Information on next steps and on how to check progress made will be available on the ECS site as well as in follow-up communication.
55	ED-2015-ICCD-0138-0015	Finally, the system should include a whistleblower button that enables users to file third-party reports of wrongdoing. This should prominently be included on the initial system home screen, in lieu of the button that currently is marked "suspicious activity." It's easier for the user to file a complaint without having to determine if what they've experienced is suspicious or not. Whistleblower protections should be included in the FAQ box to the right of the buttons so users, potential whistleblowers or not, can clearly understand the nature of those types of complaints and how they are handled.	User Experience	Suspicious Activity	Reports of wrongdoing may be submitted via the 'suspicious activity' process. This process is broader than 'whistleblower' reports.
56	ED-2015-ICCD-0138-0015	4. The System Should Provide Meaningful Data to the Public The new complaint system provides a powerful potential source of data for advocates, students, and counselors. The annual report about the complaints received required under the Student Bill of Rights should be published in a consumer-friendly, easily accessible format the layman can navigate and understand. The report should also include disaggregation by race, ethnicity, age, and gender in all cases where it is statistically feasible. A public, easily searchable system will be a vital tool in informing users that the issues that they are confronting are not singular, but rather, systemic problems many other people are experiencing. The more visible and accessible the problems to those that can solve them, the faster they will be addressed at the local, institutional, state, and federal level.	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined. This recommendation will be taken into consideration during the report design process.

#	ID	Comment	Category	Subcategory	Response
57	ED-2015-ICCD-0138-0015	5. The System Should Secure All Sensitive Information The system should protect individuals' sensitive personal information and allow users to make complaints anonymously. However, there should still be the option for anonymous complainants to receive feedback and be contacted should they desire it. Thank you for the opportunity to comment on the proposed complaint system. We hope that the Department of Education finds our input valuable and we look forward to continuing to work together.	Security	Authentication	All users have the opportunity to file a complaint, compliment, or suspicious activity anonymously. By doing so, the customer has the ability to provide as much contact information (first name, last name, phone, and/or email) with which they are comfortable. FSA will reach out to the customer for further information if needed.
58	ED-2015-ICCD-0138-0016	Thank you for providing an opportunity to submit comments on the upcoming student loan complaint system as part of President Obama's Student Aid Bill of Rights. We represent the Higher Education Loan Coalition, a grassroots organization of practicing financial aid administrators dedicated to the continuous improvement and strengthening of the federal loan programs. We write in response to the Department of Education's request for comments on the proposed Enterprise Complaint System (ECS). Our student borrowers need an easily accessible and uncomplicated system to record their complaints and concerns regarding their student loan eligibility, servicing issues, and collection experiences. We offer the following suggestions:	Context	Context	Thank you for your comments.
59	ED-2015-ICCD-0138-0016	• Coordinate and electronically link the complaint systems currently used by the Federal Trade Commission, the Consumer Financial Protection Bureau (CFPB) and the various state higher education authorities. Borrowers should be able to file a complaint in one complaint system and have this complaint directed to the appropriate entity with links to more than one entity when responsibilities are jointly held. Coordination should make the process less confusing for the borrower, less administratively burdensome for the school to respond, and allow for the appropriate entity to monitor response and resolution among all parties involved in a more efficient manner. A connected ECS will enable government agencies to develop an early warning system—protecting borrowers and correcting or suspending schools with serious compliance and potentially misrepresentation issues while protecting schools from complains outside their control. The volume and type of complaint may signal that additional oversight or emergency actions are needed to protect borrower and taxpayer interests.	Collaboration	CFPB/FTC	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel, and the Consumer Financial Protection Bureau.
60	ED-2015-ICCD-0138-0016	• Allow the borrower a way to easily track their complaint, including notification of transfer to a different government entity for response. For example, if a private loan complaint, the transfer to CFPB would be noted in the ECS.	User Experience	Case Management	Authenticated customers may track their complaint via the online customer case management tool. Unauthenticated but identified customers may track their complaint via phone beginning on July 1, 2016. Customers will be notified if their complaint is referred to an external entity such as the CFPB.
61	ED-2015-ICCD-0138-0016	• Develop standard response deadlines for action and resolution and publish those deadlines and the Department of Education's process for the borrower to understand the next steps toward resolution. This will aid in providing the borrower with a transparent process. Complaint data needs to be collected, but it is more important to ensure that the borrower knows that action will be taken and the follow through will be evident. Assure that metrics from the system are available and shared with the community to demonstrate the Department of Education's commitment to transparency and to allow the community to assist, where appropriate, in understanding and working to resolve any systemic issues that the complaint system may bring to light.	Processes	SLAs	FSA will consider this recommendation when developing formal obligations for ECS.
62	ED-2015-ICCD-0138-0016	• The Department of Education needs to clarify the Student Loan Ombudsman's role in the new ECS. Will this office be yet another way to register a complaint or will the Ombudsman only become involved when complaints are not readily resolved?	Processes	Integration	The Ombudsman is the office responsible for managing ECS. The Ombudsman process is intended for complaints that may require more substantive research or dispute resolution actions, while ECS is intended for feedback that may not rise to that level. Complaints submitted to ECS that, upon review, are better placed in the Ombudsman process, will be seamlessly transferred to the Ombudsman Case Tracking System (OCTS) with no action required on the part of the customer. The customer will be notified in this scenario.
63	ED-2015-ICCD-0138-0016	• Consumer testing during product development is essential to assure that the system is accessible, responsive to the complainant's needs and collects information necessary to support an efficient process to respond to complaints. We urge rigorous testing and suggest that there also may be some benefit from coordination of this effort with agencies such as the CFPB who have recently solicited and received significant input from borrowers in distress.	Development	Testing	Usability Testing, which occurred at the beginning of February, included tests by representatives from several consumer advocacy organizations as well as current college students, in addition to subject matter experts at the Department of Education.
64	ED-2015-ICCD-0138-0017	On behalf of American Student Assistance (ASA), I thank you for the opportunity to provide feedback on the Department of Education's proposed Enterprise Complaint System (ECS). As the Ombudsman at ASA for seventeen years I know firsthand that borrowers want and need to tell their stories. They want to be heard. Many borrowers tell me that they want to help other borrowers who are in the same situation. At ASA, we embrace any chance to reach out to a borrower to provide a resolution. We believe that "a complaint is a gift" in that it gives us an opportunity to research a policy, process, or communication that needs attention. As an organization that has advocated for students and borrowers for many years, and one that understands the complexities involved in managing consumer disputes, we are very excited for what we see to be a potentially invaluable tool in ensuring all borrower disputes are addressed in an efficient and consistent manner. We also look forward to the utilization of the ECS to identify trends of borrower concerns so that these trends can be managed and addressed in a proactive way. Below, please find more specific comments and suggestions related to the documentation provided in the Federal Register:	Context	Context	Thank you for your comments.
65	ED-2015-ICCD-0138-0017	▢ It is important that the complaint process itself make information necessary for researching and resolving a dispute seamless to the borrower. The Master Promissory Note notifies the borrower that information may be shared to determine eligibility for a benefit or to verify compliance with student loan regulations. That should be enough to facilitate the exchange of reasonable information to resolve the dispute or investigate the complaint among industry participants. If it is not, please include such a waiver in the initial compliant submission process.	Security	Data Protection	Individuals responsible for managing cases will have access to data sources including the National Student Loan Data System (NSLDS) and Common Origination and Disbursement (COD) in order to eliminate the need to ask the customer for such information.
66	ED-2015-ICCD-0138-0017	▢ Anonymous complaints should not be made public as the validity of the complaint cannot be verified. We encourage the Department of Education to follow up on these complaints however as much as feasible, and utilize them to help identify trends.	Reporting	Other Reports	The format of planned or possible reports has not yet been determined. This recommendation will be taken into consideration during the report design process.
67	ED-2015-ICCD-0138-0017	▢ An expectation as to the time line for the complaint process should be transparent to the consumer and adhered to as much as possible. We feel that a reasonable response timeline would be two business days for a consumer to receive an acknowledgement of receipt of their complaint and ten days for a response. Complicated cases could take as much as 30 days. Industry participants who receive a request for information related to a complaint from the ECS should be required to respond and/or supply the requested information within five business days. The expected response time should be communicated to the consumer on the final submission page and updated within case management.	Processes	SLAs	An automatic email confirmation will be provided to customers who provide their contact information. When the status of a complaint has changed (e.g., the complaint has been forwarded to another unit within FSA for follow-up), this change will be reflected in the case management tool and the customer will receive an email detailing information about this step. In this way, the customer will be able to determine where their complaint is in the response process. FSA will consider the timing recommendation when developing formal obligations for ECS.
68	ED-2015-ICCD-0138-0017	▢ There is a concern regarding having a third party provide their FSA PIN if they are submitting a complaint or suspicion on someone else's behalf. The concern surrounds the appearance of "requiring" the third party to provide their own loan information via the FSA PIN process when in fact the complaint or suspicion has nothing to do with that person's loans. Perhaps, a solution would be that third parties should be identified prior to the FSA ID submission process.	Security	Third Parties	An FSAID is not required to submit a complaint, either for customers or for third parties.
69	ED-2015-ICCD-0138-0017	▢ While we understand the value of information collection, we feel strongly that in order for the ECS to be effective for borrowers, it must be easy to understand and use. This can generally be achieved by making the process as clean as possible. To that end, we suggest removing the tuition paid field from the initial complaint submission screen (2.1.1) as it may not be relevant to the complaint and it is inconsistent that it is only asked for from those with military affiliation.	User Experience	Plain Language	The Tuition Paid field is an optional field for those affiliated with the military. This information is required to support the processes of the Principles of Excellence.
70	ED-2015-ICCD-0138-0017	▢ It is not clear on the first page that the suspicious activity option only refers to the origination and disbursement of federal student aid. That appears however, to be the case once one gets to the screenshot on 3.2.1. Please add clarifying language to the start page to make it clear to consumers.	User Experience	Plain Language	This process does not only refer to the origination and disbursement of federal student aid. The description states "...a suspicious activity in relation to the federal student aid process."
71	ED-2015-ICCD-0138-0017	▢ Entities related to the borrower's loans, including the servicer, lender, guarantor and school, should have access to the complaint system. This will help communication between entities and allow the user to determine if a complaint has been addressed in the past.	Processes	Routing	In the current iteration of ECS, complaints will be auto-routed only to federal loan servicers. Future functionality that allows for auto-routing to additional contractors is planned in the near future. When applicable, complaints can be referred to outside organizations for review and resolution.
72	ED-2015-ICCD-0138-0017	▢ The "complaint closed" letter must be specific and detailed as to why the Department of Education has taken no action. The regulation must be cited and explained and a list of additional remedies, if applicable, should be presented to the borrower.	User Experience	Complaint Resolution	In cases where the resolution is for FSA to provide an explanation or justification of a regulation or policy, detailed information on the regulation or policy will be provided.
73	ED-2015-ICCD-0138-0017	▢ Any letters or other correspondence sent to the consumer should be sent to the loan holder to be placed in the borrower's files for reference in future or duplicate complaints.	Processes	Routing	Any correspondence generated within ECS will be included in the data associated with a particular case. If a case is routed within ECS to a loan holder, that loan holder will be able to view this case history to aid in resolving the case.
74	ED-2015-ICCD-0138-0017	▢ To ensure expeditious responses to those working the complaints, we recommend allowing a minimum of ten access tokens per organization.	Processes	Partner Licenses	The number of partner licenses provided to servicers has been increased.
75	ED-2015-ICCD-0138-0017	ASA's Consumer Advocacy Division would again like to thank you for the opportunity to share our feedback on the Enterprise Complaint System and its implementation. We should not be afraid to hear criticism or complaint, as that is the best way to change and learn from mistakes. We also must be cognizant of the fact that as much as we try to make borrowers content with their student loan situation, we are in a business that greatly impacts people's financial lives and we can't make everyone happy. If we can't accept that, hear the criticism, try to do the very best job we can for each and every borrower we encounter to mitigate reasons for complaint, than we are not respecting the responsibility we have to work to improve the lives of student loan borrowers. Albert Einstein once said, "Any fool can know. The point is to understand." We know there are problems borrowers have with all aspects of the student loan industry. We will never truly understand those issues, however, if we are only hearing a portion of the borrower's story. I applaud your efforts in giving individuals the chance to make a difference and be heard. I also encourage all in the student loan industry to find ways to truly hear what borrowers are saying so that we can make changes for the better throughout the industry. We look forward to the positive changes this complaint system will bring to this industry.	Context	Context	Thank you for your comments.
76	ED-2015-ICCD-0138-0018	On behalf of the 1.6 million members of the American Federation of Teachers, including more than 200,000 higher education faculty and staff, we commend the Department of Education (ED) for acting to fulfill the promise of the Student Aid Bill of Rights by developing a student feedback system. We hear from our members frequently on all aspects of the student aid life cycle, including stories of fraud and abuse. A user-friendly complaint system reflecting commitments to accountability, transparency and coordination will make a real difference in the lives of our members and the communities we serve. The AFT strongly supports the goals of a student feedback system as laid out by the White House in March 2015: ▢ "Create a Responsive Student Feedback System: The Secretary of Education will create a new web site by July 1, 2016, to give students and borrowers a simple and straightforward way to file complaints and provide feedback about federal student loan lenders, servicers, collections agencies, and institutions of higher education. Students and borrowers will be able to ensure that their complaints will be directed to the right party for timely resolution, and the Department of Education will be able to more quickly respond to issues and strengthen its efforts to protect the integrity of the student financial aid programs. In addition, the President will direct the Department of Education to study how other complaints about colleges and universities, such as poor educational quality or misleading claims, should be collected and resolved and to strengthen the process for referring possible violations of laws and regulations to other enforcement agencies. These actions will help ensure more borrowers get fair treatment throughout the federal student loan process." The draft feedback system is a positive step forward. But, as presented in the text baseline and at the 2015 Federal Student Aid Training Conference, it does not meet the goals described above, because it does not go far enough to help students and borrowers, or to help ED more effectively uphold the integrity of the student financial aid system. "Students and borrowers will be able to ensure that their complaints will be directed to the right party for timely resolution." The wording of the Student Aid Bill of Rights could not be more clear: The burden of referring complaints to the appropriate agency should be with ED, not the student/borrower. The system should connect seamlessly to other existing complaint systems; consumers should not be expected to know where Treasury's authority begins and ED's ends, or what kinds of complaints belong with the FTC Consumer Sentinel and which with regional accreditors. Yet as currently proposed, the feedback system simply tells complainants to refile their complaint with a different agency. A much better, seamless and more effective system would allow the feedback system to directly pass along complaints to other appropriate agencies, and we strongly urge the department to adjust the system accordingly.	Context	Context	Thank you for your comments.

