

Comments and Responses

OMB 60 Day Comment Period

Application for Approval to Participate in Federal Student Aid Programs (E-App)

Docket ID ED-2025-SCC-0514

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ED-2025-SCC-0514-0004 ECPI University

Response

We appreciate this comment and the opportunity it provides to clarify the relationship between school closures and borrower defense provisions.

Per 34 CFR Section 682.402(d)(1)(ii)(C), a “closed school” is defined as “a school's main campus or any location or branch of the main campus, regardless of whether the school or its location or branch is considered title IV eligible.” Given this definition, the 22,000+ institutions, locations, and branch campuses listed in the FSA Weekly Closed School Search File are all “closed schools.”

Simply meeting the above definition, however, does not automatically qualify a borrower who has attended a closed school for loan discharge. Per 34 CFR Section 682.402(d)(3), the borrower only qualifies if:

- (ii) the school closed while the student was enrolled
- (iii) the borrower did not complete the program at another branch or location of the school or through a teach-out agreement at another school

Given the considerations above, we do not agree with the commenter that “simply discontinuing use of a facility could establish borrower eligibility for discharge,” as there are further criteria to be met for loan discharge beyond merely attending an institution, location, or branch campus designated as a “closed school.”

We do however recognize that the descriptive text on the FSA Partner Connect webpage that hosts the Weekly Closed School Search File is phrased such that it may imply a direct connection between closed schools and qualification for loan discharge. A suggestion to revise that text will be forwarded to the relevant staff.

ED-2025-SCC-0514-0005 Peter Goss

Response

We appreciate this comment, which voices broad approval of the proposed revisions to the E-App. The comment includes several questions and concerns, which are addressed here individually.

1. **Commenter approves of new automatic application approvals.** No response needed.
2. **Commenter calls for a more complex approach to determining what qualifies as an Additional Location.** The definition of “Additional Location” is specified in 34 C.F.R §600.20/.21, and we must strictly adhere to this definition while determining what counts as an Additional Location or Additional Location closure.
3. **Commenter calls for switching to reporting “bands” of credit hours (e.g., 30-45) rather than precise figures.** We appreciate this suggestion and agree that implementing it in the future could help reduce the number of applications that must be submitted. However, acting on this idea would require substantial procedural research that extends beyond the scope of the current OMB clearance process. The idea has been documented for consideration in future releases of Partner Connect.
 - 3a) **Commenter dislikes the Additional Locations section of Partner Connect site.** While we have endeavored to make the Partner Connect site as user-friendly as possible, we appreciate specific feedback about the navigability of the site. We encourage the commenter to articulate the ways in which the previous version of the site may have been easier to navigate.
4. **Commenter questions collection and use of information on program modalities.** Information on teaching modality (e.g., distance learning) needs to be collected to ensure that programs comply with statutory requirements. We cannot comment on rumors or speculation around other rationale for this data collection.
5. **Commenter questions the need for collecting emergency contact information.** Starting with this revision of the E-App, personal details are now

only collected from the President/Chancellor and emergency contacts at domestic schools. We cannot comment on rumors or speculation around other rationale for this data collection.

6. **Commenter points out access issues for the E-App and suggests that the site is overly secure.** Access issues for the E-App are continually being resolved as school staff become accustomed to the new system and FSA staff create more efficient internal processes for restoring access. The level of security for the E-App is designed to match the sensitivity of the data collected.

ED-2025-SCC-0514-0006 Central New Mexico Community College

Response

We appreciate this comment regarding limitations of the Integrated Postsecondary Education Data System (IPEDS) survey as it pertains to open-enrollment institutions. The OMB clearance presented here relates only to the Application to Participate in the Federal Student Financial Aid Programs (E-App), which is distinct from IPEDS. This comment will be shared with the appropriate staff.

ED-2025-SCC-0514-0007 Virginia Welborn

Response

This comment describes E-App access issues encountered by the submitter. FSA staff have been trained to resolve the issues described and have returned from furlough following the Federal government's reopening on November 13, 2025. We encourage the submitter to contact the FSA Partner and School Relations Center.

ED-2025-SCC-0514-0008 Central Christian College of the Bible

Response

This comment contains a question about timelines for processing applications in light of the 2025 government shutdown. FSA staff have returned from furlough status with the Nov. 13, 2025 reopening of the Federal government and continue to process applications as usual.

