September 24, 2026

Corinne Sauri
U.S. Department of Education
Federal Student Aid
77 K Street NE
Washington, DC 20002

Docket ID ED-2026-FSA-2773

Dear Corinne Sauri,

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 the new (re-established) matching program between ED and the Social Security Administration (SSA) (Docket ID ED-2026-FSA-2773).

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

We support the re-establishment of the SSA-ED matching program and recognize that the match is critical to simplifying the Total and Permanent Disability (TPD) discharge process for borrowers who SSA identifies as disabled with Medical Improvement Not Expected (MINE) status.

In the August 25, 2026, Federal Register notice, the Computer Matching Agreement (CMA) does not accurately reflect the SSA-ED matching program. Portions of the Federal Register notice appear to inaccurately reference the Department of Veterans Affairs (VA), veterans, and VA disability ratings, rather than the SSA and MINE status information that is the subject of the SSA-ED matching program. These references appear to have been carried over from a separate VA matching program and do not correspond to the SSA-ED matching program.

The following are specific sections that appear to incorrectly reference the VA matching program:

1. In the Supplementary Information section, it states, "notice is hereby provided of the re-establishment of the matching program between the Department and VA."
2. In the Categories of Individuals section, it states, "This matching program covers veterans whom the VA has designated as having a service-connected disability rating that is 100 percent disabling or being totally disabled based on an individual unemployability rating, as described in 38 CFR 3.4(b) and 3.340, and who have title IV loans (as defined above)."
3. In the System(s) of Records section, it states, "VA has determined that routine use 39 in the foregoing system of records is compatible with the purpose for which the information is collected and contains appropriate Privacy Act disclosure authority."

We request that the Department review the notice and CMA and issue any necessary corrections to remove the references to the VA matching program and ensure that the CMA accurately describes the SSA-ED matching program.

We appreciate the opportunity to comment on the Department's public comment period regarding its SSA-ED matching program. If you have any questions regarding these comments, please contact us or NASFAA's policy analyst, Sarah Austin, at austins@nasfaa.org.

Regards,

Melanie E Storey

Melanie Storey
President and CEO, NASFAA