

1845-NEW Federal Student Aid (FSA) Partner Connect System and User Access Management
60D comment response table

Comment	FSA Response
<p>“After the disastrous rollout of Partner Connect 2.0 I hope the Department has learned some lessons. Top in my mind is that it is essential the the Dep of ED engage ALL their stakeholders (institutions, TPSs, Guarantee Agencies, Loan servicers, etc.) in testing PRIOR to the rollout of these updates. It is completely unfair to stakeholders to have them do testing on a live systems (as happened with moving the E-App into Partner Connect) when they are trying to engage in essential functions.”</p>	<p>Thank you for the comment. No changes have been made to this information collection request related to this comment.</p>
<p>“Allowing for more support to students who utilize federal financial aid, including subsidized and unsubsidized loans, is never a bad idea. The more support that a student has when it comes to repaying of loans as well as how to best stay on time with payments as well as catch up when you fall behind, the more chances they have to keep their own finances afloat as a working adult. I can personally appreciate all and any avenues of support for causes of this nature.”</p>	<p>Thank you for the comment. No changes have been made to this information collection request related to this comment.</p>
<p>1. Access authorization to FSA systems for the listed categories of entities should come with a clause of relevance: e.g. if there is no guaranty issues for a specific applicant or recipient of aid, then guaranty services should not access that individual’s information. An applicant’s submitted application should be the indicator of relevance for the approached service to access that applicant’s record. Likewise, the state is not a party to a student’s applying for federal aid, so it should not go into a student’s information. The Department may send the state a bulk number of federal aid recipients residing in that state. If the fed aid recipient applies for the state ed aid, then the state can collect</p>	<p>1. Thank you for the commnet. Upon logging in to FSA Partner Connect, users must read and acknowledge the <i>Privacy Act</i> and <i>Rules of Behavior</i>. The <i>Privacy Act</i> includes, “If you use an FSA system, you are explicitly consenting to be bound by the [Privacy] Act’s requirements and acknowledge the possible criminal and civil penalties for violation of the [Privacy] Act... Any officer or employee of an agency, who by virtue of his employment or official position, has possession of, or access to, agency records which contain individually identifiable information the disclosure of which is prohibited by this section or by rules or regulations established</p>