#	ID	Comment	Theme	Subtopic	Response
77	ED-2015-ICCD-0138-0018	"The Department of Education will be able to more quickly respond to issues and strengthen its efforts to protect the integrity of the student financial aid programs." A key missing component of the proposed feedback system is information about how ED plans to use the data collected to protect the integrity of taxpayer funding and the student aid programs. The system should be connected to the FTC Consumer Sentinel, so that those responsible for law enforcement at the federal and state levels have immediate access to all complete complaints. Connecting the system to Consumer Sentinel has many positives: As already discussed, the burden on complainants will be much lower if they only have to submit feedback once and the federal and state agencies share necessary information; complaints, including those that point to violations of laws and regulations, that have been submitted to other agencies will be able to be aggregated with feedback submitted through ED's system, allowing for better identification of trends and patterns; and advocates and stakeholders will finally have a centralized portal for all student and borrower complaints, instead of the current fragmented system comprising Federal Student Aid, ombudsman, Consumer Financial Protection Bureau, ED regional offices, state complaint systems, state law enforcement, Federal Trade Commission, Department of Defense, Veterans Affairs, etc. Even if all of these agencies do not currently use Consumer Sentinel, any effort at centralizing this information for better sharing should be supported. The draft feedback system impedes this sharing rather than supporting it. An example of the program integrity benefit to seamless information sharing is the Department of Education's January 2016 Don't Be Fooled public awareness campaign. This campaign seeks to remind borrowers that several loan management options are available that do not require paying a third party fee to access, and it directs borrowers who may have been scammed to state Attorney General offices, the CFPB and/or the FTC. This is precisely the type of multiagency effort that a centralized complaint system has the potential to help streamline, and highlights the need for a student and borrower feedback system that facilitates coordination by connecting to Consumer Sentinel.	Collaboration	CFPB, FTC	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel, and the Consumer Financial Protection Bureau.
78	ED-2015-ICCD-0138-0018	Accountability and Transparency: A centralized feedback system has great potential for more effective oversight, transparency and accountability in the student financial aid system, and a collection of complaints and concerns can be used to more easily identify worrisome trends and patterns that require follow-up action. We strongly urge ED to use this information in a way that improves all aspects of the financial aid programs and strengthens the public impression of ED as an assertive "cop on the beat" with respect to the student financial aid system. Student aid is serviced through contractors, distributed by institutions and regulated by several agencies. But when our members, and the public in general, think of student aid, they think of the Department of Education. When they feel mistreated by an institution of higher education, they want to report it to ED. Companies trying to scam consumers into paying for income-driven repayments commonly represent themselves as having an affiliation with the Department of Education. Accordingly, we urge the department to take its reputation seriously, and to explicitly commit to holding contractors and schools accountable via this system. This accountability should include public disclosure of complaints received. Though ED has committed to annual reports summarizing the complaints, we believe that because of the fraud and abuse that are rife in the student loan industry, standards of transparency should be higher. The complaint database should be public, trackable and searchable, with personally identifying information removed. Lawmakers, advocates and stakeholders should be able to search the system by institution or contractor. If this feedback system remains closed and private, as proposed, not only will ED be missing an enormous opportunity to stand up for quality in higher education, but the complaints collected will remain outside the public purview, protecting shady student aid practices by keeping them outside the sanitizing influence of sunlight.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
79	ED-2015-ICCD-0138-0018	The principle of accountability also requires that the system have clear deadlines. As currently presented, there are no deadlines in the complaint system. This will allow unscrupulous actors to continue to dodge citizens with complaints, a problem that will only be exacerbated if the complaint narratives are not made public. Meanwhile, semesters will be starting, financial aid deadlines passing, and repayments will be due month after month. Complainants and ED should expect an answer within 15 days, and all but the most complicated complaints should be resolved within 60 days to minimize the damage to student success.	Processes	SLAs	FSA will consider this recommendation when developing formal obligations for ECS.
80	ED-2015-ICCD-0138-0018	Consumer Friendly: The potential benefit of a feedback system will be realized only if the system is designed in way that makes it easy for students and borrowers to navigate and understand. We suggest that stronger efforts be made to ensure the text and the complaint process are more consumer-friendly, perhaps through focus groups or applying plain language standards. Jargon-heavy descriptions and long drop-down menus will hamper the effectiveness of this system. In the current draft, a consumer is invited to either "report suspicious activity" or "file a complaint." There is a vast universe of suspicious activity in the student loan industry, much of it worth complaining about. Instead we suggest consolidating these categories and allowing individuals to identify themselves as "whistleblowers" or "consumers" to channel the interactions of website users within the complaint system.	User Experience	Suspicious Activity	FSA has performed usability testing and invited consumers, advocacy organizations, user experience experts, and current college students to test an early version of the system. FSA is in the process of making changes to ECS as a result of the many excellent suggestions provided by these testers.
81	ED-2015-ICCD-0138-0018	Additionally, the words "complaint" and "compliment" are similar enough as to be potentially confusing for users, especially those users whose native language is not English.	User Experience	Compliment	FSA will replace the word 'compliment' with a synonym that is more user-friendly.
82	ED-2015-ICCD-0138-0018	Finally, many of the drop-down menus proposed do not offer an "other/don't know" option; especially in the cases of potential fraud, it is possible that borrowers would not know which debt collection agency is contacting them and/or that the collector is not among the listed entities, for example. A student wanting to report the type of scam highlighted in the Don't Be Fooled public awareness campaign does not currently have the option to appropriately categorize his or her complaint. We therefore suggest adding an additional value that recognizes such situations.	User Experience	Complaint Types	"Other" is an option for a suspicious activity submission.
83	ED-2015-ICCD-0138-0019	Thank you for working to create the state-of-the-art federal student aid complaint and feedback system envisioned in the March 2015 Presidential memorandum on a student aid bill of rights. We write in response to the Department of Education's request for comments on the proposed Enterprise Complaint System ("ECS"). As advocates for students, consumers, veterans, faculty and staff, civil rights and college access, we believe the systematic tracking and reporting of student and borrower complaints is essential to providing quality customer service, ensuring college and loan servicer and collector accountability, and preventing waste, fraud, and abuse of taxpayer dollars. We applaud the Department for proposing a financial system that accepts complaints about loans, other aid, and institutions participating in the Title IV program. We are also glad that the Department plans to offer both English and Spanish in the system's online, phone, and chat functions. Lastly, we appreciate that the system will protect consumer privacy and ensure users who wish to remain anonymous can do so. As the Department has acknowledged, "Currently, there is no single contact or system for the receipt of these types of student [or] borrower complaints to Federal Student Aid. Instead separate business units in FSA handle these types of complaints on an ad-hoc basis and there is no cross checks for duplication of effort." To increase accountability and transparency, the President committed to providing all student loan borrowers with access to an efficient and responsive complaint and feedback system. The White House's explanation of the system's purpose is for "students and borrowers [to] be able to ensure that their complaints will be directed to the right party for timely resolution, and the Department of Education will be able to more quickly respond to issues and strengthen its efforts to protect the integrity of the student financial aid programs." To fulfill the Administration's goal, we believe the complaints system needs to be public and searchable, connected to the complaint systems used by other federal and state agencies, and clearer and easier to use. Only then will the system be well suited to resolve complaints in a timely fashion, provide useful consumer information, and identify trends for the government's enforcement efforts. We detail these recommendations below.	Context	Context	Thank you for your comments.
84	ED-2015-ICCD-0138-0019	Publicly Track Complaints and Link ECS With Existing Complaints Systems: The Department's complaint and feedback system must be public, searchable and connected to the systems at other agencies. As it stands, the Department's proposal appears to create an independent, private system. A private system does not provide the public with information on individual complaints or allow the public to search complaints by issue, contractor, institution, or other characteristic. A public system will help inform consumers, prompt contractors, schools, states, and accreditors to more rapidly address common problems, and enable the Department to better focus its staff time and resources. A public system will also increase public confidence in the Department's oversight and management of Title IV funds. In addition, making the system public is consistent with the Administration's commitment to the Open Government Initiative. We urge the Department to implement a public, linked complaints system that: • Is searchable, including optional consumer complaint narratives. A searchable complaint tracking system is the best way to ensure it protects students and borrowers. Optional public complaint narratives, such as those now provided by the Consumer Financial Protection Bureau's ("CFPB") system, provide consumers with information to evaluate whether common complaints are applicable to them. These narratives are also valuable because they help provide context to complaints for users and others.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
85	ED-2015-ICCD-0138-0019	• Is connected to the Federal Trade Commission's ("FTC") Consumer Sentinel Network so Federal and state agencies have immediate access to all complete complaints. This Is critical because Consumer Sentinel Is the only method by which state and Federal law enforcement can gain timely access to complaints. enforcement agencies use Consumer Sentinel to track trends, collect evidence, and identify bad actors. Integrating the Department's system with Consumer Sentinel will facilitate efficient resolution of issues and further increase accountability by providing an earlier warning and greater documentation of systemic issues and more quickly enable other agencies to use their enforcement powers where appropriate. It may also prevent users from having to submit their complaints twice.	Collaboration	FTC	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel.
86	ED-2015-ICCD-0138-0019	• Refers complaints directly to the relevant entity, whether a contractor, guaranty agency, state, accreditor, or other federal agency. For instance, all private loan complaints should go directly to the CFPB's system. Complaints pertaining to state oversight issues should be referred to the proper state agency. If jurisdiction is shared or unclear, the system should accept the complaint and share or transfer it to the proper entity so that the user does not have to submit a complaint twice. For example, in cases where both the Department and CFPB have jurisdiction, such as with federal loan servicing or collection, both agencies should receive and track the complaint. In other words, the user should not have to decipher where their complaint should go or have to submit multiple complaints with different entities.	Collaboration	CFPB	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel, and the Consumer Financial Protection Bureau.
87	ED-2015-ICCD-0138-0019	• Includes deadlines for action and resolution. The public needs to understand the Department's process and when it can expect an answer. For example, the CFPB's complaint system states "We'll forward your complaint to the company and work to get a response. After we forward your complaint, the company has 15 days to respond to you and the CFPB. Companies are expected to close all but the most complicated complaints within 60 days. You'll be able to review the response and give us feedback. If we find that another agency would be better able to assist, we will forward your complaint and let you know."	Processes	SLAs	FSA will consider this recommendation when developing formal obligations for ECS.
88	ED-2015-ICCD-0138-0019	• Asks the consumer if they are satisfied with the outcome and ensures agency staff reviews complaints where the consumer is not satisfied. Complaints should stay in the system and remain open until they are resolved, and consumers should have a chance to state whether they are satisfied with the resolution. Under the Department's proposal, it's unclear how the Department's role differs from that of its contractors, likely leading Department staff to spend time on functions that contractors are already paid to perform. We recommend the system instead hold contractors accountable and ask the complainant if they are satisfied with the resolution so as to focus Department staff resources on resolving complaints where the consumer is not satisfied with the resolution, addressing systemic issues, and holding contractors, schools, and other entities accountable for their roles in the Title IV program. The role of the FSA ombudsman should be reexamined and clarified because it is unclear how the ombudsman interacts with the complaint system. For complaints transferred to another branch of the triad, such as a state agency or accreditor, the system should ask to be told when an issue is resolved so the system can ask whether the consumer is satisfied. This will facilitate prompt resolution, promote proper functioning of the triad, and alert the Department when a state or accreditor is receiving a large number of complaints in which the complainants do not get a response or are not satisfied with the outcome. These changes are essential to efficiently using taxpayer resources and maximizing accountability for students and borrowers on the part of lenders, servicers, institutions, and contractors.	Processes	Complaint Resolution	FSA will explore the possibility of developing functionality to track and report on customer satisfaction with resolutions in the near future.
89	ED-2015-ICCD-0138-0019	Increase Ease of Use for Students and Borrowers: The complaints system should be easy to use and utilize language that is clear to students and borrowers. We find some of the language and instructions in the ECS baseline unclear and are glad the Department plans to test the system this spring to collect feedback before formally launching the system by July 1. To improve usability and effectiveness of the system, we recommend the following: • Make it clear that the system accepts all types of complaints. It is not currently clear from the landing page that the system accepts all types of complaints, including about loan servicing and collection, grants, and schools that offer federal loans or grants.	User Experience	Plain Language	The text on the pages leading to ECS will be modified accordingly.
90	ED-2015-ICCD-0138-0019	• Replace the "report suspicious activity" function with a section specifically for whistleblowers, and consolidate all other complaints under "submit a complaint." The user should not have to decide whether they are reporting "suspicious activity" or a "complaint." The Department should inform whistleblowers of the special protections afforded to them and treat their complaints differently as a result.	User Experience	Suspicious Activity	Reports of wrongdoing may be submitted via the 'suspicious activity' process. This process is broader than 'whistleblower' reports.
91	ED-2015-ICCD-0138-0019	• Request the consumer's personal information after the complaint information, as in the FTC and CFPB's systems, to encourage users to complete complaints.	User Experience	Submission Flow	Because some functionality, including the use of chat as a support channel, is only available to customers who log in with FSAID, customers are asked to select their log-on method and input data first in order to ensure that they can be provided with as much support as possible during the complaint submission process.
92	ED-2015-ICCD-0138-0019	• Make the text clearer and friendlier to consumers. For example, it should use plain language names and titles of servicers (e.g., "FedLoan" instead of Ed-PHEAA).	User Experience	Plain Language	The servicer list is identical to that currently used by the Ombudsman team and precision is required to ensure clarity as well as for analytical and reporting purposes.