ED-2025-SCC-0514-0009 Capella University and Strayer University

Response

We appreciate this comment, which voices support for the proposed revisions to the E-App and suggests some avenues for further improvement. Those suggestions for improvement are addressed here individually.

1. **“To ensure clarity and consistency, we recommend that the Department define which types of updates qualify for automatic acceptance and provide institutions with confirmation of acceptance once submitted.”** The types of application that will be automatically accepted will be announced with the release of this update to the E-App. Confirmation of acceptance will be produced by Partner Connect, as it is for current applications.
2. **“...we recommend that the Department provide standardized procedures and guidance for conducting and documenting debarment checks. Clear expectations and templates will help ensure consistency across institutions and reduce the risk of inadvertent errors.”** We recommend using <https://sam.gov/> during research on possible exclusions of individuals and entities. Differences between institutional procedures and record keeping mean that we cannot provide more specific guidance, other than for the individual submitting the E-App to certify that decisions are made “to the best of my knowledge and belief, and after conducting a diligent examination of all available information”.
3. **“To support institutions in navigating this new [Federal School Code] logic, we recommend that the Department include visual flowcharts or decision trees in its guidance materials. These tools will help institutions determine the correct response based on their FSC status and reduce the risk of errors.”** While the additional questions included with this revision of the E-App are intended to clarify options around Federal School Codes, we agree that unfamiliar questions may initially cause some confusion. A new *User Reference Guide to the E-App* is currently in development, and this topic will be added.
4. **“We recommend that the Department clarify the definitions used in these questions [about state licensure and programmatic accreditation], provide illustrative examples, and consider referencing applicable sections of 34**

CFR Parts 600 and 668 to support consistent interpretation. This will help institutions understand when the questions apply and how to respond accurately, thereby improving the quality of submitted data.” Explanatory information for these new questions will also be added to the forthcoming *User Reference Guide to the E-App*. Since these questions relate to state-level requirements, however, it will remain the responsibility of institutions to be familiar with the requirements of the states in which they are located.

5. **“We recommend that the Department allow institutions to designate alternate authorized signatories [other than previously entered CEOs or Presidents/Chancellors] with appropriate documentation. This flexibility will help ensure timely submissions and maintain compliance during periods of organizational change.”** Section Q of the E-App already includes the option for institutions to designate alternate signature authorities, as long as written delegation of authority is provided.
6. **“We recommend that the Department retain auto-population where feasible, especially for recurring contacts, and allow manual overrides when necessary. This approach balances accuracy with efficiency and supports a smoother user experience.”** Auto-population remains a feature throughout the E-App to minimize data re-entry. This revision of the E-App only removes auto-population in instances where information should not logically be carried from one application to the next.
7. **“To ensure a smooth transition, we recommend that the Department: Publish detailed guidance documents and FAQs in advance of implementation; Offer webinars or training sessions for financial aid and compliance staff; Provide sandbox access to the updated eApp interface for testing and feedback.”** We plan to provide training material with the release of this revision. Given the minor nature of the changes described in this OMB application, we do not plan to provide a pre-release version for testing.
8. **Commenter raises several concerns around changes in ownership:**
 - a. **Distinguishing CIOs Requiring Approval versus Notice.** Current procedures for handling Change of Ownership requirements were developed in consultation with the Office of the General Counsel (OGC).
 - b. **Structured Cure Pathway for Deficient Filings.** We appreciate this improvement idea and will take it into consideration. Because the implementation of this idea would have procedural implications and would require significant collaboration with our internal policy team, however, we

cannot implement this change within the timeline for the current E-App revisions.

- c. Acceptance of Screenshots for Accreditation and State Authorization.** Due to security concerns, we prefer to maintain the current requirements for the submission of accreditation and authorization documents.
- d. Alignment of Financial Documentation Requirements.** This comment suggests a change to the instructional text (“help text”) on the E-App to clarify which recent audits need to be submitted. While we agree clarification will be helpful, we feel that the forthcoming *User Reference Guide to the E-App* is a more suitable place for providing these instructions.
- e. Instructional Prompts for Transaction Timing.** While we endeavor to process all applications in a timely manner, inconsistency in the complexity of applications and the pace at which applications are received means that a reliable timeline for processing cannot be provided.
- f. Transparency in Processing Expectations.** See answer e above.
- g. Enhanced Guidance and Decision Support Tools.** For the first time, we will release a *User Reference Guide to the E-App* alongside the forthcoming update. This User Reference will contain guidance on common issues and questions.

