

September 16, 2022

Juliana Pearson  
U.S. Department of Education  
400 Maryland Ave. SW  
LBJ, Room 6W208D  
Washington, DC 20202-8240

Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

RE: Docket ID ED-2022-SCC-0096

Dear Ms. Pearson:

This letter is in response to the request for comments on the Guaranty Agency Security Self-assessment and Attestation published in the Federal Register on July 19, 2022.

Ascendium Education Solutions, Inc. (Ascendium) is the nation's largest student loan guarantor and constantly strives to better protect and secure borrower data. Ascendium applauds the Department for taking concrete steps in this direction and for working with guaranty agencies to prepare for the move from NIST 800-53 R4 to R5. Ascendium agrees with the Department's hour estimate for the assessment itself, but cautions that the research, development, and implementation of controls necessary to move from R4 to R5 will require thousands of hours of guaranty agency work. The earliest agencies could assess and attest to these controls is fiscal year 2024; any earlier would likely result in audit issues for both guaranty agencies and the Department. FSA personnel working with guarantors have verbally agreed with this timeline, so we ask that FSA publicly confirm it in the comment response document.

The Department should work with guaranty agencies to better protect borrower data in an additional area: Mandatory Assignment. Dear Colleague Letter GEN-21-03 requires guarantors to assign all loans that default during pandemic flexibilities to the Department, and the Department's preliminary discussions around Operation Fresh Start and other plans involve further assignment of additional loans. Assignment is currently a very manual process, involving the printing, boxing, and shipping of millions of documents, many of which contain personal identifiable information. Ascendium encourages the Department to work with guaranty agencies to develop an electronic process that will be vastly more secure, efficient, and organized for the millions of loans that will be assigned.

Thank you for time and the opportunity to comment.



Jeff Crosby  
President and CEO, Ascendium Education Solutions, Inc.