#	ID	Comment	Category	Subcategory	Response
93	ED-2015-ICCD-0138-0019	Thank you for making the coordinated tracking of consumer complaints a priority. We stand ready to assist you in improving and promoting such a system to ensure student and borrower complaints are systematically accepted, tracked, and reported to protect students, help them make informed decisions, and improve oversight and accountability. Sincerely, Air Force Sergeants Association, American Association of University Women (AAUW), American Federation of Labor-Congress of Industrial Organizations (AFL-CIO), American Federation of Teachers, AFL-CIO, Americans for Financial Reform, Center for Public Interest Law, Center for Responsible Lending, Children's Advocacy Institute, Consumer Action, Consumer Federation of America, Consumer Federation of California, Consumers Union, Council for Opportunity in Education, Demos, The Education Trust, Empire Justice Center, Government Accountability Project, Higher Ed, Not Debt, Housing and Economic Rights Advocates, Initiative to Protect Student Veterans, The Institute for College Access & Success, Institute for Higher Education Policy, League of United Latin American Citizens (LULAC), MALDEF, NAACP, National Association for College Admission Counseling National Association of Consumer Advocates, National Consumer Law Center (on behalf of its low-income clients), National Consumers League, National Council of La Raza (NCLR), National Women Veterans Association of America, National Women's Law Center, New York Legal Assistance Group, Project on Predatory Student Lending of the Legal Services Center of Harvard Law, Public Advocates, Inc., Public Good Law Center, Public Law Center, Service Employees International Union (SEIU), Student Debt Crisis, Student Veterans of America, United States Student Association, University of San Diego School of Law Veterans Legal Clinic, U.S. PIRG, Veterans Education Success, Veterans for Common Sense, Veterans' Student Loan Relief Fund, VetJobs, VetsFirst, a program of United Spinal Association, Vietnam Veterans of America, Woodstock Institute, Young Invincibles	Context	Context	Thank you for your comments.
94	ED-2015-ICCD-0138-0020	Americans for Financial Reform ("AFR")1 appreciates the opportunity to comment on the Department of Education (the "Department")'s proposed Enterprise Complaint System ("ECS"). We are encouraged that the Department is taking steps to develop a system that allows for complaints about not just federal aid and loans, but also the institutions that participate in the Federal Title IV Fund program. It is crucially important that students and borrowers have a centralized place to report problems and issues with their schools, loans, and loan servicing, and we commend the Department for its proposal. We have several general recommendations, detailed in Section I, and more detailed recommendations, which we have included in Section II, that we believe would greatly improve the final ECS. I. General Recommendations	Context	Context	Thank you for your comments.
95	ED-2015-ICCD-0138-0020	a. Complaint Transparency and ECS Information Sharing AFR strongly supports the crucial recommendations made in the joint letter submitted by coalition of consumer and student advocacy groups ("coalition letter"), which AFR and over 50 other organizations signed onto.2 As highlighted in the coalition letter, the ECS must be public and searchable, with optional consumer complaint narratives. While the College Scorecard has been an important new tool for prospective students, there is no way for students and borrowers looking to consolidate their loans to rate the performance of servicers. This is a point highlighted in a comment letter by a financial aid administrator in response to the comment period: that students are looking for advice on which consolidation servicer to choose, and they currently lack resources to make an informed choice.3 This is just one example of the many benefits a public complaint system providesIn addition, as cited in the coalition letter, the ECS must be connected to the Federal Trade Commission's ("FTC") Consumer Sentinel Network, to ensure that the information reported can be accessed by state and federal law enforcement, in order to allow law enforcement to identify patterns and trends to guide their enforcement efforts.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
96	ED-2015-ICCD-0138-0020	b. To Ensure Wide Economic Inclusion, ECS Must be Mobile Ready It was unclear from the Enterprise Complaint System Implementation Text Baseline ("Baseline") included in the Notice whether the Department intends to make the ECS mobile ready – optimized to be viewed and used on a mobile or smartphone. A recent Pew study showed that 7% of Americans are "smartphone-dependent": they only have internet access through smartphones – anddo not have regular access to desktop computers.4 The same Pew study pointed out that this problem is even larger among minorities and low-income Americans: 13% of Americans whose annual household income is less than $30,000 per year are smartphone-dependent; 12% of African Americans and 13% of Latinos are smartphone-dependent. Thus, it is crucial for both fair access and economic inclusion that the ECS be usable on a smartphone (including the widest possible range of mobile devices, web browsers, and desktop platforms). In addition, the ECS should provide options for users to have a copy of their complaint emailed to them, in addition to one to print the complaint, as the population of "smartphone dependent" internet users also do not generally have access to printers.	User Experience	Mobile	The complaint system will be optimized for mobile devices.
97	ED-2015-ICCD-0138-0020	c. Clarify Complaint Resolution Timelines and Allow Users to Dispute Resolution It must be clear to anyone using the ECS on what timeframe they can expect a response to their complaint. Within 48 hours of complaint submission, users should be given a status update – noting where the complaint has been sent or referred to (this will depend on who the third party is), and in how long they should expect a response. For example, a user submitting a complaint about their servicer Navient should receive a notification informing them that their complaint has been received and forwarded to Navient, and that the Department has directed Navient to respond within 15 days. We recommend that the Department give third parties 15 calendar days to respond to a complaint with information on how they will resolve the complaint. Upon receiving a response from the third party, the ECS user should be given the option to dispute the resolution, and provide additional information to the complaint if needed. Throughout the process, changes to a complaint's status should be continuously updated within ECS – so that users who submitted complaints can visit ECS any time and see the status of their complaint. The CFPB's complaint system provides a good model: companies have 15 days to respond to both the user making the complaint and to the Bureau, and companies are expected to be able to close nearly all complaints within 60 days.	Processes	SLAs	FSA will consider this recommendation when developing formal obligations for ECS.
98	ED-2015-ICCD-0138-0020	II. Specific Recommendations a. Directing Users to Other Systems for Out of Scope Complaints In section 1.1 Landing Page of the ECS Baseline ("Baseline") provided in the Notice, it lists the kinds of complaints handled as well as those not handled by ECS. Instead of simply pointing out that ECS does not accept complaints about private student loans, ECS should provide a link to the section of the Consumer Financial Protection Bureau ("CFPB")'s complaint portal that accepts private student loan complaints.	Collaboration	CFPB	Consumers will be directed to the Consumer Financial Protection Bureau in explanatory text on a revised Contact Us page on StudentAid.gov, as well as in Q+As in a dynamically updated knowledge base on the right hand side of the ECS, if they have a complaint related to private student loans, and to other relevant parties (e.g., their school or their servicer) as applicable.
99	ED-2015-ICCD-0138-0020	b. Reporting Suspicious or Unlawful Activity Should be Filed as Complaints, not a Separate Category As noted in the coalition sign on letter, the "report suspicious activity" category listed in the Landing Page should not be a separate category; instead, it should be folded into the "File Complaint" section, and it should be clearly listed that a user can report suspicious or unlawful activity through the "File Complaint" button.	User Experience	Suspicious Activity	The suspicious activity category is broader than 'whistleblower' reports.
100	ED-2015-ICCD-0138-0020	c. Collect the Complaint First, User Information Second As noted in the coalition letter, currently the proposed ECS prompts the user for their personal information at the start of the complaint process, asking them to choose if they'd like to login with their FSA ID, provide personal information, or submit a complaint anonymously. However, it would encourage users to finish their complaints if the request for personal information came instead after they've documented their complaint. This would also match the approach that the FTC and the CFPB have taken in their own complaint systems.	User Experience	Submission Flow	Because some functionality, including the use of chat as a support channel, is only available to customers who log in with FSAID, customers are asked to select their log-on method and input data first in order to ensure that they can be provided with as much support as possible during the complaint submission process.
101	ED-2015-ICCD-0138-0020	d. Improving Complaint Subcategories In section 3.1.4. of the baseline, "Table of Complaint Subcategories," there are several subcategories of common complaints that could use further clarification. For example, it is unclear what is meant by the "Professional Judgment," "Administrative Capabilities" and "Documenting Extenuating Circumstances" subcategories, and the descriptions should be further refined. In addition, it is unclear from the Baseline screenshots whether or not a subcategory is a required field. If it is, it is important to include an "Other" subcategory should the user feel that their complaint does not match any of the supplied subcategories. We appreciate the opportunity to provide feedback on the proposed ECS. We believe that a complaint system that is publicly searchable, connected with the FTC's Consumer Sentinel Network, and mobile-ready to ensures access for users across all income levels will do much to improve the Department's ability to ensure equal access to education.	User Experience	Complaint Types	FSA is refining the language and complaint types and will take this recommendation into consideration.
102	ED-2015-ICCD-0138-0021	In March 2015, President Obama issued a Presidential Memorandum along with the Student Aid Bill of Rights which requires the US Department of Education to create a new web site by July 1, 2016, allowing students and borrowers a simple and straightforward way to file complaints and provide feedback about federal student loan lenders, servicers, collections agencies, and institutions of higher education. We appreciate the opportunity to comment on the proposed complaint system and we applaud the Department for creating a site that is relatively easy to navigate and understand. However, we respectfully request the Department consider making the following updates: replacing the word "compliment" with a word less similar to "complaint", allowing students a way to track their cases even if they do not log in with an FSA ID, requiring fields related to military service, ensuring students first follow the school grievance policies before filing a complaint and allowing schools insight into the complaints being submitted on a standard, scheduled timeframe (weekly, monthly etc.).	Context	Context	Thank you for your comments.
103	ED-2015-ICCD-0138-0021	We support and appreciate the Department's inclusion and opportunity for individuals to submit positive feedback instead of focusing solely on issues and complaints. However, several of our staff members, when viewing the templates, repeatedly mistook the word "Compliment" for "Complaint". Because these words are so similar, we believe that students may inadvertently submit their feedback under the wrong heading. We request that the department use a different word for positive comments, such as "Kudos", "Praise", "Recognition" or simply "Thanks".	User Experience	Compliment	FSA will replace the word 'compliment' with a synonym that is more user-friendly.
104	ED-2015-ICCD-0138-0021	Second, the Student Bill of Rights outlines a format for "students and borrowers [to] be able to ensure that their complaints will be directed to the right party for timely resolution, and the Department of Education will be able to more quickly respond to issues and strengthen its efforts to protect the integrity of the student financial aid programs." We believe that the current template, as proposed will not fully achieve the intention of this outcome. The three current options to provide feedback are "Log in with FSA ID", "Continue without FSA ID" or "Continue Anonymously." While anonymity is a necessary option to receive real and truthful feedback, we believe ED should not only allow users with an FSA ID to be able to track and receive updates on their cases submitted. If the user has included contact information with their comment, they should also be able to set up an account on the site and follow the progress of their issue similar to a user with an FSA ID. Users should have the same follow up response when providing contact information as they do when using their FSA ID. Furthermore, submitting a comment anonymously should not preclude users from receiving a case number to follow up or receive any resolution.	Security	Authentication	In order to ensure that customers' personally identifiable information is protected, ECS has been designed to prioritize information technology security. For this reason, customers who do not provide an FSAID are not able to use the online case management functionality. However, they will be able to manage and track their cases via phone beginning in July 2016.
105	ED-2015-ICCD-0138-0021	Along these same lines, how will student identify and FERPA regulations be maintained? Will there be a FERPA release built-in with the submission (similar to the Better Business Bureau's process)?	Security	Data Protection	For information on the Ombudsman (including ECS) and FERPA, please review the Dear Colleague Letter published on September 25, 2003.
106	ED-2015-ICCD-0138-0021	We noticed that the military section is significantly larger than any of the other drop down areas. Since there are so many nuances for military options, we suggest making these fields mandatory if the submitter selects that they are affiliated with the military so that all appropriate information is provided.	User Experience	Submission Flow	The information requested by these fields are required as part of the process for collecting data under the Principles of Excellence.
107	ED-2015-ICCD-0138-0021	Under the "Complaint" heading, if the user is submitting a complaint against an institution, we suggest adding a question regarding whether or not the school's grievance policy was utilized prior to submitting the complaint. We believe it's in the student's best interest to first try to seek resolution directly with their institution. While students should always have the option to contact the Department, easily resolvable cases should first be addressed with the institution following the internal grievance policies prior to submitting complaints to the Department. We recognize that the Department's time and resources are valuable and therefore we recommend that any issues which can first be reconciled and addressed at the institution level should be attempted first before disturbing the Department.	User Experience	Submission Flow	Language is provided to this effect on the revised Contact Us page and in the knowledgebase. Support staff on phone and chat channels will be trained to ask the complainant if they have tried to resolve their complaint with their school or servicer.
108	ED-2015-ICCD-0138-0021	Additionally, in the spirit of transparency, we recommend that the Department create school-level access to this complaint system whereby, institutions may track comments submitted. Institutions should have the ability to view the comments made to better understand the issues that may be outstanding, or already resolved. If a separate log-in is not a possibility, then we recommend a report institutions may receive or download on a regular schedule (weekly, monthly) to indicate "X" number of comments were submitted this month regarding your institution along with a summary of the comments submitted.	Collaboration	Schools	The content and frequency of reports related to complaint data has not yet been determined.

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109	ED-2015-ICCD-0138-0021	We would also like to better understand how the Department plans to assign complaints and assist in expedient resolution. This will help institutions better prepare for next steps related to this new system. Also, we respectfully request that the Department add help text to explain the statuses of each case. What does it mean if a case is closed versus resolved? Students should have the ability to drill down into the details of their case and confirm that their issue has been addressed. In addition, a status bar should be added to show the workflow (resolution process) to visually depict where the submitter is throughout the process and display what the next steps are.	User Experience	Case Management	Complaints will not be automatically routed to institutions for review or response and will be contacted regarding a complaint only if contact is necessary to provide satisfactory resolution to the customer. There are multiple closed sub-statuses, with different types of resolutions. A complaint can be resolved by e.g., adjusting their outcome, providing an explanation, or transferring their case to an outside entity if required. Complainants will receive email notifications throughout the lifecycle of their complaint and be provided with details of their resolution.
