



★ FROM THE OFFICE OF THE PRESIDENT ★

November 14, 2011

Docket ID ED-2011-OPE-0011

Response to NPRM on Application and Approval Process for New Programs
U.S. Department of Education

On behalf of the National Association of Student Financial Aid Administrators (NASFAA), I am responding to your request for comment on the Notice of Proposed Rulemaking addressing the application and approval process for new programs, published on September 27, 2011. NASFAA represents more than 18,000 financial aid professionals who serve 16 million students each year at 2,800 colleges and universities of all types throughout the country.

We support the proposed changes as written and appreciate the Department of Education's efforts to reduce administrative burden wherever possible. However, since these proposed changes were not specifically negotiated through the negotiated rulemaking process, we would encourage ED to solicit comment from the community after a reasonable period of time to assess how well these rules are working.

Sincerely,

Justin Draeger
President

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