



November 10, 2025

Office of Planning, Evaluation and Policy Development
Federal Student Aid
U.S. Department of Education
400 Maryland SW
Washington, DC 20202

Docket ID ED-2025-SCC-0647

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 Information Collection for the Federal Student Aid (FSA) Feedback System (Docket ID ED-2025-SCC-0647).

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.

While the changes made to the student feedback page appear minimal, renaming the “Submit a Complaint” button to “Submit Feedback” signals a significant shift in the perceived purpose of the student feedback page. Upon navigating the submission process, the available options address scams, FAFSA issues, and loan problems, indicating a continued focus on grievances rather than general feedback. The discrepancy between the button’s labeling and the actual content creates confusion for borrowers seeking to report problems. If the intent is to solicit feedback, the menu options should reflect that. Conversely, if the page remains the primary channel for addressing issues and concerns, the button’s name should accurately reflect the function to ensure borrowers can easily find the appropriate avenue for assistance. The current mislabeling could artificially decrease the volume of complaints because students and borrowers aren’t aware of the opportunity to submit issues or concerns.

While “feedback” generally implies suggestions, opinions, or general commentary aimed at improvement, it lacks the urgency or seriousness of a formal complaint or a report of a specific problem. A borrower with a pressing issue might not intuitively understand that “feedback” is the correct channel for escalating such a matter. This ambiguity could lead to confusion, frustration, and delayed resolution of concerns, as the term does not clearly signal that the platform is for actionable problem-solving rather than just general input.

Related, the menu options a student encounters after initiating the process are items like "issues with my loans," "FAFSA form issues," "issues with my school," "repayment or loan forgiveness scam," and "technical issues," which unequivocally point to problem resolution, not general commentary. Each

selection clearly indicates a specific problem or grievance that requires attention and action, solidifying that the underlying intent is to report and address issues rather than merely "submit feedback."

For a clearer and more effective approach, we suggest transitioning from "Submit Feedback" to more direct and action-oriented language such as "Submit a Concern," "Report an Issue," or "Get Help With an Issue." These phrases better reflect the nature of the submissions, indicating that the platform is designed for individuals to bring specific problems, grievances, or matters requiring investigation to the Department's attention. This language change should be carried out throughout the website as necessary.

We commend the effort to simplify the language explaining the options, making them clearer and easier to understand. Reducing the number of choices and refining existing categories directly addresses potential confusion. Specifically, removing niche options like "Application Issues," "Delinquency or Default," "School Closure or Transcripts," and "Wage Garnishment" helps consolidate related concerns under broader, more accessible headings. The replacement of "Scam or Fraud" with the more precise "Repayment or Loan Forgiveness Scam" directly targets a prevalent area of borrower vulnerability, while the additions of "FAFSA Form Issues" and "Issues with my School" provide clear, intuitive pathways for common student concerns.

Aligning the terminology with the actual function of the student feedback page is essential for clarity and effectiveness. This change, coupled with the simplified and refined menu options, will reduce confusion, empower students and borrowers to report their issues or concerns more effectively, and ultimately lead to timelier resolutions and improved borrower experience.

We appreciate the opportunity to comment on the FSA Feedback System (Docket ID ED-2025-SCC-0647). If you have any questions regarding these comments, please contact us or NASFAA's Senior Policy Analyst, Megan Walter.

Regards,

A handwritten signature in black ink that reads "Melanie E Storey". The signature is written in a cursive, flowing style with a large, sweeping flourish at the end of the name.

Melanie Storey
President and CEO, NASFAA