110	ED-2015-ICCD-0138-0021	In closing, we thank the Department for the opportunity to comment on the template provided. We respectfully request that any data related to complaints or issues not be made publically available unless and until the institution is given an adequate opportunity to respond and/or resolve the complaint.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
111	ED-2015-ICCD-0138-0022	The Consumer Bankers Association ("CBA") appreciates the opportunity to respond to the Department of Education's ("the Department") request for comment, pursuant to the Paperwork Reduction Act ("PRA"), regarding the proposed Enterprise Complaint System. We hope to be a resource as the Department determines the best model to "give students and borrowers a simple and straightforward way to file complaints and provide feedback about federal student loan lenders, servicers, collection agencies, and institutions of higher education." Lessons Learned from the Consumer Financial Protection Bureau's Database Through feedback from our members and working with the Consumer Financial Protection Bureau ("CFPB"), we have gained extensive experience with the CFPB's Complaint Database ("CFPB Database") and believe we can offer unique insight and industry perspective as the Department creates its own complaint portal. This experience is the foundation for the following suggestions on "how might the Department enhance the quality, utility, and clarity of the information to be collected." When constructing the Enterprise Complaint System, we suggest the Department follow the Federal Trade Commission ("FTC") model where complaints "are entered in [the FTC's] secure online database, which is used by many local, state, federal, and international law enforcement agencies." Using this format, the FTC is able to keep consumers' sensitive information private, while still providing law enforcement agencies with information necessary to pursue and resolve investigations. Using this approach, the Department would not jeopardize individual records and would still be able to publish overall conclusions gleaned from the database in the annual report mandated by the White House's Student Aid Bill of Rights Presidential Memorandum. If the Department chooses instead to release the information publicly, we respectfully ask the Department to promote the utility of the Enterprise Complaint System by: 1. Protecting confidential consumer information; 2. Validating the facts of the complaint (or establishing an appeal process); 3. Contextualizing the information; and 4. Adopting informed disclosures to promote transparency. Neglecting to institute these precautions may lead to the release of sensitive consumer information and the creation of inaccurate conclusions drawn from the information. Out of context, unverified data does not provide insight into the education system and potentially may lead consumers away from potentially beneficial institutions – whether educational or financial. I. Protect confidential consumer information It is absolutely essential the Department establish robust scrubbing standards that filter out any confidential information contained in the published complaint. Matters of education and finance are of the utmost sensitivity in nature and the federal government has a duty to protect such information. We look forward to learning more about the scrubbing process the Department proposes to make sure it adequately protects the private information entrusted it by American consumers.	Security	Data Protection	The format of planned or possible reports has not yet been determined, and although FSA is exploring the possibility of providing a publicly searchable database, one is not planned for immediate implementation. This recommendation will be taken into consideration during the report design process.
112	ED-2015-ICCD-0138-0022	II. Validate the facts of the complaint We urge the Department to follow the lead of many other government agencies by verifying complaints and establishing an appeals process. In conformance with regulation, the Consumer Product Safety Commission ("CPSC") established an appeals process to identify and eliminate materially inaccurate information that would "affect a reasonable consumer's decision making about the product." Before publishing the complaint, if the CPSC determines the information is materially inaccurate, the CPSC: 1. Will not add the information to the database; 2. Correct the materially inaccurate information; or 3. Add information to correct the inaccuracy. After publication, if the CPSC determines the information is materially inaccurate, within seven days of the determination, the CPSC will: 1. Remove the information; 2. Correct the materially inaccurate information; or 3. Add information to correct any inaccuracies. The CPSC's process reduces the risk of misinformation that may have a negative impact on consumers' decision-making process. To enhance the utility of the information, we recommend the Department establish an appeals process similar to that of the CPSC. Specifically, we recommend the Department create a mechanism for lenders, servicers, collection agencies, and institutions of higher education to flag communications that do not amount to complaints or contain materially inaccurate information, and thus should be eliminated from the Enterprise Complaint System.	Processes	Data Accuracy	The format of public reporting from the complaint system has not yet been determined. FSA will take this comment into consideration during report design in order to ensure that reports accurately represent the data collected.
113	ED-2015-ICCD-0138-0022	III. Contextualize complaint information Since the inception of the CFPB Database, news articles have used the complaint data as "evidence" of which institutions are the "Top Ten Most Hated Banks." Because the CFPB does not contextualize or normalize the information when it is released, the institutions with the largest number of complaints are also typically the largest institutions. Clearly, those with the most customers are statistically likely to have the most complaints; however, the news stories often miss this important consideration. In fact, the largest institutions are often the most preferred. A recent J.D. Power survey, as described in a recent American Banker article, confirms this. According to the article, "the nation's six largest depository institutions scored higher than their smaller peers in overall customer satisfaction. Those six banks are Bank of America, Citigroup, JPMorgan Chase, PNC Financial, U.S. Bancorp and Wells Fargo." As indicated in CBA's response to the CFPB's Request for Information on Normalization ("Normalization RFI"), we support contextualizing the complaint data, but assert there are many challenges associated with normalization. Varying business models, customer demographics, and product offerings can distort complaint numbers. As an example, a company that decides to pursue a robust subprime lending portfolio may, as a result, have more loans in default. This would lead to greater need for debt collection communications and, subsequently, more consumers complaining about debt collection. We suggest the Department may have an even greater difficulty comparing "apples to apples" since the proposed Enterprise Complaint System is expected to encompass complaints regarding an array of entities across the higher education and student lending industries. The intended complaint subjects – federal student lenders, servicers, collection agencies, and institutions of higher education – offer a variety of different products and services that do not directly compare. For this reason, we again suggest the FTC model that only relays consumer complaints to the parties necessary for resolution. Otherwise, the out of context data may create confusion and lead to false conclusions. When the CFPB started publishing its Monthly Complaint Report with "Top Most Complained about Companies," consumers understandably may have developed a negative impression of the companies on the list. As the J.D. Power survey shows, this impression is not only unsupported, but also might be inaccurate.	Processes	Data Accuracy	The format of public reporting from the complaint system has not yet been determined. FSA will take this comment into consideration during report design in order to ensure that reports accurately represent the data collected.
114	ED-2015-ICCD-0138-0022	IV. Adopt informed disclosures to promote transparency We are concerned about a variety of issues currently diminishing the CFPB Database's utility and, worse, potentially misinforming consumers. As the Department builds a new Enterprise Complaint System from scratch, there are bound to be issues affecting the reliability of the data. For this reason, we urge the Department to adequately and visibly publish proper disclosures. After meeting with our members this past fall, the CFPB added the following disclosure to the database website and Monthly Reports: "Company-level information should be considered in context of company size and/or market share."14 We applaud the CFPB for working with industry and making this common sense improvement. Other agencies have also included disclosures to enhance the transparency of the data. The CPSC discloses on its complaint website that the information is unverified by stating: "CPSC does not guarantee the accuracy, completeness, or adequacy of the contents of the Publicly Available Consumer Product Safety Information Database on SaferProducts.gov, particularly with respect to information submitted by people outside of CPSC." This disclosure helps to mitigate inherent government endorsement of the complaint, which may result from being posted on a governmental website. Further, we suggest the Department encourage a collaborative – not adversarial – relationship between customers and their institutions. The Federal Communications Commission ("FCC") takes this approach by publishing the following statement on their complaint website: "You should always try to resolve the problem first with the company whose products, services or billing are at issue. However, if that does not succeed, you may file a complaint with the FCC." We ask the Department to follow these good examples to promote transparency and collaboration between the consumer and the educational, or financial institution.	Processes	Data Accuracy	The format of public reporting from the complaint system has not yet been determined. FSA will take this comment into consideration during report design in order to ensure that reports accurately represent the data collected.
115	ED-2015-ICCD-0138-0022	Collection and Coordination in the Complex Student Lending Market In addition to representing the lenders holding a majority of the more than $91 billion fully private student loan market, CBA membership includes several current and former participants in the Federal Family Education Loan Program ("FFELP"). CBA member banks devote extensive time and resources to complaint resolution, including FFELP servicing issues, and continuously strive to ensure the success of their student borrowers. To this aim, we offer the following insights as the Department evaluates the role and structure of its Enterprise Complaint System. I. Limit Compliant Enterprise System to Complaints about Federal Loans The Presidential Memorandum on the Student Aid Bill of Rights limited the complaint intake function to those related to federal student loans. We urge the Department to follow this directive and confine the intake to only federal student loans. With the CFPB already collecting complaints on private student loans, the Department must clearly define the federal student loans under its jurisdiction and eliminate the possibility of duplicating the collection private student loan complaints. Currently, the CFPB separates federal and private student loan complaints and immediately routes those identified by customers as relating to federal student loans to the Federal Student Aid ("FSA") Ombudsman. We suggest the Department follow that example and immediately route complaints that include any concerns about private loans to the CFPB for its sole handling with respect to such concerns, in order to avoid double counting and uncertainty about who should respond to the consumer.	User Experience	Complaint Types	ECS is only for the Title IV aid experience, i.e., activities related to Federal student aid, which does not include private loans. Customers with complaints related to private loans will be directed to the CFPB's complaint portal.
116	ED-2015-ICCD-0138-0022	II. Create Complaint Triage Procedure and Promote Inter-Agency Coordination With the CFPB Database, the FSA Ombudsman, and the FTC's Consumer Sentinel Network, there are already multiple avenues for student loan borrowers, both private and federal, to file a complaint and seek resolution. The CFPB collects and publishes unverified complaints on private student loans through its Database. The resulting data is then often featured in the CFPB's press releases and reports as noted above. The FSA Ombudsman seeks to resolve disputes related to Direct Loans, FFEL Program loans, Guaranteed Student Loans, and Perkins Loans. By verifying complaints and engaging both parties, the FSA Ombudsman works to find a resolution without choosing to publicly disclose such complaints – and risking the release of sensitive information. Furthermore, the FTC Consumer Sentinel Network is a venue borrowers can use for debt collection matters. With such resources already available to consumers, the Department must define the role of its Enterprise Complaint System to avoid creating duplicative complaint mechanisms.	Processes	Routing	ECS is intended for feedback related to the federal financial aid experience associated with a Title IV policy, process, service, or entity.
117	ED-2015-ICCD-0138-0022	III. Differentiate lenders, servicers, guarantors, and debt collectors Before launching the Enterprise Complaint System, the Department should clarify how it plans to ensure complaints properly correspond to the borrower's problems in various aspects of the life cycle of the loan. Borrowers in delinquency and/or default are likely to have contact with multiple companies (lenders, guarantors, servicers, debt collection agencies, etc.) throughout the process. The proposed Enterprise Complaint System must clearly delineate the entity at the source of the compliant to better inform consumers and aid dispute resolution.	Processes	Routing	Customers will be able to select the entity at the source of their complaint during complaint submission. If this selection is determined to be incorrect, it will be changed during complaint management and resolution.
118	ED-2015-ICCD-0138-0023	Thank you for the opportunity to comment. Providing an opportunity to complain or address concerns is positive and ED is to be commended for this plan. The few key points that I am submitting for comment with more detail below are: Accuracy of the complaint, Linking CFPB And ED so a complaint appears only once, Suggestion to not make the complaint detail public information, Add additional categories such as complaint, dispute, request for information. There is a concern relating to the accuracy of the data provided by the consumer in the complaints. For example, we have documented cases where complaints made on the CFPB website are false and misleading. One specific case is a consumer complained of profanity and racial slurs. However, the telephone recordings shows the consumer was the party using profanity etc. Having been in the collection industry for 38 years, the majority of consumers embellish so it is essential the complaints be accurate. Perhaps a statement similar to "This information is accurate to my knowledge"	Context	Context	Thank you for your comments.
119	ED-2015-ICCD-0138-0023	We suggest ED and the CFPB link their data so a complaint whether made on CFPB or ED only show as one complaint not two. So, if someone logs on CFPB and states this is in regard to a student loan forward the complaint to the ED website.	Collaboration	CFPB	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel, and the Consumer Financial Protection Bureau.

#	Docket	Comment	Category	Subcategory	Response
120	ED-2015-ICCD-0138-0023	We urge the nature of the complaint be kept private, not publicly displayed. In a conversation with CFPB, consumers are potentially liable for slander and may be sued if they publicly lie as to the circumstances of a complaint if the information is public. Please keep in mind potential clients, consumer attorneys, clients etc. may view the complaint database and cause damage to the business as a result of an inaccurate or misrepresented circumstances.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
121	ED-2015-ICCD-0138-0023	Lastly, we suggest all complaints not be classified as a complaint. Clearly some issues are disputes or requests for information and do not rise to the level of a formal complaint.	User Experience	Complaint Types	Submissions that are determined to be disputes better resolved by the Ombudsman process will be seamlessly transferred to the Ombudsman Case Tracking System and the customer will be notified.
122	ED-2015-ICCD-0138-0024	The Student Loan Servicing Alliance (SLSA) is a non-profit trade association made up of approximately 25 major student loan servicers whose members service both federal student loans and private education loans. Student loan service providers are responsible for a range of services in terms of collecting student loans, including the processing of loan applications, communications with consumers, the provision of disclosures and billings, and the processing of payments. SLSA is pleased to submit the following comments in connection with the proposed design and implementation of the Enterprise Complaint System (ECS) (Docket No: ED-2015-ICCD-0138): ECS data should be compiled and shared in proper context. In response to the Department's request, "how might the Department enhance the quality, utility, and clarity of the information to be collected," we believe it is important to report complaints with a proper perspective. On a monthly basis, SLSA members receive millions of calls, written communications, electronic inquiries and requests. These interactions provide our membership with an opportunity to support borrowers' needs and gather important feedback, which facilitates continuous improvement of servicers' practices, training, systems, and communications for their customers. In our members' longstanding experience in administering the federal loan programs, elevated inquiries, many of which do not result in actionable complaints, represent a very small percent of total annual inquiries. We urge the Department to compile and report ECS data with proper context and perspective to ensure complaint data portrays an accurate perception of the federal loan servicing environment and our members' ability and efforts to meet borrowers' needs. Anonymous complaints should not be permitted, or if permitted, should not be counted against the organization, or accounted for in a different manner. Servicers are concerned that permitting anonymous complaints will preclude them from investigating issues raised by the borrower and will therefore not result in a response or satisfactory solution for the borrower. In addition, permitting the use of anonymous complaints may unintentionally encourage misuse of the complaint process by complainants seeking to "send a message" on a particular issue. Therefore anonymous complaints should not be included in an organization's complaint total. We do commend Federal Student Aid (FSA) for its use of pop-up boxes to warn the borrower of the consequences and problems with filing anonymously, but we would strongly prefer that all complainants be identified so that we can help borrowers resolve their complaints and to maintain the integrity and effectiveness of the ECS.	Security	Authentication	The format of public reporting from the complaint system has not yet been determined. FSA will take this comment into consideration during report design in order to ensure that reports accurately represent the data collected.
