



October 24, 2025

Docket ID ED-2025-SCC-0514

Carolyn Rose  
U.S. Department of Education  
Federal Student Aid  
400 Maryland Avenue SW  
Washington, DC 20202

To whom it may concern:

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 proposed revisions to the Application for Approval to Participate in the Federal Student Financial Aid Programs (Docket ID ED-2025-SCC-0514).

NASFAA represents more than 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 opportunity to provide feedback on the Application for Approval to Participate in the Federal Student Financial Aid Programs (E-App). We support many of the proposed revisions that are likely to reduce burden for both our member institutions and the Department, which should help expedite E-app processing and streamline the overall process by which schools apply to and request renewal of approval to participate in the federal student aid programs. At the same time, we remain concerned about the extended processing time for E-Apps, the inability to make subsequent changes while an application is under review, and the proposed changes to how an institution selects Title IV programs.

NASFAA welcomes the proposed rewording of certain questions, which will improve clarity and present the information in a more user-friendly way. We appreciate several changes where explanatory text would be added to improve understanding. For example, in section F, changing “effective date” to “first instruction date” and offering an explanation of “first instruction date” will help ensure schools respond accurately. We also appreciate offering autopopulated fields when appropriate in order to make the application more user-friendly. For example, in section Q, the proposed changes would display only the CEO or President/Chancellor entered earlier in the

application as the options for the signature authority. Having this as a pick list rather than open ended is an example of a small change that can speed up application completion and reduce confusion and errors.

Another very welcomed change is related to the removal of personal information required in section D. Our members expressed frustration with the amount of time it took to collect and enter personal information for multiple school officials as part of the E-App. NASFAA strongly supports the proposed change of only requiring this information for the President/Chancellor and emergency contacts at domestic schools in order to reduce burden, while still providing necessary information in case of emergency situations like school closures, data breaches, and natural disasters. Providing personal information for more than those contacts is unnecessary and burdensome with no apparent purpose.

Also, to reduce administrative burden, the new application would allow schools to self-certify their compliance with Title IV policies and procedures, eliminating the need to upload and have ED review them. NASFAA supports this change as it would reduce burden on schools as well as ED, which we hope will shorten the review and processing time for all applications.

Processing time would be shortened further with the proposed change to allow automatic approvals for simple updates. Examples of simple updates we suggest for automatic approval include change of officials, change in contact information, or change of the institution's name. We strongly urge ED to create this automatic approval process as quickly as possible, hopefully allowing many applications to move through the process without any intervention from ED staff, helping to reduce the current backlog.

While NASFAA greatly appreciates the efforts to simplify the application and reduce burden on schools, we do still have several suggestions for improvement. First, ED proposed a new method for selecting Title IV programs during the initial application process. Instead of requiring schools to choose the specific Title IV student aid programs they wish to participate in, the new application would only ask if they want to participate. Federal Student Aid (FSA) would then determine the programs for which the school is eligible. While the intention is to simplify the process for initial applications, schools may not want to participate in all programs for which they are eligible, and this new process does not allow for a school to indicate that they do not want to participate in a particular program. Presumably, this change does not require schools to participate in every program for which they qualify, but it remains unclear how a school would notify ED of the specific programs it chooses to participate in after receiving approval. NASFAA suggests continuing the current practice of requiring schools to indicate the specific Title IV programs they wish to participate in during the initial application process.

The new application adds a question related to an administrative capability regulation that went into effect July 1, 2024 [34 CFR 668.16(p)]. The new question asks schools to confirm they have developed procedures to evaluate the validity of a student's high school diploma if there is reason to believe it is not valid. For this question, there is a requirement to provide an explanation if the answer is "no." We suggest this also be the case for the other questions related to administrative capability in section L. There are 11 other questions related to administrative capability in this section, each stating "please provide an explanation." However, the new question (question 12) is the only question that shows an explanation is only required if the school's response to the corresponding question is "no." If it is possible to leave the explanation field blank on the other 11 questions, that should be clear in the *Application Questions* document and in the actual text of the application. However, if it is a required field for those 11 questions, NASFAA suggests changing this to match question 12 and only require an explanation when the corresponding answer is "no."

NASFAA also recommends providing a mechanism for schools to submit changes or updates as needed, even while an application is under review. Under the current process, once an application is submitted, schools cannot make any modifications until it has been reviewed and processed. This not only delays timely updates but is exacerbated by the lengthy review and approval process. In some cases, schools have waited several months for their applications to be processed, during which time any needed changes or updates cannot be submitted.

Building on this issue, NASFAA recommends that ED 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. The system is currently experiencing well-documented, significant delays. In July 2025, NASFAA conducted a national survey of financial aid administrators about the impacts of the March 2025 reduction in force (RIF) at ED. According to the [survey results](#), 64% of respondents reported longer-than-usual processing times for submitted E-Apps. While we hope some of the proposed changes will help expedite processing, a stronger commitment to predictable timelines is still needed. We also urge ED to provide timely updates to schools after application submission. Survey respondents reported frequent challenges in determining the status of their E-App, including receiving no response to inquiries or not knowing who at ED to contact for status updates. Some members have reported that their previous contacts are no longer at ED, but they are unable to reach current staff. Having built-in, timely updates as part of the process would be ideal, but at a minimum, schools should know who to contact for updates, and ED should ensure that responses are provided promptly.

Overall, NASFAA is pleased with many of the proposed changes to the E-App, but we also suggest further improvements specifically related to timing, processing, and communication. We appreciate ED's efforts to streamline the application and reduce burden on both schools and ED staff, particularly with the removal of required personal information for school officials, allowing automatic approvals for simple updates, and no longer requiring schools to upload policies and procedures for review. We encourage ED to build upon its proposed revisions, ensuring that only essential information is collected, that fields are autopopulated and skip-logic is used wherever possible, and that sufficient staffing is in place to support timely processing and effective communication with schools as needed.

We appreciate the opportunity to comment on the Department's public comment period regarding its proposed revisions to the E-App. If you have any questions regarding these comments, please [contact us](#) or NASFAA's policy analyst, Sarah Austin at [austins@nasfaa.org](mailto:austins@nasfaa.org).

Regards,

A handwritten signature in black ink that reads "Melanie E Storey". The signature is written in a cursive style with a large, sweeping initial "M".

Melanie Storey  
President and CEO, NASFAA