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<p>that applicant's personal details for eligibility processing. The FSA systems should be used on a need-to-know basis.</p> <p>2. Privacy Impact Assessments for SAIG and PEPS were completed on March 2020 and November 2022 – both reflecting circumstances of then-ongoing COVID-19 pandemic time, and are no longer representative. Both assessments should be ran now to reflect the accuracy of current, non-extreme circumstances.</p> <p>3. In the docket's Q+A Supporting Statement, the procedure of collecting entities' users' names, DOB, part of SSN, and contract-promises of propriety is insufficient to protect private information of applicants, students, and families. (The text's, "to protect privacy information contained in the FSA systems," is misleading.) Consequential punitive measures need to be established for misuse and improper handling of personal information from the FSA systems. A right to private action should be expressly stated. (A great deal of financial, employment, rental, and other prerequisites for social mobility depend on the security of entries, and their accuracy, in this database.)</p> <p>4. The applicants, students, or their parents – those whose information gets submitted into FSA databases – should have a right to, upon request, receive a disclosure of detailed users' accesses to their information along with the purpose for accessing the information. There should be an option of obtaining a printout of all information that is assigned to the individual's name or identifier (which may include users' notes and results of processing). This should be provided by a single source, the US Department of Education, through a request form. Partner Connect</p>	<p>there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than \$5,000." The <i>Rules of Behavior</i> include, "Your User ID and password are for official Department of Education business only. You are individually responsible for ensuring that data/information obtained from FSA systems is not used improperly... I further understand that violation of these rules and responsibilities may be prosecutable under local, State, and/or Federal law." No changes have been made to this information collection request related to this comment.</p> <p>2. Thank you for the comment and request. Existing Privacy Impact Assessments (PIAs) are updated when a system change creates new privacy risks or to reflect changed information collection authorities, business processes or other factors affecting the collection and handling of information in identifiable form. As stated in Item 10 below, PIAs for SAIG and PEPS were completed on March 30, 2020 and November 3, 2022, respectively. The most recent PIA for FSA Partner Connect was published on December 14, 2020. An updated PIA for FSA Partner Connect is in progress and will be published on ed.gov once approved/finalized. We have added this to Item 10 below.</p> <p>3. Thank you for the comment. No changes have been made to this information collection request related to this comment.</p> <p>4. Thank you for the comment. The System of Records Notices (SORNs)</p>
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<p>System and their net of access-authorized entities, many of whom are private businesses, are free to create own rules and obstacles to avoid disclosures or upset their completeness. Also, a complaint procedure needs to be established for the grievances of individuals-owners of the information in the database(s). Q+A Supporting Statement's item 7 needs to be updated to require all users to retain all records created by them related to individuals' info for the same amount of time as the IRS recommends people keep their financial records. This is a way for individuals to evidence fumbles caused by users of FSA systems to a third party.</p> <p>5. Because the Department chose to have FSA run through authorizing thousands of users to access and use applicants', students', and families' information, it essentially added conditions to receive federal program benefits – this is outrageously exploitive. Therefore, the Department needs to expend for information protection measures.</p> <p>6. In the interest of transparency, Department should not reserve the right to designate other entities, including “private”, for “re-disclos[ure] [any of student information, including] student’s Free Application for Federal Student Aid (FAFSA) filing status” through undisclosed additional “written agreement[s]”. Rule making procedure requires public review.</p> <p>7. There is no known way for an entity to prevent breaches of its database.</p> <p>8. Institutions should not be directed to “use software developed by the institution, or its vendor” (as it expands the number and breach risk of databases with personal info of aid applicants), instead of the Department’s provided unified, defined in use and purpose one.</p>	<p>listed in Item 10 below include instructions for determining whether a record exists regarding you in the system (“Notification Procedures”) and contesting the content of a record in the system pertaining to you (“Contesting Record Procedures”). Additional information on system record retention can be found in the SORNs listed in Item 10 below (“Policies and Practices for Retention and Disposal of Records”). No changes have been made to this information collection request related to this comment.</p> <p>5. Thank you for the comment. Information on the Department’s information protection measures can be found in the System of Records Notices (SORNs) and Privacy Impact Assessments (PIAs) listed in Item 10 below. For institutions/organizations, Authorizing Officials and/or their Designees must electronically sign the <i>Authorizing Official Approval Form</i>, which includes information protection measures that the institution/organization must adhere to. Users that gain access to FSA Partner Connect must electronically sign the <i>Responsibilities of FSA Partner Connect Users</i>, which includes information protection measures that the individual must adhere to. No changes have been made to this information collection request related to this comment.</p> <p>6. Thank you for the comment. No changes have been made to this information collection request related to this comment.</p> <p>7. Thank you for the comment. The forms within this package (<i>Authorizing Official Approval Form</i>, <i>Designation of Authorizing Official</i></p>
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<p>9. If the cost of providing such software is prohibitive “to protect Federal fiscal interests”, then the costly transitioning to a new systems should not be undertaken. The obviously efficient and economic way to provide federal education aid is through a kiosk-style algorithm, processing application form fields against eligibility criteria and sending the resulting amount of aid to the school of attendance. Same with loans.</p> <p>10. Instead of having the reliable student-oriented “Student Aid internet Gateway (SAIG)” adjusted, the Department chose to introduce a new, contractor-oriented “Partner Connect” of many, including ambiguous “institutional third-party servicers” that are essentially permitted to self-regulate.</p>	<p><i>Designee Form, and Responsibilities of FSA Partner Connect Users</i>) provide guidance to institutions/organizations on how to report an unauthorized disclosure or breach of student applicant information or other sensitive information (such as personally identifiable information) to the Department. No changes have been made to this information collection request related to this comment.</p> <p>8. Thank you for the comment. No changes have been made to this information collection request related to this comment.</p> <p>9. Thank you for the comment. No changes have been made to this information collection request related to this comment.</p> <p>10. Thank you for the comment. Institutional Third-Party Servicers refer to the entities or individuals that enter into a contract with an institution and administer any aspect of an institution's participation in the Title IV programs on behalf of an eligible institution. No changes have been made to this information request related to this comment.</p>
<p>The old system of processing FERPA applications, SAIG, has worked for a long time and should be continued as an option to the applicant of federal aid.</p> <p>Last year, the trial version of FSA caused problems nationwide. Malfunctions in unrolling any new product on a mass scale are foreseeable. There was no safety net provided by ED to offset this, and millions of phone calls for help from college-applying families were ignored. [https://www.gao.gov/products/gao-24-107407] The Congress rule to simplify FAFSA form was to increase access to</p>	<p>Thank you for the comment. SAIG Mailboxes will remain as the access point for electronically transmitting and receiving data. FSA Partner Connect will be replacing the functions of managing enrollment to access SAIG Mailboxes (fsaweb.enroll.ed.gov). No changes have been made to this information collection request related to this comment.</p>

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<p>education. Department's choices in implementing the rule achieved the opposite. Enrollment has decreased by 40% in Arizona alone [https://kjzz.org/news/2024-06-11/fafsa-problems-have-been-felt-more-in-arizona-than-in-other-states] and lower-income students and minorities were especially harmed.</p> <p>(When enrollment of poor enrollees decrease, it results in positive statistics for the Department: poor enrollees represent a lower rate of staying and graduating college. So without them, the rate increases, suggesting improvement.)</p> <p>Pacifying user-applicants with the familiar interface of SAIG Mailboxes (from the system that was reliable) as the access point, while having the rest of processing and reporting done through Partner Connect (the system that caused disasters) is misleading and deceiving because it puts up a facade of reliability. The department needs to illustrate that the cost-benefit analysis of continuing with a proven-to-be-bad Partner Connect system is more favorable to students' completion of post-secondary education than reverting to the working SAIG. Additionally, the Department does not put forth any founded assurances that, going forward, Partner Connect will function as intended.</p> <p>For those reasons, the Department needs to make available a safety net, an alternative way to apply for federal education aid, to ensure that it gets processed reliably. The dependable SAIG system could be such alternative. This would fulfill the Department's duty that, "agency shall identify ... available alternatives to direct regulation, ... providing information upon which choices can be made by the public".</p> <p>It is important that the burden of stress and expense to applicants' families, time spent on ED's non-working system, and the the</p>	
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long-term impact on the applicant's ability to make a living be calculated, as it was a burden imposed upon society by ED and its bad choices in implementing the Congress's directive, and in the absence of any failsafe - just as with this proposal.	
N/A (Internal Review)	<p><i>In Appendix B. Responsibilities of FSA Partner Connect Users:</i></p> <ul style="list-style-type: none">• Page 1 – Corrected the full spelling of DHS-SAVE acronym (U.S. Department of Homeland Security's Systematic Alien Verification Entitlements (SAVE) system)• Page 2 – Removed the "NN" typo at the end of the fourth bullet under Additional Requirements of the Primary Administrator