123	ED-2015-ICCD-0138-0024	Encourage borrowers to contact their servicer prior to filing a complaint with the Department. One of the shortcomings of the Consumer Financial Protection Bureau's (CFPB's) consumer complaint portal is that borrowers are not encouraged to contact their lender or loan servicer before filing a complaint with the Bureau. Servicers have found that many of the complaints filed with the CFPB have not been previously brought to the attention of the lender or servicer. Given that our goal is to resolve customer complaints as expeditiously as possible, and given that the large majority of student loan complaints can be resolved simply by providing an explanation, we believe that encouraging borrowers to contact their servicer first will help resolve many issues faster. One suggestion is to add a question/field to ask if the borrower has contacted their servicer to discuss their issue prior to filing this complaint, with encouragement to do so.	User Experience	Submission Flow	Borrowers will be encouraged to contact their servicer on a revised 'Contact Us' page that will serve as the primary gateway to the ECS customer portal, as well as through explanatory text in the dynamic 'knowledgebase' on the right hand side of the portal.
124	ED-2015-ICCD-0138-0024	Inquiry vs. complaint. Federal student loans have numerous and complex terms and conditions in connection with repayment options, deferments and forbearances. The complexity of the program is reflected in the number of inquiries that student loan servicers receive regarding loan balance, information reported to consumer reporting agencies (CRAs) interest accrual, obligation to repay, payment calculation and payment application. We would urge FSA to recognize this characteristic of student loans and to attempt to differentiate inquiries from complaints. We do acknowledge that it is worthwhile to track inquiries by topic and refer the information to the servicer to assist such customers in resolving their particular circumstance. However, the Department should differentiate between complaints and inquiries that are general requests for assistance.	User Experience	Complaint Types	A revised 'Contact Us' page will direct customers to the correct location for inquiries (FSAIC) vs complaints (ECS) and Ombudsman issues. Additional information regarding this topic will be provided through a dynamic 'knowledge base'.
125	ED-2015-ICCD-0138-0024	Need for verification of complaints. We understand that the FSA Ombudsman's Office will monitor all complaints and will act as the liaison for complaints about Federal Family Education Loan Program (FFELP) and Perkins loans. We applaud this feature of the Enterprise Complaint System, which is very different from the CFPB's consumer complaint portal. Currently the only validation performed by the CFPB on complaints filed through its portal is to "take steps to confirm a commercial relationship between the consumer and company." The lack of validation by the CFPB increases the overall number of filings without providing any real sense of whether the complaint is actionable and can be resolved, or whether it should be categorized as an inquiry. Coordination between the Enterprise Complaint System and the existing servicer complaint reporting system. FSA currently requires its contract servicers to provide monthly reporting of ED customer complaints. We assume that the new ECS system will replace other existing monthly reporting. If this is not the case, we recommend that the complaint categories between processes be aligned for accuracy and efficiency. Any duplicate complaints from these processes should be identified and tracked as a single servicer instance. And we again urge FSA not to include anonymous complaints in terms of the number of complaints attributed to a servicer.	Processes	Complaint Resolution	While this system is currently not intended to replace other existing monthly complaint reporting, FSA does plan to explore ways to align the existing processes to improve accuracy and efficiency after implementation. The format of planned or possible reports, has not yet been determined, but the suggestion related to anonymous complaints will be taken into consideration.
126	ED-2015-ICCD-0138-0024	Ability to correct or redirect complaints that relate to the wrong party. It is an unfortunate reality that borrowers do not always know who their servicer is. In addition, many of FSA's Direct Loan servicer contractors also service commercial FFELP loans under the same name. Therefore, it is highly likely that there will be confusion and mistakes in complaint attribution, both among separate entities, and within an entity that services both Direct Loan (DL) and FFELP loans. For that reason, we recommend that FSA create a mechanism within the ECS to re-direct a complaint when it is incorrectly attributed to the wrong party. If it is determined that a complaint has been misdirected to an incorrect party, FSA should have a process in place that provides for assigning the complaint back to FSA to ensure it is addressed by the correct party. This capability will ensure that data is accurately compiled and reported.	Processes	Routing	Customers will be able to select the entity at the source of their complaint during complaint submission. If this selection is determined to be incorrect, it will be changed during complaint management and resolution. If a servicer determines that a complaint was incorrectly routed to it, that servicer will be able to re-route the complaint to FSA for recategorization (i.e., a servicer will not be responsible for determining the correct entity for complaints over which it does not have responsibility).
127	ED-2015-ICCD-0138-0024	Access to ECS for servicers of commercial FFELP loans and Perkins loans. It is our understanding FSA's contractor servicers will have direct access to the Enterprise Complaint System to view and respond to borrower complaints, but that complaints regarding FFELP and Perkins loans will continue to be handled through the Ombudsman's office, as they are today. If this understanding is not entirely correct, in order to comment intelligently, we would like additional information on how the ECS will work for FFELP and Perkins loans.	Processes	Integration	This understanding is correct.
128	ED-2015-ICCD-0138-0024	Complaints related to statutory and regulatory requirements that are not within the servicer's ability to address or change. Many of the complaints that servicers receive today involve statutory, regulatory, or policy requirements that are beyond our power to resolve. For example, one of the most common complaints by borrowers concerns the interest rate on their federal student loans, which is set by statute. We recommend that FSA manage these types of complaints in such a way that the ECS will be able to track these types of issues and provide data annually on topics and concerns expressed by borrowers. It is our belief that the vast majority of complaints received by servicers are, in fact, related to the complex rules of the loan programs – servicers have provided estimates that half to three-quarters of their complaints are related to program requirements (either statutory, regulatory or policy).	Processes	Complaint Resolution	Complaints related to federal regulation, legislation, and policy will be handled by the Department.
129	ED-2015-ICCD-0138-0024	Servicer responses to complaints and timeline for responding to complaints. The Request for Comment does not include any information about how the servicer response function will work or the timeline for responding to complaints. For example, will servicer responses be viewable on the website by the borrower, and will they be viewable by other consumers? Will there be a timeline for servicer response? The CFPB's consumer complaint portal requires a response within fifteen calendar days. This response time is too limited in some instances – particularly when there is a long weekend due to a Federal holiday and over Thanksgiving, Christmas and New Year holidays, when there can be multiple days when the organization is closed. We need time to adequately investigate and respond to borrower complaints. In this regard, the Fair Credit Reporting Act (FCRA) allows 30 (calendar) days to investigate and respond to direct consumer disputes involving the accuracy of credit reporting. Therefore we would recommend a minimum of 15 business days in terms of investigating and responding to complaints registered through the ECS.	Processes	SLAs	Users will be provided servicer responses to their own cases but servicer responses will not be viewable by other customers at the present time. FSA will consider the timing recommendation when developing formal obligations for ECS.
130	ED-2015-ICCD-0138-0024	Taxonomy Issues. Which subcategories appear under each category? Which issue sub-types appear under each issue? It is difficult to provide the requested feedback without seeing a more detailed view of the site's taxonomy.	User Experience	Complaint Types	Taxonomy information was provided. It is currently being revised in response to feedback received.
131	ED-2015-ICCD-0138-0024	Complaint Screenshot (3.1.1). It does not appear that there is a drop-down list of choices in response to the question "Who is your complaint about?" We believe that a drop-down list with the various (Department of Education) ED Contact Centers, such as the Default Resolution Group (DRG), would be helpful here. In addition, it is not clear whether borrowers must answer the questions regarding the identity of their servicer and collection agency, and whether a "Not Applicable" answer will be possible. These two questions are mutually exclusive in many instances -- if a borrower has a servicer issue then it is unlikely that they have ever been contacted by a collection agency, and likewise, the identity of the borrower's servicer is irrelevant once the loan is defaulted and they are dealing with a guaranty agency (for FFELP) or collection agency. In addition, we noted that DRG is not listed in the collection agency list. Does DRG staff make any attempts to collect the loans? Likewise, the ECS does not offer the option of selecting a guaranty agency.	User Experience	Complaint Types	Only the applicable dropdowns, based on the complaint categorization, will display. Not all dropdowns will display on the page.
132	ED-2015-ICCD-0138-0024	The subcategories in the Table of Complaint Subcategories (3.1.4) may benefit from further definition. As one example, a borrower may be uncertain about whether to use "School Closure" or "Loan Discharge/Cancellation/Forgiveness" as the subcategory if they want to file a complaint about a closed school discharge. FSA may also wish to list the applicable subcategories in order of most-common-to-least-common type of complaint rather than alphabetical, as the borrower may click on the first category that seems to fit without reviewing the entire list. Also, in terms of discharges and forgiveness, FSA has listed one discharge program (Total and Permanent Disability (TPD)) and one forgiveness program (Public Service Loan Forgiveness (PSLF)) separately from the general subcategory of Loan Discharge/Cancellation/Forgiveness. We understand your reasoning in doing this, as both of the programs listed separately use specialty servicers. Perhaps using a definition for the general subcategory that excludes these two programs would be helpful, as would including a list of the various loan discharge/cancellation/forgiveness programs that ED offers.	User Experience	Complaint Types	FSA will take this into consideration when revising complaint language.
133	ED-2015-ICCD-0138-0024	In order to minimize borrower confusion, we think that all of the Complaint Categories and Issue Types would benefit from providing definitions or descriptions of each Complaint or Issue Type. In particular, there are a couple of issue types in the Table of Issue Types (3.1.5) that are not clear to us and that we think could benefit from further definition. What is the difference between a "Customer Service Interaction" and an "Action, Outcome, or Communication?" Is the former intended to be limited to a phone call with a customer service representative, and the latter all other types of interaction?	User Experience	Complaint Types	Explanatory text will be provided in the dynamic knowledge base during the complaint submission process. The provided interpretation of 'Customer Service Interaction' and 'Action, Outcome, or Communication' is broadly correct, but FSA is exploring ways to revise this language to ensure ease of use for customers.
134	ED-2015-ICCD-0138-0024	Servicer List. We understand that the information provided is still a draft, but several FFELP servicers appear to be missing from the list in the Table of Servicers (3.1.7), and one servicer is listed twice. Will Perkins loan servicers be included as well? We understand FSA's desire to list its contractors first with the "ED" notation, given that Direct Loans now make up the majority of outstanding federal loans, but we are concerned that including all servicers in one large drop-down list may be confusing to borrowers. In particular, borrowers with both FFELP and DL may simply stop at the first servicer name they recognize, which would be the ED contractor, without realizing that FFELP servicers are listed later. That will result in the DL servicers having complaints incorrectly attributed to them. For that reason, as discussed above, we think there needs to be a mechanism to reassign complaints that name the wrong organization, or the wrong arm of an organization. In addition, we would suggest considering the use of an initial drop-down box that asks the borrower to choose the appropriate loan program (DL, FFELP, or Perkins) with a separate drop-down box with servicer names under each loan program. We do acknowledge that this may not solve the problem entirely, as some borrowers may not know the loan programs from which they borrowed. For that reason one of the choices in the initial loan program drop-down box may need to be "I don't know." Finally, the list of servicers should be alphabetical (it is not right now), and we hope that servicers will be able to review the format of the name provided in any drop-down list to be sure that it is the name they use with their borrowers and therefore one that a borrower would recognize. Some organizations may want to add initials in parentheses after their proper name, and some may only want to use their acronym.	User Experience	Complaint Types	Not all servicers will be listed in the drop down at one time. The servicers displayed are based on the complaint categorization. The servicers will be listed alphabetically.
135	ED-2015-ICCD-0138-0024	Need for additional licenses. It is our understanding that FSA has purchased 30 licenses for its contractor servicers to use in accessing the Enterprise Complaint System, and intends to distribute three licenses to each servicer. Successful and timely resolution of inquiries and complaints will be dependent on having adequate access to ECS. We recommend that FSA plan for up to 10 licenses for each servicing entity.	Processes	Partner Licenses	The number of partner licenses provided to servicers has been increased.

#	Docket	Comment	Category	Subcategory	Response
136	ED-2015-ICCD-0138-0025	The Coalition of Higher Education Assistance Organizations (COHEAO) would like to submit a comment in response to the comment request under the Paperwork Reduction Act of 1995 regarding the Department of Education's proposed Enterprise Complaint System. COHEAO is a diverse association whose members include institutions of higher education and their service providers from around the country with a shared interest in fostering access to postsecondary education for students from low-income backgrounds. COHEAO represents the individuals who manage campus-based student loan programs. COHEAO believes that the goals stated in the notice of this comment request, derived from the White House's Student Aid Bill of Rights announcement of March 10, 2015, are worthy and on their face seem beneficial to students. We would like to offer comments that hopefully will encourage an outcome that is helpful to students and their families, not duplicative of other agencies' activities, and leads to the provision of accurate, understandable information for the public. We have the following questions and concerns: 1. How will the new Enterprise Complaint System (ECS) be different from the system where complaints are now filed with the Department of Education Ombudsman?	Processes	Integration	The Ombudsman is the office responsible for managing ECS. The Ombudsman process is intended for complaints that may require more substantive research or dispute resolution actions, while ECS is intended for feedback, positive and negative, that may not rise to that level. Complaints submitted to ECS that, upon review, are better placed in the Ombudsman process, will be seamlessly transferred to the Ombudsman Case Tracking System (OCTS) with no action required on the part of the customer. The customer will be notified in this scenario.
