

Draft - Defining "Program of Study" in 34 CFR 685.203 (Submitted by Alex Ricci)

Submitted jointly by the Taxpayers and Public Interest and the Student Loan Servicers, Collection Agencies, Lenders, and Guaranty Agencies constituency groups.

RE: Loan Limits for Parent PLUS Borrowers During Transition (34 CFR 685.203)

After robust discussion around the table this morning, we believe that defining "program of study" to mean "a program that confers an associate's or baccalaureate degree" is an overly broad interpretation that is ultimately more harmful than helpful. Furthermore, we believe that OBBBA uses "program of study" in many areas of the bill and a plain-text reading suggests that Congress intended "program of study" to be a consistent definition throughout the bill. Therefore, defining "program of study" differently in one part of the new regulations compared to the other provisions is inconsistent with the law.

We recommend the Department revert to its originally proposed regulatory language.