**Comment #1**

I am writing to recommend you continue to allow SAIG Enrollments to happen via the FSAWebEnroll site for the foreseeable future. It is irresponsible to move the service to the FSA Partner Connect website while the glitches from the previous Partner Connect update (for E-Apps) are still being worked out. If your programmers are bored, they can help work out the glitches with NSLDS and the FAFSA systems, rather than subjected schools and other partners to more hasty updates that wreak havoc on the FSA community.

**Response #1**

This comment is not relevant to this information collection.

**Comment #2**

Department’s reply to Question 3 and 12:

Department’s provision of an additional, paper format for SAIG enrollment is wasteful and conflicts with Federal fiscal interests.

(1) Student Aid Internet Gateway (SAIG) is used for electronically transmitting and receiving data and facilitates FSA systems and institutions to electronically (by mandate) transact business. If the “entities hav[e] difficulties accessing the Internet,” then they should not be authorized to be a participant in the “[mandatory to be electronic] transmitting and receiving [of mass] data.”

(2) And, if the intent of the paper version of the SAIG enrollment form is to safeguard personal information collected from some administrators, then Department should not exercise stricter protections of administrators’ info as compared to protections of the information of students’ and aid applicants’ the FSA data system is to serve.

Department’s reply to question 4 that “The SAIG enrollment form is the only means that … entities can ... enroll for the ... data exchange services“ is an untruth because there are undefined and unlimited future “’[o]thers’ approved by the U.S. Department of Education” (see Department’s answer to question 1), without justification, rendering this proposed rule a facade and a waste of federal funding.

Department’s reply to question 4 is incomplete because it does not answer the second part of the question: why the currently existing way for entities to exchange and update student financial aid data” cannot be used.

Department’s reply to Question 5 is flawed. Department cannot assert that, “[n]o small businesses are affected by this information collection,” because the “third-party servicers” and “contracted processors” will be users of the FSA data system (see Department’s answer to question 1). Department does not limit the number of quoted entities used by each DPA (primary, secondary) or similar. Therefore, Department has no way of knowing whether these DPA organizations, servicers, and processors are small businesses or not. Otherwise, the form is missing the corresponding scrutiny.

Department’s reply to question 6 is inaccurate. “If the collection is not conducted“, the access and handling of Federal Student Aid (FSA) data would continue being done in the same way as it has been thus far.

**Response #2**

1. Paper version of the SAIG Enrollment form is required when an organization is requesting the change of the Primary Destination Point Administrator due to previous PDPA not been available.
2. The Department does not allow any additional enrollment methods other than enrolling via SAIG Enrollment site or via paper version of the SAIG Enrollment form.

**Comment #3:**

SAIG data systems are expected to contain millions of individuals’ information. It is continuously updating and the proposal offers no way to disenroll, opt-out, or request destruction of the information – it is a “forever” record.

Department’s proposal allows servicers and private contractors unlimited access to this information, irregardless of the servicer’s purpose, so long as they agree to adhere to requirements and responsibilities.

Instead of guarding the individuals’ private information, Department, through its agreements, threatens penalties to mis-users, but offers no way to prove the misuse. (This is like removing front doors from dwellings and instead putting up signs warning against theft and misuse.)

Currently, Department relies on the mis-users to voluntarily report their committed violations.

Each punishing measure for misuse of information from SAIG would be applied after the fact of violation.Punishment of a misuser, even if enacted, would not cause the misdeed to be undone or the released information be retrieved from circulation.

Department has a poor reputation when it comes to applying repercussions, as years of published reports on issues impacting [FAFSA-paid] education experience did not result in Department’s corresponding actions of investigating, fining, or punishing.

The proposal should include a mechanism to actively identify instances of:

“improper use”

prohibited disclosures

employees who “willfully disclose the material in any manner to any person or agency not entitled to receive it”

prosecutable “violation of [cited] rules and responsibilities”

“fraud, commercial advantage, or private financial gain” through use of information from SAIG

If Department is refusing to guard the information, and there is no effort to custom tag the information to identify the user (and where this tag cannot be removed, so information’s travel can be traced), then the Department must provide a study of all possible damages that the information owner may incur throughout his or her lifetime and calculate the cumulative burden of the SAIG’s information owners. **The amount of that burden has to be central to how this proposal gets finalized.** (Public needs to participate indiscussion of instances of extended disadvantages and their perceived value.)

The proposal should include a mechanism for the owner of the SAIG-kept information to trace entities accessing his or her digital file and what was done as a result of the access.

Without this, warnings of fines and other punishments are ensured from being exercised.

This Rule should not include granting the Secretary or other Department employee a power to unilaterally and outside the proper scrutiny approve an entity to receive any information from SAIG, as it creates VIP parallel users and defeats transparency and accountability.

The information contained in this docket, ED–2024–SCC–0100, is a part of many other Department proposals on regulations.gov.

**Response #3:**

1. The Department provides an individual access to their PII consistent with the Privacy Act which, among other provisions, permits an individual to inspect and amend their records. More information regarding Privacy Act requests may be found here: <https://www.ed.gov/about/ed-overview/required-notices/foia/privacy-act-request-instructions--making-a-request--freedom-of-information-act-foia>.
2. The Department will consider future enhancements to the information collection request based on public comment toincrease the posture of the information security of this system. The recommendations from public comment are being referred to the program office for further consideration and future process and system enhancements.