137	ED-2015-ICCD-0138-0025	2. Will the Ombudsman complaint system be incorporated in the ECS? If not, how will duplication of effort be avoided?	Processes	Integration	ECS will not replace the Ombudsman. Functionally, ECS will be managed by the Ombudsman team within FSA. The Ombudsman process provides customers with a dispute resolution mechanism, while the Complaint System is intended for feedback that may not rise to the level of requiring dispute resolution. Systematically, the Enterprise Complaint System is an extension of functionality of the Ombudsman Case Tracking System. For this reason, data integration between the two processes is extremely simple. Cases may be transferred relatively easily between the two processes as required. If this occurs, the customer will be notified.
138	ED-2015-ICCD-0138-0025	3. If there are plans to track and report the complaints, we recommend that there be reports issued by the Department showing how issues are resolved.	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined. This recommendation will be taken into consideration during the report design process.
139	ED-2015-ICCD-0138-0025	4. Will the volume of complaints be normalized based on the size of the school and the number of loan recipients? The largest schools and the largest servicers or collection agencies could have the highest number of complaints but actually have relatively few complaints per student or per borrower. It will be important to take this into account rather than simply reporting raw numbers.	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined. This recommendation will be taken into consideration during the report design process.
140	ED-2015-ICCD-0138-0025	5. We recommend that complaints be validated before being published either individually or in aggregate. Such validation will provide consumers with worthwhile information and help identify real problem areas while avoiding gaming by special interests. Safeguards like those employed by some social media product or service evaluation sites should be considered.	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined. This recommendation will be taken into consideration during the report design process.
141	ED-2015-ICCD-0138-0026	On behalf of the Student Loan Ombudsman Caucus, thank you for the opportunity to provide the attached comments on the proposed information collection request for the new Enterprise Complaint System (ECS). The membership of the Student Loan Ombudsman Caucus includes, but is not limited to, ombudsmen staff of members of the National Council of Higher Education Resources (NCHER) – a national trade association representing organizations that support the student aid industry – and other student loan industry participants. The Caucus provides problem resolution, training, and mentoring in an effort to influence and support positive change through industry best practices, legislation, and regulations and to serve as a voice of fair process throughout the student loan life cycle. Our comments on the ECS focus on alignment with current complaint tracking and accuracy, ECS licenses, misdirected inquiries, response timelines, loan holder selection, information sharing, anonymous and regulatory complaints, suspicious activity, and compliments. On a monthly basis, our members receive millions of calls, written communications, electronic inquiries and requests. These interactions provide our members an opportunity to support borrowers' needs and gather feedback to improve practices, training, systems and communications. Our members also take all complaints very seriously. In response to the Department's request for 'how might the Department enhance the quality, utility and clarity of the information to be collected', we believe it is important to report complaints with a proper perspective – including but not limited to the level of validity. In our membership's longstanding experience in administering the federal loan program, elevated inquiries may be representative of issues beyond our control. Compiling ECS data with proper context and perspective will ensure complaint data portrays an accurate perception of federal loan servicing that our membership works very hard to enhance the overall borrower environment. We look forward to continuing our work and partnership with the Department of Education and, specifically, the Office of the Ombudsman to ensure that all students and borrowers have access to fair, timely, and expert assistance. 1) Alignment of Current FSA Customer Complaint Tracking Report and Accuracy of ECS Complaint Category Assignment Per the Federal Register notice, Docket No.: ED-2015-ICCD-0138, reference is made to the request under Supplementary Information whereas the Department of Education (ED) is interested in public comment addressing the following issues: (1) Is this collection necessary to the proper functions of the Department; (2) will this information be processed and used in a timely manner; (3) is the estimate of burden accurate; (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology. Specifically addressing issues (4) and (5): ▪ The ECS Implementation draft document provides a vast amount of complaint categories and complaint subcategories available to customers through ECS. We have a concern regarding the customer's potential inability to self-select appropriately. It is our assumption the categories will be communicated in language customers will understand, avoiding any industry jargon and providing definitions for each category. We recommend that, after the appropriate review of the complaint, if necessary, servicers/guarantors have the ability to assign/document the root cause of the complaint to ensure accuracy and which will in turn be used as the final reporting documentation of record.	User Experience	Complaint Types	The assumption related to communications is correct. While working a case, servicers will be able to document additional information as deemed necessary on the case itself.
142	ED-2015-ICCD-0138-0026	Our assumption is that once ECS is implemented, other reports (e.g., the Ombudsman Report) will no longer be required as it will be captured through ECS. If that is not a correct assumption and other reports will continue to be required, since ECS complaint categories and subcategories differ from the existing report categorizations, we recommend duplicate reporting be eliminated by aligning ECS reporting and the other reports into one condensed reporting requirement.	Reporting	Other Reports	The directive from the President's Student Aid Bill of Rights to publish an annual complaint report does not replace FSA's statutory requirement in the Higher Education Act, as amended, to publish an annual Ombudsman report.
143	ED-2015-ICCD-0138-0026	2) ECS Licenses: ▪ It is important to ensure adequate access to the new ECS. We recommend 10 licenses be granted to each servicer to ensure that servicers are able to maintain their current level of service to customers.	Processes	Partner Licenses	The number of partner licenses provided to servicers has been increased.
144	ED-2015-ICCD-0138-0026	▪ Assuming guarantors will be granted the same amount of access, we recommend five licenses and/or an option to request additional log-ins on a case-by-case basis. If this assumption is not correct, and guarantors do not have access to the new ECS, the process would operate under the current FSA Ombudsman process. If using this process, it is recommended that any duplication of complaints (such as complaint via ECS and FSA Ombudsman) be coordinated by the FSA Ombudsman office and the guarantor/servicer will only receive one referral.	Processes	Partner Licenses	Complaints will not be automatically routed to guaranty agencies in the first iteration of ECS. For this reason, guaranty agencies will not need direct access to ECS. Complaints related to guaranty agencies will be reviewed by FSA and forwarded if necessary for review and resolution.
145	ED-2015-ICCD-0138-0026	3) Misdirected Inquiries: Based upon current industry customer feedback portal experience and in an effort to maximize efficiency and provide the best possible customer experience, if upon researching it is found the initial complaint is misdirected, we recommend a process be in place to return the inquiry back to ED so it can be forwarded to the appropriate party.	Processes	Categorization	If a complaint is misdirected to an entity outside of the Department, that entity will be able to return it to the Department for review and recategorization.
146	ED-2015-ICCD-0138-0026	4) Response Timeline ▪ We assume the response time frame provided to the customer will be reasonable and communicated to both the customer and servicers/guarantors. We recommend an email be sent to the customer acknowledging receipt of their complaint and allow up to 10 business days to research and respond.	Processes	SLAs	An automatic email confirmation will be provided to customers who provide their contact information. When the status of a complaint has changed (e.g., the complaint has been forwarded to another unit within FSA for follow-up), this change will be reflected in the case management tool and the customer will receive an email detailing information about this step. In this way, the customer will be able to determine where their complaint is in the response process. FSA will consider the timing recommendation when developing formal obligations for ECS.
147	ED-2015-ICCD-0138-0026	5) Loan Holder Selection ▪ We appreciate the opportunity for a borrower to self-select their servicer and/or collection agency (3.1.7 and 3.1.8); however, we are concerned that guaranty agencies are not listed. We believe, if the complaint is going to be referred to the loan holder to resolve, the guaranty agency is the best resource on a Federal Family Education Loan Program (FFELP) defaulted loan.	Processes	Routing	Complaints will not be automatically routed to guaranty agencies in the first iteration of ECS. For this reason, guaranty agencies will not need direct access to ECS. Complaints related to guaranty agencies will be reviewed by FSA and forwarded if necessary for review and resolution. Complaints related to FFELP loans will be managed by Departmental resources.
148	ED-2015-ICCD-0138-0026	6) Information Sharing ▪ The ECS Implementation draft document reflects that ED will be gathering critical information during the ECS process. We appreciate the opportunity for borrowers to provide this information and recommend establishing a procedure to ensure the following information is transferred on a timely basis to the loan holder: o Third Party Authorization. o Any document(s) uploaded by the borrower. o Contact information, including preferred method of contact and preferred hours of contact.	Processes	Routing	Third parties will be required to complete a "Third Party Authorization Form" anytime they speak on behalf of someone else after the initial complaint submission. Supporting documentation provided by the complainant and their contact information will be provided to the loan holder as necessary.
149	ED-2015-ICCD-0138-0026	▪ We recommend the wording in 2.1.2 be clarified to take into consideration loan holders will be located in time zones other than eastern and preferred hours and method of contact requested may not always be feasible.	User Experience	Plain Language	The request related to preferred hours of contact has been removed.
150	ED-2015-ICCD-0138-0026	7) Anonymous Complaints ▪ As loan holders, we believe it is critically important to be able to identify an individual in order to properly address their concerns and come to a resolution; however, if there is an unlimited number of anonymous inquiries submitted from a single individual, we recommend this information be tracked separately and as unsubstantiated and not used for official reporting purposes. An anonymous complaint may only identify one side of the issue and not allow the loan holder to provide a complete and accurate accounting of events.	Security	Authentication	The format of public reporting from the complaint system has not yet been determined. FSA will take this comment into consideration during report design in order to ensure that reports accurately represent the data collected.
151	ED-2015-ICCD-0138-0026	8) Regulatory Complaints ▪ We appreciate the Common Questions section and believe it may decrease the number of complaints filed; however, we believe many will still file a complaint through the ECS and would like to assure regulatory complaints, outside of the loan holder's control, will be handled by ED. o Examples: interest rates, limited PLUS loan repayment options, requests for forgiveness discharge and settlements that do not meet current regulatory criteria etc.	User Experience	Complaint Types	Complaints related to federal regulation, legislation, and policy will be handled by the Department and will not be auto-forwarded to servicers.
152	ED-2015-ICCD-0138-0026	9) Suspicious Activity ▪ The ECS Implementation draft document allows a borrower to report suspicious activity. We recommend establishing a procedure in which ED would notify a loan holder if action, such as a hold, is required.	Processes	Routing	If any action is required on the part of a loan holder as a result of customer feedback, that loan holder will be notified.

#	ID	Comment	Category	Subcategory	Response
153	ED-2015-ICCD-0138-0026	10) Compliment ▪ We appreciate the opportunity for a borrower to submit a compliment in section 3.3.3. If the borrower selects a specific loan holder, we recommend the compliment be shared with the loan holder.	Processes	Routing	FSA will take this recommendation into consideration when developing formats for reports.
154	ED-2015-ICCD-0138-0027	Navient is pleased to respond to your request for information regarding the Department's Enterprise Complaint System. As the nation's leading loan management, servicing and asset recovery company helping more than 12 million student loan customers navigate the path to financial success, we take seriously our commitment to capture and respond to customer feedback and appreciate the opportunity to share our insights and perspectives on the topic. On a monthly basis we receive 4 million calls, written communications, and customer requests in our call and servicing centers, and through Navient.com. Each of these interactions provides Navient with an opportunity to support our customers' needs and gather important feedback. In addition, customer feedback is captured through a number of other techniques including customer surveys, focus groups, social media, monitoring website flows, quality assurance reviews of telephone and written communications, and from communications forwarded to our Office of the Customer Advocate (OCA), through the Consumer Finance Protection Bureau (CFPB) portal, and the Department of Education. We use this valuable customer feedback to continuously improve our servicing practices, training materials, policies, customer-facing systems, and customer communications. The attached comments are in support of the Department's efforts to create a system that will provide students and borrowers a simple way to provide feedback about their federal student loan experience and ensure all inquiries, including complaints and compliments are identified and directed to the right party.	Context	Context	Thank you for your comments.
155	ED-2015-ICCD-0138-0027	ECS Structural Design: We recommend that the ECS be designed to differentiate customer complaints from other forms of communications, such as requests for assistance, general loan program communications, and other inquiries. Regarding inquiries or requests for assistance, often these inquiries pertain to customers who communicate difficulty making payment or communicate concerns about information reported to a consumer reporting agency (CRA). The customers may not have previously sought assistance from the lender or servicer and often explicitly state they are not submitting a complaint but rather are seeking assistance. We suggest the portal allow customers to specify whether they are filing a complaint or inquiry. For customers that demonstrate reduced ability to pay, we work with the customers to review their current situation and help them select a plan from one of the many federal loan repayment options available. Notwithstanding disputes, which are investigated and addressed as applicable, for customers that communicate concerns about credit reporting, our experience in this area is that the information reported to a CRA has been accurate, and in these instances we are constrained by the requirements of the Fair Credit Reporting Act, which precludes retraction of accurately reported information. Classifying these types of communications as complaints can misinform customers about a servicer's support in the event of a hardship, or can incorrectly suggest that servicers have the option to selectively correct accurately reported information. Navient requests that the Department refer to us information pertaining to customers who seek assistance through the ECS following existing practices, and we remain committed to contacting such customers to assess how we may help resolve their particular circumstances. However, the Department should delineate between complaints and inquiries, with inquiries being, as example, requests for assistance or a general servicing request. With respect to general loan program communications, often it is the case that such inquiries pertain to specific program requirements established by statute and federal regulations, such as interest rates, prescribed repayment plan features, and eligibility requirements for various entitlements such as deferment, loan forgiveness, and discharge. Furthermore, in our experience working with customers, there are instances where the customers stated they were not filing a complaint, but rather were providing their perspectives on a national policy matter. We recommend that communications due to these kinds of specific causes, be managed directly by the Department and reported annually on the kinds of topics and concerns expressed by borrowers.	Processes	Complaint Resolution	Customers are instructed that ECS is not used for general inquiries on the ECS landing page, and language to distinguish ECS from the Ombudsman or Federal Student Aid Information Center (FSAIC) will be provided on a revised Contact Us page as well as in the dynamic knowledgebase.