ED-2025-SCC-0514-0010 American Association of Community Colleges

Response

We appreciate this comment, which expresses support for the proposed revisions to the E-App and suggests two avenues for further improvement. These suggestions are addressed individually below.

- 1. Commenter questions the new process for selecting which Title IV programs to participate in.** As the commenter notes, the proposed revisions to the E-App modify the initial eligibility application process for Title IV programs. Instead of selecting specific programs, institutions now simply indicate whether they wish to participate in Title IV and are subsequently notified of the programs for which they are deemed eligible. Importantly, eligibility does not obligate participation. Once found eligible, institutions can log into the Student Aid Internet Gateway (SAIG) to select the programs they wish to participate in.
- 2. Commenter suggests allowing updates and corrections while an application is under review.** It is unfortunately impossible to allow corrections while an application is under review, as the substance of an application must remain unchanged while analysts review it.

ED-2025-SCC-0514-0011 DJA

Response

We appreciate this comment, which expresses support for the proposed addition of automatic approvals for certain types of application updates.

ED-2025-SCC-0514-0012 Middle States

Response

We appreciate this comment, which expresses support for the overarching goal of improving clarity and efficiency in the Title IV application process. We welcome any specific feedback or suggestions for improvement in the future.

ED-2025-SCC-0514-0013 New America

Response

We appreciate this comment, which calls for stronger oversight of institutional policies and procedures. The commenter makes four specific recommendations, which are addressed individually below.

1. **Require the institution to upload policies and procedures demonstrating compliance with applicable Title IV regulations.** At present, we have concluded that the efficiency gained in self-certification of policies and procedures justifies the move away from uploading and review.
2. **Require the institution to submit policies on ensuring the institution does not employ or contract with individuals or entities outlined in 668.14(b)(18) and 668.16(k).** We do not wish to prescribe specific procedures for institutions to demonstrate that they comply with 34 CFR § 668.14(b)(18), as this process will likely differ between institutions. (See answer below regarding 668.16(k))
3. **The Department should provide language in the self-certification requirement referencing all of the individuals and entities covered by 668.14(b)(18)(i) and (ii) and 668.16(k).** While the self-certification language addresses the requirements in §668.14(b)(18)(i) and (ii), it does not fully cover the debarment-related provisions in §668.16(k). Specifically, §668.16(k) requires that the institution and any principal, affiliate, or individual with substantial control not be debarred, suspended, or engaged in conduct that could lead to debarment under federal regulations. Because of this broader scope, some debarment checks will still be completed by FSA to ensure compliance with §668.16(k).
4. **The Department should provide regular updated information on suspensions, debarments, and institutions with unpaid liabilities.** We suggest that institutions use SAM.gov as their primary resource for information on suspensions and debarments.

ED-2025-SCC-0514-0014 NASFAA

Response

We appreciate this comment, which expresses approval of many of the proposed changes to the E-App. The comment also includes several suggestions for improvement and clarification, each of which is addressed below.

- 1. ED proposed a new method for selecting Title IV programs during the initial application process.** As the commenter notes, the proposed revisions to the E-App modify the initial eligibility application process for Title IV programs. Instead of selecting specific programs, institutions now simply indicate whether they wish to participate in Title IV and are subsequently notified of the programs for which they are deemed eligible. Importantly, eligibility does not obligate participation. Once found eligible, institutions can log into the Student Aid Internet Gateway (SAIG) to select the programs they wish to participate in.
- 2. Commenter seeks clarification on the requirement to add an explanation to questions in Section L.** The commenter requests clarification on whether an explanation is required when a question is answered “no” in Section L. An answer is always required for every question in this section that is answered “no.”
- 3. Commenter recommends providing a mechanism for schools to submit changes or updates as needed, even while an application is under review.** Unfortunately, it is not possible to allow corrections while an application is under review, as the substance of an application must remain the same while analysts review it.
- 4. Commenter recommends that the Department develop a plan to address the backlog of applications currently awaiting review and commit to processing applications within a reasonable and predictable timeframe going forward.** We are working toward reducing the inventory of applications that has accrued within the past year. In the meantime, we encourage institutions to continue to reach out via CaseTeams@ed.gov to resolve issues.