



GRADUATE, UNDERGRADUATE AND EQUITY AFFAIRS

OFFICE OF THE PRESIDENT  
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Oakland, California 94607-5200

November 7, 2024

Kun Mullan  
PRA Coordinator  
Strategic Collections and Clearance Governance and Strategy Division  
Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Federal Student Aid (FSA) Partner Connect System and User Access Management  
Docket ID ED-2024-SCC-0096

Dear Mr. Mullan:

On behalf of the University of California (UC), one of the country's premier public research university systems, serving more than 295,000 undergraduate and graduate students, we appreciate the opportunity to provide comment on the October 8, 2024 notice of Request for Information regarding the proposed change to the Federal Student Aid (FSA) Partner Connect System and User Access Management, as referenced in Docket ID ED-2024-SCC-0096.

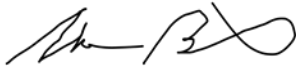
We appreciate the drive towards consolidation of access management for several federal systems as noted. However, while we understand the need, we would encourage the department to focus its time and resources to ensure it is positioning itself to focus on maximizing technical resources for the support of the Federal Student Aid (FAFSA) form as well as its delivery and any subsequent corrections processes. Our campuses would prefer to have a reliable FAFSA application system and therefore urge the department to deprioritize other technical transitions, such as the one proposed in this information collection effort—especially as the Department is currently in beta testing mode for the 2025-2026 FAFSA application.

Should the department pursue the transition, UC would like to stress the importance of adequate testing before implementation. As an example, the new certification process implemented as part of the transition to the FSA Partner Connect System created obstacles for some campuses, such as being unable to complete certification when changes in leadership structure resulted in a required signatory being unavailable. Therefore, we encourage conducting significant user access testing alongside consideration of secondary measures that address any potential roadblock to ensure a smooth transition and minimal opportunity for delays in a campus's ability to administer

federal student aid. Additionally, we would like to get clarification on how the department plans to address this consolidation and any possible impact on the E-application process as this system is not part of the identified group.

The University of California appreciates the opportunity to comment on the Department of Education's plan to consolidate access management systems. If you have any questions regarding these comments, please contact me at [Shawn.Brick@ucop.edu](mailto:Shawn.Brick@ucop.edu) or 510-987-9872.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shawn Brick', with a stylized flourish at the end.

Shawn Brick, M.P.P.  
Associate Vice Provost, Student Financial Support  
University of California, Office of the President

cc: Provost and Executive Vice President Katherine S. Newman, Academic Affairs  
Interim Senior Vice President Meredith Turner, External Relations and Communications  
Associate Vice President Chris Harrington, Federal Governmental Relations