156	ED-2015-ICCD-0138-0027	Accurate Data Context: With respect to how the Department might enhance the quality, utility, and clarity of the information to be collected, we strongly encourage the Department to be mindful of the importance of presenting data from the ECS in relation to an entity's total volume of transactions for a designated time period. In our experience, complaints as opposed to other communications and requests for assistance represent a very small percent of Navient's annual inquiries. Without proper context and perspective, complaint data can be misleading and portray an inaccurate perception of the federal loan servicing environment.	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined. This recommendation will be taken into consideration during the report design process.
157	ED-2015-ICCD-0138-0027	Ensure Sufficient ECS License Designations: Page 6 of the Supporting Statement presents an annual software licensing cost of $500,000; however it is unclear from this figure how many licenses will actually be available and assigned to each servicing entity. Successful and timely resolution to inquiries will be dependent on having adequate access to the ECS. We recommend planning for at least 10 licenses for each entity, as well as having the ability to add addition capacity in a timely manner to address peak processing periods as may be necessary.	Processes	Partner Licenses	The number of partner licenses provided to servicers has been increased.
158	ED-2015-ICCD-0138-0027	Treatment of Anonymous Complaints and Limitations: Having a thorough understanding of specific facts and circumstances of an issue is critical to not only resolution but also the accuracy of the official data that will be compiled and reported. Although Navient takes all complaints seriously, complaints that are submitted anonymously should be totaled by the Department but not assigned to a particular entity. In other words, if a complaint cannot be attributed to a valid customer for review, it should not be reported as an issue or concern with an entity. Without this separation and balanced perspective, reporting will be inaccurate and biased. In addition, we note on page 3 of the Supporting Statement that the Department expects there to be "no limit to the number of submissions that a customer may provide." Having a system that could be used in an unlimited and anonymous manner further supports the need to ensure that anonymous complaints are separated and excluded from the reporting of complaints that can be validated.	Reporting	Other Reports	The format of public reporting from the complaint system has not yet been determined. FSA will take this comment into consideration during report design in order to ensure that reports accurately represent the data collected.
159	ED-2015-ICCD-0138-0027	Eliminate Duplicative Reporting: With respect to the request for how the Department might minimize the burden of this collection, we anticipate that the new ECS system will replace other existing monthly reporting. If this is not the case, we recommend aligning the two processes to ensure consistent complaint categories and subcategories for accuracy and efficiency, and request that any duplicate complaints from both processes be identified, tracked and reported as a single instance.	Reporting	Other Reports	While this system is currently not intended to replace other existing monthly complaint reporting, FSA does plan to explore ways to align the existing processes to improve accuracy and efficiency after implementation.
160	ED-2015-ICCD-0138-0027	Accuracy of Complaint Classifications, Responsible Parties and Assignments: The list of categories and subcategories is quite extensive and may not be clearly understood by borrowers. As a result, we anticipate erroneous selections to occur. We recommend that the ECS provide users with the capability to make adjustments once the correct category of the complaints is determined and the correct responsible party is identified. Furthermore, if research determines that a complaint has been erroneously assigned or misdirected, it will be important to have a process that provides for assigning the matter back to the Department to ensure it is addressed by the applicable party. Having this capability will be critical to ensure that data is accurately compiled and reported.	Reporting	Data Accuracy	Users of ECS who are responsible for managing customer feedback will be able to change the category and responsible party of individual cases. Case re-assignment will occur after the responsible party is changed. Case history, including assignment history, will be captured.
161	ED-2015-ICCD-0138-0027	Time to Obtain Borrower Consent to Work with Third-party Sources: Section 2.1.1. of the ECS Implementation document provides the ability for a third-party to enter a complaint on behalf of a borrower. We interpret this feature to mean that the system will obtain the proper authorization to release borrower information if it is necessary to discuss a complaint with the third-party. If this is not the case, servicers will need additional time to obtain borrower consent before working with a third party.	Security	Third Parties	Third parties will be required to complete a "Third Party Authorization Form" anytime they speak on behalf of someone else after the initial complaint submission.
162	ED-2015-ICCD-0138-0027	Preferred Hours of Contact: Section 2.1.1. of the ECS Implementation document provides the ability to collect a borrower's preferred hours of contact. Although this will be an effective feature to enhance the rate of contact, the range should be aligned to match the availability of loan holders and servicers. We recommend that the ECS screen be modified to offer a range between 8 AM to 5 PM which is a reasonable span of operational availability.	User Experience	Telephony	The preferred hours of contact has been removed.
163	ED-2015-ICCD-0138-0028	On behalf of the National Association of Student Financial Aid Administrators (NASFAA), I am responding to your request for comment on the proposed enterprise complaint system in the Federal Register Notice published on December 10, 2015. NASFAA represents more than 20,000 financial aid administrators at approximately 3,000 colleges and universities; nine out of every 10 undergraduates attend NASFAA member institutions. The Department of Education (ED) states that it will create a new responsive website to give students and borrowers a simple and straightforward way to file complaints and provide feedback about federal student loan lenders, servicers, collection agencies, and institutions of higher education. The supporting documents provided on regulations.gov for comment include email templates and screenshots of the proposed complaint system submission process. Conspicuously absent is any information regarding ED's planned complaint resolution process, which is a key component in the complaint system initiative. Adequate due process for institutions must be incorporated into the resolution procedures and ED should solicit public comment as this process is developed. More detailed comments are offered on the following pages. We appreciate the opportunity to offer these comments and we look forward to working with you on these important issues.	Context	Context	Thank you for your comments.
164	ED-2015-ICCD-0138-0028	1. What will be included in the annual publication?	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined. This recommendation will be taken into consideration during the report design process.
165	ED-2015-ICCD-0138-0028	● How and to whom will the publication be made available?	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined.
166	ED-2015-ICCD-0138-0028	● What data, specifically, will be included in the publication?	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined.
167	ED-2015-ICCD-0138-0028	● Will schools be identified and the nature of complaints against them described?	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined.
168	ED-2015-ICCD-0138-0028	● Will there be a threshold of complaints before a school is included in the publication?	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined.
169	ED-2015-ICCD-0138-0028	● Will the complete resolution process have occurred before it is included in the publication, and what due process will be used to ensure that a complaint is fair and valid?	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined.
170	ED-2015-ICCD-0138-0028	● Does ED plan to make complaints public separately from the annual publication in any way, such as a searchable online database?	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
171	ED-2015-ICCD-0138-0028	2. Will complaints submitted through this system be fed into the new Student Aid Enforcement Unit for resolution and/or for follow-up investigation? If so, what conditions must be met for a complaint to rise to the level of Enforcement Unit involvement?	Processes	Enforcement	FSA anticipates that data collected by ECS will be useful in supporting the new Enforcement unit, but specific processes for doing so have not yet been defined.
172	ED-2015-ICCD-0138-0028	3. According to Supporting Statement Part A posted in the Regulations.gov docket for solicitation of comments, the first annual publication is scheduled on or before October 1, 2016. However, the presidential Memorandum on the Student Aid Bill of Rights requires ED to "publish a report summarizing and analyzing the content in resolution of borrower complaints and feedback received through the process" beginning October 1, 2017, and continuing annually. Since two months from start of functionality to first publication seems too short a time to allow for collection of information and fair resolution of a complaint, are we correct to assume that October 1, 2016, is a misprint, which should be corrected to October 1, 2017?	Reporting	Annual Report	The President's Student Aid Bill of Rights does direct FSA to publish an annual complaint report beginning October 1, 2017. However, in the interest of transparency, FSA may publish an abbreviated complaint report by October 2016. The format of this report has not yet been determined, but its content will reflect the limited timeframe that ECS will have had to collect complaint data. For example, it may include insight into FSA's initial experience with complaint system implementation.
173	ED-2015-ICCD-0138-0028	4. In the Federal Register, ED states that the complaint system "will replace other currently existent but separately operated processes." Which specific current processes will be replaced? Will there still be an ombudsman (it appears so from examples of FAQs)? Will it be an integral part of the complaint system, or how will it be distinguished from the complaint system?	Processes	Integration	ECS will not replace the Ombudsman. Functionally, ECS will be managed by the Ombudsman team within FSA.
174	ED-2015-ICCD-0138-0028	5. Who will arbitrate between FSA and someone complaining that their complaint wasn't handled or that they want a neutral third party, if FSA is taking complaints about FSA?	Processes	Enforcement	This situation falls within the responsibility of the FSA Ombudsman.

#	ID	Comment	Category	Subcategory	Response
175	ED-2015-ICCD-0138-0028	6. What consumer testing will be done on the complaint system website, and who will conduct it? Will consumer testing be complete before the website goes live?	Development	Testing	Usability Testing, which occurred at the beginning of February, included tests by representatives from several consumer advocacy organizations as well as current college students, in addition to subject matter experts at the Department of Education.
176	ED-2015-ICCD-0138-0028	Landing page 1. The complaint and suspicious activity categories invite reports from other parties on behalf of the student. The compliment category does not.	User Experience	Submission Flow	Third parties are welcome to submit compliments on behalf of others and provide this information in the free-form compliment text box.
177	ED-2015-ICCD-0138-0028	Landing page ● Why can negative comments be second-hand but positive comments must be firsthand?	User Experience	Submission Flow	Third parties are welcome to submit compliments on behalf of others and provide this information in the free-form compliment text box.
178	ED-2015-ICCD-0138-0028	Landing page ● Does someone filing on behalf of someone else need that person's permission? If so, where is someone filing on behalf of another person told that and how is it verified?	Security	Third Parties	Third parties will be required to complete a "Third Party Authorization Form" anytime they speak on behalf of someone else after the initial complaint submission.
179	ED-2015-ICCD-0138-0028	Landing page 2. Under "File a Complaint": Will there be links to redirect individuals who need a different service, such as general inquiries or private education loans?	Collaboration	Other	Consumers will be directed to the Consumer Financial Protection Bureau in explanatory text on a revised Contact Us page on StudentAid.gov, as well as in Q+As in a dynamically updated knowledge base on the right hand side of the ECS, if they have a complaint related to private student loans, and to other relevant parties (e.g., their school or their servicer) as applicable.
180	ED-2015-ICCD-0138-0028	Landing page ● The screen includes a statement that the complaint system will not handle issues challenging the validity of federal law: Most people don't know what federal law requires or prohibits. As a result, this might yield "I need aid but they told me I couldn't have any" complaints from individuals who do not understand the statutory or regulatory requirements for the receipt of aid or calculation of EFC. Could there be links to someplace that explains, in plain language, the requirements?	User Experience	Complaint Types	Knowledgebase articles will be provided within the submission flow to provide information on FSA processes and policies. In cases where FSA cannot change an outcome due to policy or regulation, an explanation will be provided to the customer.
181	ED-2015-ICCD-0138-0028	Landing page ● How will the system prevent or weed out complaints that may be better addressed through other avenues, such as complaints about parking, cafeteria food, or heat in the dorms? A NASFAA member institution told us that one of the most frequent complaints on their school's annual student satisfaction survey is the speed at which the elevators operate. While these complaints may be indicative of issues at a school, they should rarely rise to the level of federal intervention.	User Experience	Complaint Types	The categorization feature of the complaint web form will only include dropdown values of complaint types that the Department will handle, and customers will be informed in language on the Contact Us form and in the knowledgebase regarding what types of complaints ECS is intended to collect.
182	ED-2015-ICCD-0138-0028	Landing page 3. Under "Report a Suspicious Activity": What is a "suspicious activity?" Fraud and abuse are clearer terms.	User Experience	Suspicious Activity	Suspicious activity is broader than fraud and abuse. Explanatory text will be provided to ensure that customers understand suspicious activity.
183	ED-2015-ICCD-0138-0028	Login Page: Complaint 1. Text under "Log In with FSA ID" -- two sentences run together, or maybe just a missingword.	User Experience	Plain Language	This has been fixed.
184	ED-2015-ICCD-0138-0028	Login Page: Complaint 2. In column on right (Common Questions), "trouble making loan payment" appears twice. Are these just placeholders or the actual questions selected to appear here?	User Experience	Plain Language	Those were just placeholders.
185	ED-2015-ICCD-0138-0028	Login Page: Complaint 3. Under "Continue Without FSA ID" -- The distinctions between using an FSA ID and continuing without one (but with identifying information) are not completely clear:	Security	Authentication	FSA will update the login page to make the distinction more clear.
186	ED-2015-ICCD-0138-0028	Login Page: Complaint ● In the fourth paragraph, it appears that with a Case ID number, the complainant can contact ED; how, if not online... by phone or letter?	Security	Authentication	Beginning on July 1, 2016, users with a Case ID number will be able to contact ED by phone for updates.
187	ED-2015-ICCD-0138-0028	Login Page: Complaint ● Why could the complainant not conduct activity online with a Case ID? Will ED let him or her know what the resolution is?	Security	Authentication	For security reasons, customers who are identified but not authenticated (i.e., those who do not choose to log in with their FSAID) will not be able to use the online case management tool. Beginning on July 1, 2016, these customers will be able to track, update, and manage their cases by calling a toll-free number.
188	ED-2015-ICCD-0138-0028	Login Page: Complaint 4. Under "Continue Anonymously" – in the fourth paragraph the only alternate option explained is login with FSA ID. This should also point out the option of continuing without an FSA ID.	Security	Authentication	FSA will update this text to make the distinction more clear.
189	ED-2015-ICCD-0138-0028	Login Page: Suspicious Activity 1. Use of "your case" sounds a little intimidating, like there are personal consequences to reporting. Something like "your report" or "your information" might be less so.	User Experience	Plain Language	Language has been modified to limit the use of the term "your case".
190	ED-2015-ICCD-0138-0028	Login Page: Suspicious Activity 2. The "Common Questions" section shows the same questions as for filing complaints. We assume that these are just placeholders and the sample questions presented here will be more related to suspicious activity.	User Experience	Plain Language	These are just placeholders.
191	ED-2015-ICCD-0138-0028	Login Page: Compliment 1. How will ED use compliments? Will they be included in the annual publication?	Reporting	Annual Report	The format of the Annual Report, as well as that of other planned or possible reports, has not yet been determined.
