



February 10, 2023

Mr. Richard Blasen
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Dear Mr. Blasen,

On behalf of the undersigned organizations, we write to offer comments on the proposed changes to the REPAYE income-driven repayment (IDR) plan under Title IV of the Higher Education Act (HEA) offered by the Department of Education (Department), as detailed in Docket ID ED-2023-OPE-0004-0001.

The proposal offered by the Department takes necessary steps to help reduce the burden of repayment for many borrowers, particularly those who are having trouble repaying their student loan debt. The proposal contains numerous recommendations offered by the higher education community in recent years, and we are grateful for their inclusion. In addition, the Department made a sensible choice to incorporate these changes as a revision of the existing REPAYE plan rather than create a new plan, thereby avoiding adding to the existing confusion by creating another new repayment plan.

In the absence of legislative action, we understand that the Department believes it must use its regulatory powers to help student borrowers repay their loans and to correct the burdensome and needlessly complicated repayment system. A comprehensive effort to review the entirety of our lending and repayment system, along with a complete reauthorization of the HEA, is long overdue. This would be the most effective way to address problems with loan repayment policies in a holistic way. We encourage the Department to work with Congress toward this end.

With those qualifications aside, the REPAYE proposals will provide substantial benefits for borrowers who are least able or unable to repay their debt. In particular, we support including provisions in the new REPAYE proposal to:

- automatically enroll borrowers in IDR;
- raise the threshold of protected income;
- eliminate the growth of unpaid interest on income-driven plans;
- allow for an accelerated path to forgiveness for low-debt borrowers; and
- allow greater access to switch to IDR plans.

Providing borrowers access to a repayment plan that includes these elements is an important and long overdue correction. But piecemeal changes fall short of all that is needed. We commend the Department for the comprehensive approach taken in the NPRM, and we hope

Congress will incorporate aspects of these changes in the HEA. We will remain supportive of ways to ease the repayment burden on students and hope to see a solution that will allow for more consistency across repayment plans for all borrowers.

We appreciate your attention to these comments.

Sincerely,



Ted Mitchell
President

On behalf of:

ACPA-College Student Educators International
American Association of Colleges and Universities
American Association of Colleges for Teacher Education
American Association of Colleges of Nursing
American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of State Colleges and Universities
American Association of Veterinary Medical Colleges
American Council on Education
American Dental Education Association
American Indian Higher Education Consortium
APPA, "Leadership in Educational Facilities"
Association of American Universities
Association of Catholic Colleges and Universities
Association of Community College Trustees
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
Career Education Colleges and Universities
Council for Higher Education Accreditation
Council for Opportunity in Education
Council of Independent Colleges
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
National Association of College and University Business Officers
National Association of Colleges and Employers
National Association of Independent Colleges and Universities
National Association of Student Financial Aid Administrators
National Association of System Heads
State Higher Education Executive Officers Association