

**From:** NASSGAP <nassgap-bounces@lists.onenet.net> **On Behalf Of** Ballmann, Frank (HESC) via NASSGAP  
**Sent:** Wednesday, March 29, 2023 7:25 PM  
**To:** NASSGAP LISTSERV <nassgap@lists.onenet.net>  
**Cc:** Ballmann, Frank (HESC) <frank.ballmann@hesc.ny.gov>  
**Subject:** [Nassgap] NASSGAP Comments on FSA's Proposed Third-Party Servicer DCL

Good evening, everyone,

Earlier today, I submitted the following comments relating to the recent proposed regulation of third-party servicers, which some believe are intended to crack down on entities contracting with Institutions of higher education for recruiting, financial aid and other services, but some have interpreted the DCL more broadly. Here are the comments as submitted:

*"NASSGAP is asking for confirmation that state grant agencies are not considered to be a Third Party Servicer (TPS) under the DCL. State agencies provide over \$14 billion in grant and scholarship funding annually to students. Therefore, it would be far better for students if states devote their time and limited state resources to issuing awards to students and focusing on outreach efforts to serve students and families in each of our states through implementing the Better FAFSA. NASSGAP members are here to ensure that students and families benefit from the multitude of services provided by our states and do not want to see those services curtailed by an overly broad application of the TPS designation. Please confirm that state grant agencies are not considered as falling under the TPS definition. "*

If you or your agency are inclined to comment, the deadline is tomorrow, March 30. Feel free to use our comments as you see fit.

Frank

Frank Ballmann  
Director, Federal Relations  
National Association of State Student Grant and Aid Programs  
518-429-8773

