

February 5, 2019

Director of the Information Collection Clearance Division,
U.S. Department of Education,
550 12th Street SW, PCP, Room 9086,
Washington, DC 20202-0023.

Comment submitted electronically at www.regulations.gov.

Re: Federal Student Aid Feedback System, Docket Number ED-2018-ICCD-0128

Dear Acting Director Mullan:

Thank you for the opportunity to comment on the Federal Student Aid (FSA) Feedback System. As advocates for students, consumers, veterans, faculty and staff, civil rights and college access, the undersigned organizations believe that the FSA Feedback System serves an important and necessary function in the administration of the Department of Education's programs. Accordingly, we have strong concerns about changes the Department has implemented, changes that make it much more difficult to report wrongdoing at colleges and universities – changes that put students and taxpayers at risk.

The FSA Feedback system was created in 2016 to give students a simple and straightforward way to provide feedback and file complaints about student loan collections, colleges and universities. The system assures students that their complaints will be quickly directed to the right officials and allows the Department to identify systematic issues and strengthen the integrity of the financial aid programs. We believe the systematic tracking and reporting of student and borrower complaints is essential to providing quality customer service, ensuring college and loan servicer and collector accountability, and preventing waste, fraud, and abuse of taxpayer dollars. We applaud the Department for its state-of-art system that accepts complaints about loans, other aid, and institutions participating in the Title IV program and that offers both English and Spanish in the system's online, phone, and chat functions.

However, our understanding is that, in February 2018, the Department acted to prohibit individuals reporting "suspicious activity" from doing so anonymously. It also prohibited commenters from describing broad problems that are not associated with a specific student, such as recruiting or financial aid policies or systematic behavior that is unlawful or otherwise harmful to students and taxpayers. Over the past year, reports of suspicious activity have dropped by almost 20 percent, even as the total volume of comments in the feedback system have more than doubled. This trend that may well be the result of actions by the Department that have the effect of deterring reports.

Although the Inspector General still accepts anonymous reports, the idea of the FSA Feedback system was to create a single point of entry for members of the public, rather than expecting them to know which complaints should go to IG and which to FSA. Also

an important goal for the system is to detect patterns, and that's harder to do with multiple systems.

We urge the Department to restore on the FSA portal the ability to identify suspicious activity anonymously and to describe systemic problems.

We are ready to assist you in any way we can to ensure student and borrower complaints are systematically accepted, tracked, and reported to protect students, help them make informed decisions, and improve oversight and accountability.

Signed,

American Federation of Teachers

The Education Trust

Generation Progress

The Institute for College Access & Success (TICAS)

National Association for College Admission Counseling (NACAC)

New America

Veterans Education Success

Young Invincibles