

DEPARTMENT OF EDUCATION  
OFFICE OF POSTSECONDARY EDUCATION  
NEGOTIATED RULEMAKING  
REIMAGINING AND IMPROVING STUDENT EDUCATION (RISE)  
SESSION 1, DAY 3, MORNING  
October 1, 2025

On the 1st day of October, 2025, the following meeting was held in-person, from 9:00 a.m. to 12:00 p.m.

## P R O C E E D I N G S

MS. WEISMAN: Good morning, everyone. Welcome back. Happy Wednesday. Just a couple of quick announcements. As you are speaking, if you are speaking, remember to use your microphone. Turn it off when finished. But when you're speaking, if you could have it a little bit closer to you so that they can pick up the sound better on the live stream. Apparently, some have been a little quieter than others, and we'd like to make sure that everyone is heard. Another reminder is when you are submitting documents to the [negregfacilitator@ed.gov](mailto:negregfacilitator@ed.gov) email address, please put your name and the name of anybody else who you're submitting on behalf of, as well as your constituencies up at the top. That makes it a lot easier as we're forwarding those out to others to view so that they know exactly where that comes from. And as we get started, the Department has asked for a caucus. Do you have any announcements before we do that?

MS. ABERNATHY: That's really loud. Can we do roll call, and all that first, and then we'll proceed?

MS. WEISMAN: Yes, we can.

MS. ABERNATHY: Thank you so much.

MS. WEISMAN: So we will do roll call first, then. If we can start with the legal assistance

organizations that represent students and borrowers, consumer advocates, and civil rights groups that represent students. Primary?

MS. NAPORLEE: Ashley Naporlee.

MS. WEISMAN: Alternate?

MS. HOFFMAN: Tamar Hoffman.

MS. WEISMAN: Thank you. Student loan servicers, collection agencies, lenders, and guaranty agencies, primary?

MR. RICCI: Alex Ricci is present.

MS. WEISMAN: Alternate?

MS. HARTUNG: Lori Hartung.

MS. WEISMAN: Organizations representing taxpayers in the public interest, primary?

MR. HOLT: Alex Holt.

MS. WEISMAN: Alternate?

MR. GILLEN: Andrew Gillen.

MS. WEISMAN: Private nonprofit institutions?

MS. COLVIN: Jenna Colvin.

MS. WEISMAN: Alternate?

MS. KOHLER: Patti Kohler.

MS. WEISMAN: Proprietary Institutions. Primary?

MR. VAUGHN: Andy Vaughn.

MS. WEISMAN: Alternate?

MR. BODIMER: Jeffrey Bodimer.

MS. WEISMAN: Public Institutions.

Primary?

MR. KING: Timothy King.

MS. WEISMAN: Alternate?

MR. ELLSWORTH: Matt Ellsworth.

MS. WEISMAN: State officials.

Primary?

MR. KEMP: Scott Kemp.

MS. WEISMAN: Alternate?

MR. BOGGS: Bennett Boggs.

MS. WEISMAN: Student loan borrowers.

Primary?

MS. ABERNATHY: Deborah Lilly.

MS. WEISMAN: Alternate?

MR. OGUH: Emeka Oguh.

MS. WEISMAN: Student loan borrowers

who are veterans US military service members or groups representing them. Primary?

MR. SULMAN: Present. Faisal Sulman.

MS. WEISMAN: Thank you. And I

understand that their alternate will be here later today, Robert Carey. We have our Federal negotiator. We have our Office of General Counsel, and we have Jeff Andrade, also

with the Department here with us.

MS. ABERNATHY: We are present.

MS. WEISMAN: Awesome. So then let's move to that caucus. What I have is a request from the Department for the Department officials and staff for 20 minutes with the following five constituencies. Taxpayer and the public interest. The second one is private, nonprofit institutions, proprietary institutions, public institutions, and state officials. So that will be for approximately 20 minutes. And if we need an extension on time, they will let us know. Good morning again, and welcome back from the caucus. Tamy, are you prepared to give a report out on the caucus?

MS. ABERNATHY: I am. I just put a cough drop in my mouth. Excuse me. Based on the counter proposal that we received from our constituents, we are happy to report out that there is a deal on the table, a compromise of sorts for the definition of a professional degree. But what we would like to do now, I apologize for all of this, but we would like to caucus with the rest of you, including Alex and Andrew, to explain and give you the same opportunity that we gave them to hear their voice. We want to do the same with you all. So we're calling a separate caucus with everybody else. If you would just raise your hand, so Anmarie -- everyone,

including Alex and Andrew, please.

MR. BOGGS: (inaudible) Alex, two  
Alexs.

MS. ABERNATHY: Alex -- Andrew's the  
alternate.

MR. BOGGS: Okay.

MS. ABERNATHY: Look, I did that  
yesterday, and I've already called him Andrew twice.

MR. BOGGS: Yeah.

MS. ABERNATHY: I should say Alex  
squared.

MR. ANDRADE: Alex squared, yes.

MS. WEISMAN: So you're asking for  
primaries and alternates?

MS. ABERNATHY: Yes.

MS. WEISMAN: Okay. So we'll have  
Faisal. Faisal's alternate is not present this morning.  
We also have Ashley and Tamar.

