



May 22, 2026

Sandi McCabe, Director
Integration Division
Program Technical and Business Support
Partner Participation and Oversight Directorate
Federal Student Aid
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202-0001

Docket ID ED-2026-FSA-0761

Dear Ms. McCabe:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit to the U.S. Department of Education (ED) our comments on its notice of a modified system of records for the National Student Loan Data System (NSLDS) (Docket ID ED-2026-FSA-0761).

NASFAA represents nearly 29,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every 10 undergraduates in the U.S.

We appreciate the Department's continued efforts to implement the student financial aid provisions of the One Big Beautiful Bill Act (OBBBA). We agree with ED's determination to amend the stated purposes of the NSLDS to add purpose 19 to identify, verify, and maintain records for borrowers who qualify for the interim exception to the new borrowing limits imposed by the OBBBA, and purpose 20 to support the implementation of new authority established by the OBBBA for institutions to set their own loan limits.

NSLDS is a critical system that financial aid administrators rely on every day to provide information necessary to ensure the accurate awarding of student financial aid. NASFAA continues to hear concerns from financial aid administrators that NSLDS data is often unreliable.

We are especially concerned about instances where new student loan information appears in NSLDS months — or even years — after aid has been disbursed.

When a student’s financial aid history in NSLDS is inaccurate, students may be unaware that they are close to their aggregate or lifetime limits, and may make choices that could harm them in the future, based on incomplete information. In other cases, financial aid administrators may be forced to adjust students’ aid packages when NSLDS is updated with older disbursement information that should have been provided on the initial Institutional Student Information Record (ISIR).

The Department must ensure that the information provided to institutions and students via NSLDS is accurate. This requires both correcting ongoing issues that have led to past inaccuracies and ensuring that changes to implement the OBBBA clearly and correctly reflect the individual student’s remaining eligibility. While we understand and appreciate that NSLDS is a repository of information originating from many sources, ED has a responsibility as the system’s owner and administrator to ensure accurate reporting, in addition to updating and maintaining proper coding to correctly calculate annual, aggregate, and lifetime borrowing caps.

We appreciate the opportunity to respond to the Department’s request for public comments regarding this modified system of records. If you have any questions regarding these comments, please [contact us](#) or NASFAA’s Director of Policy Analysis, Jill Desjean, at desjeanj@nasfaa.org.

Regards,

A handwritten signature in black ink that reads "Melanie E Storey". The signature is written in a cursive, flowing style.

Melanie Storey
President and CEO, NASFAA