Enterprise Risk Management Division
Compliance@aesSuccess.org

Kate Mullen
Acting Director, Information Collection Clearance Division
U.S. Department of Education
550 12th Street SW, PCP, Room 9086
Washington D.C. 20202-0023

Ms. Mullen,

On December 7, 2018, the U.S. Department of Education published a notice in the Federal Register (83 FR 63160) soliciting public comment regarding the Federal Student Aid (FSA) Feedback System [Docket No.: ED-2018-ICCD-0128].

Although the FDMS Portal has been intentionally engineered to be student/borrower friendly, we recommend the following enhancements from a servicers' perspective:

- ***Students/borrowers may not realize from whom they are receiving a response.***
  Although partners strive to emphasize the source of their communications, the portal through which these messages are delivered is closely associated with the Department; therefore, recipients may presume that all responses originate from the Department.

  FDMS is the single point of contact for federal student aid borrowers to submit feedback concerning their student aid experience. Cases are created and routed to the appropriate entity within FSA or its associate partners to respond. Partner users submit their responses through FDMS so that those responses are accessible by the Department. Those responses can be placed on official partner user letterhead; they can be mailed or emailed but a copy of the response must be uploaded to FDMS for tracking and auditing purposes.

- ***When not actively assigned for processing, partners addressing a similar case have a limited ability to view the other organization's activities.***
  For example, if a servicer submits a communication to the borrower via the Portal, it closes the case relative to that servicer. Should the borrower respond to that communication, the servicer cannot see that communication; therefore, it cannot support FSA in responding to it.

  The limitation is purposeful in compliance with current FSA practice of restricting ED-Servicer Partners' access to only their assigned client portfolios. With the advent of the Next Generation Financial Services support model this restriction may change.

- ***Once a case is reassigned, a servicer can no longer view pre-closure activity.***
  While servicers may individually archive images of FDMS transactions, there would be a benefit to ready access to pre-closure FDMS activity during subsequent interactions with students/borrowers.

  Once a case is reassigned out of the Servicer's queue (*for example, if they need to escalate the case to FSA for resolution*), the Servicer can no longer view the case. The visibility that is enforced for Partner Portal users limits them to only be able to view cases that are either assigned to them, assigned to someone else in their organization, or assigned to their organization's queue (e.g., Mary at Nelnet can see cases assigned to her, assigned to her co-worker Jane who also works at Nelnet, and cases assigned to the Nelnet queue).

- ***Partners lack the ability to assign cases to other entities.***
  Partners can only assign cases to individuals within their own queue/business unit. It would be beneficial to have the ability to assign cases to other entities (FSA specifically) and to retain the ability to follow that case within the FDMS Portal.

  The limitation is purposeful in compliance with current FSA practice of restricting ED-Servicer Partners' access to only their assigned client portfolios. With the advent of the Next Generation Financial Services support model this restriction may change.

- ***The ability to assign multiple case owners to "Level 2 FDMS Complaints" would aid all parties actively working a case.***

  This is a purposeful system limitation. The Feedback system was intentionally designed to permit only one case owner at a time for positive, singular ownership control and accountability. The tasks workflow functionality enables multiple persons to work on a case collaboratively.

- ***'Recommended Activity Tasks' cannot be assigned to other organizations.***
  Broadening this functionality may improve communication among the partners.

  The limitation is purposeful in compliance with current FSA practice of restricting ED-Servicer Partners' access to only their assigned client portfolios. With the advent of the Next Generation Financial Services support model this restriction may change.

- ***Additional filters and reporting options are recommended.***
  This would allow partners to select the data that is pertinent to their needs.

  Through the change management process for the Feedback application, recommendations can be made on what additional filters and/or reporting options, if implemented, would permit greater flexibility in data selection to attain increased pertinent reporting outcomes.

We appreciate the opportunity to comment.

Sincerely,

David Racculia
Senior Compliance Coordinator