192	ED-2015-ICCD-0138-0028	2.1.1 Screenshot 1. Under "Total amount of tuition paid – Paid by any government benefit" – will there be hover text to elaborate? Someone (especially if filing on behalf of someone else) could think this includes VA benefits or Title IV aid, even though they are listed separately further down.	User Experience	Plain Language	Hover text will be available in all sections within the ECS webpages to assist customers in answering questions.
193	ED-2015-ICCD-0138-0028	2.1.4 Table of Relationship to Complainant Values 1. "Relative" should specify "other" (i.e., other than parent/guardian, child, sibling, significant other, or spouse, which are all separately listed).	User Experience	Plain Language	This table is a duplicate of that used by the Ombudsman team and this suggestion has been provided to them for review. If it is implemented by the Ombudsman team, it will be implemented by ECS.
194	ED-2015-ICCD-0138-0028	2.1.4 Table of Relationship to Complainant Values 2. "School representative" should specify other than financial aid office, which is separately listed.	User Experience	Plain Language	This table is a duplicate of that used by the Ombudsman team and this suggestion has been provided to them for review. If it is implemented by the Ombudsman team, it will be implemented by ECS.
195	ED-2015-ICCD-0138-0028	3.1.3 Table of Complaint Categories1. Mentions receipt of grants and loans but not work-study.	User Experience	Complaint Types	"Work Study" is a subcategory of the "School" category.
196	ED-2015-ICCD-0138-0028	3.1.4 Table of Complaint Subcategories 1. The meaning of many of these terms will not be known to students or their families; the text needs to be more explanatory. Hover text might help but can be burdensome when there are so many potentially unknown words? Examples:	User Experience	Complaint Types	FSA will take this comment into consideration when developing knowledgebase articles.
197	ED-2015-ICCD-0138-0028	3.1.4 Table of Complaint Subcategories ● What distinguishes "completing the FAFSA" from "application error"? To what does application error refer, applicant error or processor error?	User Experience	Complaint Types	FSA will take this comment into consideration when revising the language.
198	ED-2015-ICCD-0138-0028	3.1.4 Table of Complaint Subcategories ● Dependency status (which is listed twice) is a well-known term to aid professionals, but will students or families know exactly what it entails? Use language that explains the subcategory more. For example, is this intended to refer to issues with the assumed relationship of the applicant to his or her parents?	User Experience	Complaint Types	FSA will take this comment into consideration when revising the language.
199	ED-2015-ICCD-0138-0028	3.1.4 Table of Complaint Subcategories ● How will applicants know what "professional judgement" means? And how does that differ from "documenting extenuating circumstances?"	User Experience	Complaint Types	FSA will take this comment into consideration when revising the language.
200	ED-2015-ICCD-0138-0028	3.1.4 Table of Complaint Subcategories ● Student eligibility – this encompasses a long list of requirements, which most applicants will not know.	User Experience	Complaint Types	FSA will take this comment into consideration when revising the language.
201	ED-2015-ICCD-0138-0028	3.1.4 Table of Complaint Subcategories ● Administrative capabilities – This term also has defined parameters in regulation which would be obscure to students and their families.	User Experience	Complaint Types	FSA will take this comment into consideration when revising the language.
202	ED-2015-ICCD-0138-0029	In response to the Federal Register notice published on December 10, 2015, we write to comment on the state-of-the-art federal student aid complaint and feedback system envisioned in the March 2015 Presidential memorandum on a student aid bill of rights. The Institute for College Access & Success (TICAS) is an independent, nonprofit organization that works to make higher education more available and affordable for people of all backgrounds. Through nonpartisan research, analysis, and advocacy, we aim to improve the processes and public policies that can pave the way to successful outcomes for students and for society. We joined more than 50 organizations in submitting coalition comments supporting the creation of a comprehensive student and borrower complaint tracking system and urging the Department to make the system public, searchable, link it to the systems at other agencies, and make it easier to use. We expand on these recommendations below. The systematic tracking and reporting of student and borrower complaints is essential to providing quality customer service, ensuring college and loan servicer and collector accountability, and preventing waste, fraud, and abuse of taxpayer dollars. We support the Department's plan to create such a system. We applaud the Department for proposing a complaint tracking system that accepts complaints about many experiences in higher education, including loans, other aid, and institutions participating in the Title IV program. We are also glad that the Department plans to offer both English and Spanish in the system's online, phone, and chat functions. Lastly, we appreciate that the system will protect consumer privacy and ensure users who wish to remain anonymous can do so. As the Department has acknowledged, "Currently, there is no single contact or system for the receipt of these types of student [or] borrower complaints to Federal Student Aid. Instead separate business units in FSA handle these types of complaints on an ad-hoc basis and there is no cross checks for duplication of effort." To increase accountability and transparency, the President committed to providing all student loan borrowers with access to an efficient and responsive complaint and feedback system. The White House's explanation of the system's purpose is for "students and borrowers [to] be able to ensure that their complaints will be directed to the right party for timely resolution, and the Department of Education will be able to more quickly respond to issues and strengthen its efforts to protect the integrity of the student financial aid programs." To fulfill the Administration's goal, we believe the complaints system needs to be public and searchable, connected to the complaint systems used by other federal and state agencies, and clearer and easier to use. Only then will the system be well suited to resolve complaints in a timely fashion, provide useful consumer information, and identify trends for the government's enforcement efforts.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.

#	ID	Comment	Category	Subcategory	Response
203	ED-2015-ICCD-0138-0029	Publicly Track Complaints and Link ECS with Existing Complaints Systems: As explained in the coalition comments we joined, we believe the Department's complaint and feedback system must be public, searchable and connected to the systems at other agencies. As it stands, the Department's proposal appears to create an independent, private system. We urge the Department to implement a public, linked complaints system that: • Is searchable, including optional consumer complaint narratives.	Reporting	Searchable Database	Although FSA recognizes the value that can a searchable public database can provide to customers, this functionality is not planned for initial implementation. However, FSA is exploring ways to develop this capability for a future release, and does plan to provide reports to the public. For example, the Ombudsman will release an annual report beginning in October 2016, and is exploring the possibility of releasing standardized complaint data at more frequent intervals on the FSA Data Center, as well as periodic ad hoc reports on significant or timely issues.
204	ED-2015-ICCD-0138-0029	• Is connected to the Federal Trade Commission's ("FTC") Consumer Sentinel Network so federal and state agencies have immediate access to all complete complaints.	Collaboration	FTC	When applicable, complaints will be forwarded to entities such as the Federal Trade Commission's Consumer Sentinel.
205	ED-2015-ICCD-0138-0029	• Refers complaints directly to the relevant entity, whether a contractor, guaranty agency, state, accreditor, or other federal agency.	Processes	Routing	In the current iteration of ECS, complaints will be auto-routed only to federal loan servicers. Future functionality that allows for auto-routing to additional contractors is planned in the near future. When applicable, complaints can be referred to outside organizations for review and resolution.
206	ED-2015-ICCD-0138-0029	• Includes deadlines for action and resolution.	Processes	SLAs	FSA plans to develop formal obligations for response prior to the official launch on July 1st, 2016.
207	ED-2015-ICCD-0138-0029	• Asks the consumer if they are satisfied with the outcome and ensures agency staff reviews complaints where the consumer is not satisfied. These changes are essential to efficiently using taxpayer resources and maximizing accountability for students and borrowers on the part of lenders, servicers, institutions, and contractors.	Processes	Complaint Resolution	FSA will explore the possibility of developing functionality to track and report on customer satisfaction with resolutions in the near future.
208	ED-2015-ICCD-0138-0029	Increase Ease of Use for Students and Borrowers: As explained in the coalition comments we joined, we believe the Department's complaint and feedback system must easy to use and utilize language that is clear to students and borrowers. To improve usability and effectiveness of the system, we recommend the following: • Make it clear that the system accepts all types of complaints.	Communications	Plain Language	Language in external communications and on the ECS page will make it clear that the system accepts all feedback related to the Title IV aid experience.
209	ED-2015-ICCD-0138-0029	• Replace the "report suspicious activity" function with a section specifically for whistleblowers, and consolidate all other complaints under "submit a complaint."	User Experience	Suspicious Activity	The suspicious activity category is broader than 'whistleblower' reports.
210	ED-2015-ICCD-0138-0029	• Request the consumer's personal information after the complaint information.	User Experience	Submission Flow	Because some functionality, including the use of chat as a support channel, is only available to customers who log in with FSAID, customers are asked to select their log-on method and input data first in order to ensure that they can be provided with as much support as possible during the complaint submission process.
211	ED-2015-ICCD-0138-0029	• Make the text clearer and friendlier to consumers.	Communications	Plain Language	Many changes are being made to the proposed ECS language as a result of comments received via the public comment and usability testing processes.
212	ED-2015-ICCD-0138-0029	Recently we tested a portion of the complaints system for usability, organization, content, and style, and the comments below reflect our experience as well as a review of the ECS baseline text. We find some of the language, instructions, and structure of the system unclear and unsuitable for many consumers and urge the Department to make the following improvements: • Do not require users to categorize their complaints in order for them to be accepted into the system, tracked, and addressed. When testing the system we found that it forces users to self-categorize complaints in ways that could prevent them from moving through the system. For example, to file a complaint, the user would answer numerous questions about her application without being presented with the option to select "I am not sure" or "this does not apply to my situation." This would likely result in a high degree of user error and inconsistency in categorizing complaints. Instead, the system should route complaints to the proper entity regardless of how a consumer categorizes a complaint and give users the option to select "I am not sure" or "This does not apply to my situation" in all stages of the complaint categorization section.	User Experience	Submission Flow	Categorization is required in order to effectively route a complaint to the appropriate party for review, response, and resolution. By doing so, ECS ensures that the customer receives an appropriate resolution as quickly and efficiently as possible, maximizing the overall customer experience.
213	ED-2015-ICCD-0138-0029	• Allow anonymous complainants and complainants without FSA IDs to track complaints using a unique code or username. All complainants should be able to determine key information about filed complaints, including but not limited to: date filed, current status of the complaint, and more. If the complaint has been resolved, all users should be able to log in to see the resolution date, and to dispute the resolution. For example, the Consumer Financial Protection Bureau (CFPB) allows complainants to create their own usernames and passwords. Complainants then use their username and password to log in to review their complaints. It is reasonable to expect that anonymous complainants would want to follow up on the details of their complaints. It is also reasonable to expect that parents and relatives may file complaints on behalf of students and borrowers, in which case FSA IDs would not apply to these users.	Security	Authentication	For security reasons, customers who are identified but not authenticated (i.e., those who do not choose to log in with their FSAID) will not be able to use the online case management tool. Beginning on July 1, 2016, these customers will be able to track, update, and manage their cases by calling a toll-free number.
214	ED-2015-ICCD-0138-0029	• Give users the option to call a toll-free number and chat on-screen for assistance with complaints, and display this option prominently on the complaints portal. Many users may have little experience with navigating the portal and will need assistance by phone to file complaints. Some users may also feel more comfortable conducting business by phone. The Department should provide users with this option and display the toll-free number prominently on the portal at every stage of the complaint filing process. We thank the Department for exploring the option to provide users with an on-screen chat option. Complainants should also be able to call a toll-free number for assistance. Lastly, if complainants feel more comfortable using the phone, they should be able to check on the status of their complaints by providing their FSA IDs or unique codes by phone.	User Experience	Submission Flow	Beginning on July 1, 2016, authenticated users will be able to use chat functionality for assistance in completing the online form, and all users (regardless of authentication) will be able to call a toll-free number to be able to submit, update, or track the status of their submissions.
215	ED-2015-ICCD-0138-0029	• Accept and address complaints about debt relief scams and deceptive lead generation websites. The Department should develop a plan for dealing with these types of abuses, which have become more common.	User Experience	Complaint Types	This information could be provided to FSA via the 'suspicious activity' submission process.
216	ED-2015-ICCD-0138-0029	• Use "hoverable" explanations in cases where plain language is not straightforward enough for the general public to understand.	User Experience	Plain Language	Hover text will be available in all sections within the ECS webpages to assist customers in answering questions.
217	ED-2015-ICCD-0138-0029	• Ensure ECS works on numerous platforms, including mobile phones. Many complainants will only have internet access on their mobile phones. ECS should function fully on mobile platforms.	User Experience	Mobile	The complaint system will be optimized for mobile devices.
218	n/a	• Currently, the complaint system proposal solicits military affiliation. I would suggest soliciting information about other important statuses, such as disability and minority status.	User Experience	Submission Flow	Military information is required under Principles of Excellence processes. FSA will explore the possibility of soliciting information about other statuses for a future release.
219	n/a	• 2.1.6 specifies "$20,000 - $29,000". That should be "$20,000 - $29,999". And "Greater than $30,000" should be "$30,000 or more"	User Experience	Plain Language	The first suggestion has been implemented. The language related to "Greater than $30,000" is a duplicate of the value used by the Program Compliance team; the suggestion has been provided to them for review. If Program Compliance implements the change, it will also be implemented by ECS.
220	n/a	• 3.1.3 and 3.1.4 should probably be in either chronological order or alphabetical order	User Experience	Submission Flow	The majority of dropdown values will be listed alphabetically. Some dropdown values (e.g., issue type) will be listed in order of most probable to least probable, in order to improve the ease of use for customers.
221	n/a	• The complaint system does not seem to consider the possibility that a complaint is about an email message received by a student, such as spam, forged email, etc.	User Experience	Suspicious Activity	This information could be provided as a complaint related to 'action, outcome, or communication'. A forged email could be provided as a 'suspicious activity' submission.
222	n/a	• The complaint system does not seem to consider the possibility of complaints received in connection with the College Scholarship Fraud Prevention Act of 2000.	User Experience	Complaint Types	This information could be provided to FSA via the 'suspicious activity' submission process.
223	n/a	• The complaint system should probably include a cross-reference link to the similar system for private student loans, to make it easy for complainants to get to the appropriate system.	Collaboration	CFPB	Consumers will be directed to the Consumer Financial Protection Bureau in explanatory text on a revised Contact Us page on StudentAid.gov, as well as in Q+As in a dynamically updated knowledge base on the right hand side of the ECS, if they have a complaint related to private student loans, and to other relevant parties (e.g., their school or their servicer) as applicable.