

FSA Response to Comments

Carol Lindsey
Vice President Policy and Compliance
Texas Guaranteed Student Loan Corporation
P.O. Box 83100
Round Rock, TX 78683
Carol.lindsey@tgslc.com

Dear Ms. Lindsey,

Thanks you for your comment regarding the information collection associated with the Personal Authentication Service (PAS) for the FSA ID. Below please find a response to the comments identified in your submission.

Comment Summary: Recommendation to delete the option to create a “limited FSA ID”
FSA has removed the option to create a limited FSA ID.

Sincerely,

Catherine Metcalf
Project Manager

Becky Pribyl
Aberdeen, SD 57401
Becky.pribyl@northern.edu

Dear Ms. Pribyl,

Thank you for your comments regarding the information collection associated with the Personal Authentication Service (PAS) for the FSA ID. Below please find responses to the summary comments identified in your submission.

Comment Summary: New process is confusing and a barrier to completing the FAFSA

The new process mirrors industry best practices and was developed to minimize barriers while maintaining security. FSA is required to safeguard a user's personal information. Without the changes we are implementing, information could be vulnerable to an external attack.

Comment Summary: Request for number of Forgot PINs to be published on FSA's website

FSA has referred this question to the appropriate business unit for review.

Comment Summary: Password should be valid for more than 15 months

User passwords are valid for 18 months.

Comment Summary: Duplication with FAFSA which asks for a password

To eliminate confusion, the FAFSA on the Web transaction password field will change to "Save Key."

Sincerely,

Catherine Metcalf

Project Manager

Deanne Loonin

National Consumer Law Center (NCLC)

7 Winthrop Square

Boston, MA 02110-1245

dloonin@nclc.org

Dear Ms. Loonin,

Thank you for your comments regarding the information collection associated with the Personal Authentication Service (PAS) for the FSA ID on behalf of the clients of the NCLC. Below please find responses to the comments identified in your submission.

Comment Summary: Balance of Security and Access

It is important to balance security and access for users. Specifically, the FSA ID password will be valid for 18 months before requiring it to be reset. Thank you for your recommendation to notify servicers when a password requires resetting. This recommendation will be considered as part of future releases.

Comment Summary: Curbing Improper Third Party Access to Borrower Identification Information

FSA has referred this recommendation to the appropriate business unit for review.

Thank you again for taking the time to provide comment on the information collection associated with the new FSA ID, Person Authentication Service.

Sincerely,

Catherine Metcalf

Project Manager