

**Author Full Name :** Aurie Clifford

**Received Date :** 01/16/2026 10:56 AM

**Comments Received :**

(1) Is this collection necessary to the proper functions of the Department?

Yes. An intermediary mechanism is necessary between servicers and lenders, default management, Total and Permanent Disability (TPD), schools, accreditation and program oversight, and financial aid eligibility. The Department oversees all of these functions, and there must be a way for students to elevate concerns beyond a single area of responsibility. Students are directly impacted by Departmental processes, decision-making, errors, and oversights, and the Department should hear directly from those affected to effectively oversee its programs. The Department expects schools and providers to respond to student inquiries and complaints and should hold itself to the same standard.

(2) Will this information be processed and used in a timely manner?

It can be, if technology is leveraged appropriately. While it would be impractical to manually staff millions of inquiries, an electronic intake form that collects standardized data points would enable automation, AI, or algorithms to conduct preliminary research across federal systems such as FAFSA, StudentAid.gov, FPS, NSLDS, and COD. This approach could also auto-generate targeted information requests to servicers, lenders, and schools, ensuring the Department has complete information when responding and enabling more timely resolution.

(3) Is the estimate of burden accurate?

The burden on respondents can be reasonable if the collection is narrowly tailored, standardized, and integrated with existing federal systems. Without automation, the burden may be underestimated; however, with thoughtful system design, both respondent burden and Departmental workload can be minimized.

(4) How might the Department enhance the quality, utility, and clarity of the information to be collected?

The Department should focus on collecting structured data elements aligned with existing federal records and processes. In addition, the Department should address long-standing systemic data errors, particularly within NSLDS, that are already generating confusion and complaints. Examples include incorrect loan limit calculations, improperly processed consolidations, erroneously generated C-flags, and inaccurate messaging to students and schools. These data points are relied upon by schools and providers to provide students with an accurate understanding of eligibility, and unresolved system issues degrade the quality and utility of the collected information.

(5) How might the Department minimize the burden of this collection on respondents?

Burden can be minimized through a single, user-friendly electronic form that uses logic-based routing, limits unnecessary questions, and integrates directly with federal aid systems. Automation and AI should be used for initial analysis and data gathering. Additionally, addressing existing systemic data errors would significantly reduce repetitive inquiries and complaints. The constant reprocessing of ISIRs that toggle students between eligible and ineligible status has strained the entire financial aid ecosystem. Ensuring federal systems function correctly and contain accurate data is critical to improving the student experience and increasing efficiency and effectiveness across the system.