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national association of state student grant and aid programs
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**Comments on USDE Docket No.: ED-2013-ICCD-0125
Student Aid Internet Gateway (SAIG) Enrollment Document
September 18, 2013**

October 28, 2013

These comments are in reference to the new Participation Agreement between the U.S. Department of Education and State Grant Agencies that outlines the conditions under which the Department will permit disclosure of certain data received or generated by the Department concerning FSA applicants.

The current proposed regulations permit disclosure of information on Free Application for Federal Student Aid (FAFSA) filers to Local Educational Agencies (LEAs). We applaud this effort to work with LEAs in promoting FAFSA completion.

However, the current proposal limits these disclosures to LEAs. Numerous private, parochial, charter, and cyber high schools could benefit from the receipt of this FAFSA information to promote college attendance among their senior classes. Limiting the outreach effort to only public institutions eliminates many students from these outreach efforts. States should have the flexibility to identify schools serving at-risk and first generation students that would benefit from this initiative.

There is no indication regarding the content requirements of the legal agreement that must be executed between the participating LEA and the State Grant Agency for disclosure of the FAFSA filers. For simplicity purposes, it would be beneficial for the U. S. Department of Education to issue such a document to ensure that all federal contingencies are addressed.

LEAs are not permitted to re-disclose the FAFSA filers information received from the State Grant Agency to a third party. However, many school districts work closely with a number of third party providers of college readiness activities and programs such as TRIO. Having the ability to share this information with these third parties would greatly enhance the collaboration among these entities in promoting students to apply for financial aid.

NASSGAP would be happy to discuss any of these features with USDE officials for further clarity. Thank you for your consideration.

Sincerely,

Christine A. Zuzack
President
NASSGAP