MS. ABERNATHY: Mm-hmm. Deborah and  
Emeka. But I don't see Emeka in the room at the moment.  
We will have Deborah Lilly.

MS. WEISMAN: So Deborah.

MS. ABERNATHY: Deborah and Emeka.

MS. WEISMAN: Alex Holt.

MS. ABERNATHY: Alex Holt. Alex Ricci.

Andrew Gillen. Lori Hartung. Did I pronounce that right, Lori?

MR. ANDRADE: And Matthew Ellsworth.

MS. ABERNATHY: Yes, and Matthew Ellsworth. Timothy and Matthew will also be with us.

MR. ANDRADE: Oh, sorry I let you off. Yeah. Sorry, guys. I'm sorry.

MS. ABERNATHY: He confused me again.

MS. WEISMAN: Okay, so let's just recap to make sure I have it right.

MS. ABERNATHY: Andrew, Alex Holt, Lori Hartung, Alex Ricci, Deborah, Emeka, Faisal. We don't have Bob Carey, and we have Ashley and Tamar.

MS. WEISMAN: Okay. And how long do you think you'll need?

MS. ABERNATHY: 20 minutes. We'll start there.

MS. WEISMAN: Thank you very much.

MS. ABERNATHY: So, let's go on a field trip.

MR. SULMAN: Bob says he's on his way.

MS. WEISMAN: Good morning and welcome back. We have staff and negotiators back from the caucus, and we'd like to do a report out from Tamy.

MS. ABERNATHY: Thank you, everybody.

We very much appreciate everyone's patience. We certainly did not anticipate that it would be three full hours of a caucus. But it is time well spent. What the Undersecretary has proposed to two separate caucus members is to have a bifurcated approach to the professional degree definition. And seeing as everybody in the negotiating committee has heard this already, we don't really have to go into too much detail. We had the first constituency group that we called in agrees with our proposed amendatory, or our proposed path forward with creating an A and a B. Our second constituency group needs a bit more time, but we were bumping up against the noon hour for lunch, so I'm hoping that maybe through the lunch hour, you all can continue to have your conversations and circle back. We do have someone working on reg text right now. That is the only piece we are willing to provide analyses on because we feel -- we have heard you say it's hard to conceptualize this without seeing it. We're not going to go and have our costs, our baselines reassessed or chart up the course through OMB or any of those things at the moment, because we will not do that. As you know, this is a one-shot stop offer. If it goes off the table, then there will not be consensus. And therefore, this bifurcated approach to the definition will go away. I think Undersecretary Kent was, was

crystal clear on that piece. So we will break for lunch. I would like to quickly go over, as we do usually in the morning, but we're doing it now before the morning is over, is to talk briefly about the things that you've submitted for us to take a look at. Alex Holt, we are looking at your, your situation, and we are currently trying to negotiate around that. So thank you for the degree, the professional degree, your proposal, your memo, and all of those wonderful things. Jenna, could the Department develop a definition of professional master's degree program and require these programs to separately report to IPEDS? We have somebody, Jason Delisle from our -- he's a chief economist, and he is looking into this. Is that not correct?

MR. ANDRADE: No. I will convene the sidebar with Jason.

MS. ABERNATHY: Jeff will convene a sidebar with Jason Delisle, chief economist. So that will be handled separately, and you. So the three of you will have conversation. Sorry, I misspoke on that. Forgive me. So the -- Scott, when you sent us your list of questions, we went through some of them. And I think what would be best is if we held that until tomorrow, so. Absolutely, sir. Thank you so much. So, Tamar and Ashley submitted the official question cases where borrowers are placed in

the Tiered Standard Plan, where their balance places them in a repayment term of ten years. Can the borrowers elect to make payments that not less than would have been paid under the ten-year standard, under the Repayment Plan, under 685.208(b) in order to qualify for PSLF? We do not believe that is permissible. We will reevaluate that just to confirm. Bob, we discussed this yesterday, that -- I think we already answered your question, so I think I may be just down to the hypotheticals now. Okay. That is our report out from yesterday. Did anyone submit something that we did not go over? Okay, great. So, is there any question or comments that you have? We have 11 minutes before lunch.

MS. WEISMAN: Ashley?

MS. NAPORLEE: I just wanted to inform you that we did submit something else, a couple of things this morning, so I don't -- I'm sure you haven't had a chance to look, but I just wanted to make you aware of that.

MR. ANDRADE: That's last night's.

MS. ABERNATHY: Yeah, that's just last night. We don't do the morning stuff until usually the next day. So I'm looking for it. I'm like, I don't have it yet.

MS. NAPORLEE: Oh, no. That's fine. I

just wanted to make you aware.

MS. ABERNATHY: Yes. Thank you. Did you see me frantically looking through my papers?

MR. LALLO: Email them.

MS. ABERNATHY: Anyone else have anything for the good of the order? At this time, Annmarie, seeing as there's no additional business that needs to be discussed, we recommend that we break early for lunch to allow the constituents a few more minutes to speak to each other on behalf of the things that they are concerned about, from what we've discussed in the caucus sessions.

MS. WEISMAN: Okay. Then we'll break for lunch for an hour and ten minutes, and we'll resume at 1:00 Eastern time. Thank you.

MS. ABERNATHY: Thank you so much.