



OFFICE OF THE PROVOST AND
EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

OFFICE OF THE PRESIDENT
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February 6, 2024

Via Federal eRulemaking Portal (www.regulations.gov)

Ms. Joanne Bogart
Manager of the Strategic Collections and Clearance
Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave, SW, LBJ, Room 6W203
Washington, DC 20202-824

Re: Docket ID ED-2023-SCC-0216, Process for FSA ID Account Creation for Individuals Without a Social Security Number in Connection With Person Authentication Service (PAS)

Dear Ms. Bogart:

Thank you for the opportunity to comment on the U.S. Department of Education's (Department's) notice for comment on the Federal Student Aid (FSA) ID and account creation process for individuals without a Social Security Number in connection with Person Authentication Service (PAS), as published in the Federal Register on December 26, 2023. We are pleased to submit this response on behalf of the University of California (UC).

The University of California benefits the nation through world-class education opportunities, groundbreaking research, top-rated health care, and agricultural expertise. The UC system includes 10 campuses, six academic medical centers, three national laboratories, and has more than 290,000 students, 240,000 faculty and staff, and 2 million alumni living and working around the world.

The University of California is committed to ensuring that all students, regardless of their immigration status, can pursue and attain a world-class UC education. This should include students and their mixed-status families having access to the Free Application for Federal Student Aid (FAFSA) form, which determines eligibility for not only federal aid, but also various grants and loans that all students, regardless of immigration status, need in order to determine financial aid packaging and college affordability. Since late December 2023, the Department has initiated a "soft launch" of its 2024-25 FAFSA Form. However, changes to the FAFSA form have been posing challenges for many mixed status families because they need to go through a separate process to attain an FSA ID, resulting in confusion as well as concerns about processing delays which can further impact a student's decision to attend an institution of his or her choice.

While the University appreciates the Department's efforts to quickly define an identity verification process for individuals without a Social Security Number, based on the feedback received from our campus partners who work directly with students from mixed status

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families, the University is concerned that students from mixed status families may continue to experience difficulties in navigating the new FAFSA during the full implementation period. The comments provided on the attached document are intended to address improvements to the identity verification process and aim at providing a clearer understanding of the process while balancing inclusivity and privacy concerns. The primary suggestions in the attached form address:

- Creating a simpler, more accessible option to obtain a case number given high call volume to Federal Student Aid Information Center (FSAIC)
- Adding alternative documentation to a utility bill as undocumented individuals may live with other documented family members who pay for those services
- Adding language about how the information will not be used (e.g. shared with other federal agencies) to the Privacy Act Statement Section

Additionally, where possible, the University requests that processing time be minimized and that the Department provide reliable access to customer support services throughout the cycle. The University is hopeful that a balance can be struck between fulfilling statutory requirements and meeting diverse student needs.

If you would like to discuss any of the issues raised by the University of California, please do not hesitate to contact Chris Harrington, Associate Vice President for Federal Governmental Relations. He can be reached at Chris.Harrington@ucop.edu or (202) 974-6314. Thank you for your consideration.

Best wishes,



Katherine S. Newman
UC System Provost and
Executive Vice President for Academic Affairs

UC Berkeley Chancellor's Distinguished Professor
of Sociology & Public Policy

Cc: U.S. Secretary of Education, Miguel Cardona
UC Federal Government Relations Associate Vice President, Chris Harrington