



February 26, 2024

Manager of the Strategic Collections and Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave, SW  
LBJ Room 6W203  
Washington, DC 20202–8240

Docket No.:ED–2023–SCC–0216

To whom it may concern:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA), we respectfully submit to the U.S. Department of Education (ED) our comments on ED’s Process for FSA ID Account Creation for Individuals Without a Social Security Number in Connection With Person Authentication Service (PAS), Docket No.: ED–2023–SCC–0216.

NASFAA’s membership consists of more than 29,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every 10 undergraduates in the United States.

While we are grateful for the opportunity to comment on the paper Attestation and Validity of Identity form for individuals without a Social Security number (SSN), NASFAA remains deeply troubled by the fact that individuals without SSNs are still unable to complete their portions of the Free Application for Federal Student Aid (FAFSA) without using a complex workaround, nearly two months from the already delayed launch of the 2024-25 FAFSA.

When a dependent student’s parents lack an SSN, it is likely due to the fact that their families are new to the U.S. They may not have had the same education, economic, and social advantages as their peers with American-born parents and, as such, are precisely the types of students we must ensure have access to the benefits of postsecondary education. One of the primary goals of FAFSA simplification efforts was to expand college access and success. We fear the inability of individuals without SSNs to complete the FAFSA will greatly undermine those goals.

We appreciate ED’s efforts to provide an interim solution for students who have been unable to complete a FAFSA because their parents do not have a Social Security number. But the interim solution — which will be confusing and burdensome to many — must not distract us from the need to stay squarely focused on a permanent fix, which ED has promised by the first half of March.

We offer the following recommendations to the paper Attestation and Validity of Identity form in the interest of ensuring individuals completing the form understand how to complete it and preventing mistakes that could hold up FAFSA completion.

In Section 1, the form uses the acronym “FSA” without having previously specified what it stands for. We recommend that ED replace “FSA” with “the Federal Student Aid (FSA) division of the Department of Education” so individuals understand both what the FSA acronym stands for and the relationship between FSA and the Department of Education.

The Section 2 instructions as written are duplicative and confusing in places. We recommend the following changes:

- Change the first step to, “1. Complete Section 3” since this is a required step for completion of the form and is not otherwise mentioned in the instructions.
- Change step 2 to read, “2. Read and sign Section 4: Attestation and Signature” so the instruction text matches exactly the form section it is referring to.
- Combine current steps 2-4 into a single step 3 since they all refer to submitting the form and required documents. The new single step should read, “3. Submit this form and the required documentation from Section 5 to: [IDVerification@ed.gov](mailto:IDVerification@ed.gov).”
- Change the current step 5 to step 4 so it reads, “4. Next Step – Within 1-3 business days, FSA will provide an email confirming that your identity has been verified.”

In Section 5, we offer the following suggestions and questions:

- We recommend that ED create a secure portal for individuals to upload documents since many of the acceptable forms of identity verification include sensitive personal information and personal email accounts are generally not secure.
- We believe a U.S. passport should also be acceptable documentation in Group A since it is possible to have a U.S. passport and not have an SSN.
- We recommend that ED explore adding more forms of acceptable identification documentation.
- We recommend that ED clarify what a Community ID is in the same way it describes what it considers a utility bill in footnote 1, to ensure the documentation individuals submit is acceptable for identity verification purposes.
- Since instructions only specify that the utility bill name and address match the information provided on the form, can ED confirm that other acceptable documentation does not need to have matching name and address information?
- In footnote 1 explaining what utility bill types are acceptable, we recommend that ED change “television” to use other language that explains this option more clearly. We offer “cable television service” as an option.
- Also in footnote 2, the instructions refer to phone bills. ED should be clear if this refers to mobile telephone bills and Voice over Internet Protocol (VoIP) plans, or if this option is limited to landlines.

In Section 6 we recommend that ED add, in addition to current language on how the information provided on the form will be used, information on how the information will not be used. This is of special importance to individuals without SSNs since they may have an undocumented citizenship status and be hesitant to share personal information with any entity of the federal government out of fear this information could be used against them.

Also in Section 6, in the second bullet under the heading, “These routine uses include the following...,” the IDR acronym is used but there is no indication of what the acronym stands for. We recommend that ED change this wording to, “Income-Driven Repayment (IDR)” for clarity.

We also recommend that ED create a dedicated call-in center for FSA ID issues for this population of individuals without SSNs. This process has been plagued with significant problems since the FAFSA launch in late December and students are understandably confused and concerned about their ability to complete the FAFSA. Call center staff should have access to translation services and should be trained to review identity verification documents so they can provide immediate answers to callers.

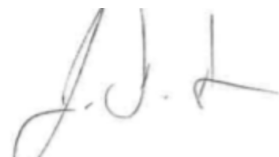
Finally, we note that the FAFSA Simplification Act requires the FAFSA to be available in 11 languages, and presumably applies to supporting documents like this form as well. Making this form available in as many languages as possible is especially important since people without SSNs are more likely not to have English as their primary language. It is critical that they have access to this document in a language with which they are comfortable.

We appreciate ED’s efforts to make it possible for all applicants to complete the 2024-25 FAFSA, including this form to assist individuals without an SSN in verifying their identity so they can obtain an FSA ID, and we are grateful for the opportunity to comment on this proposed form.

Regards,



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