DEPARTMENT OF EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

NEGOTIATED RULEMAKING

STUDENT DEBT RELIEF COMMITTEE

SESSION 1, DAY 2, AFTERNOON

OCTOBER 11, 2023

On the 11th day of October, 2023, the following meeting was held virtually, from 1:00 p.m. to 4:00 p.m.

P R O C E E D I N G S

MR. WEATHERS:

Hello everyone, and welcome back from lunch. My name is John Weathers. I will be facilitating the afternoon session here today. A couple quick housekeeping things. Please remember the comments kept to a three-minute period. There will be a 30-second warning when that time runs. Also, please keep in mind that we're endeavoring to have new conversation. If you want to reiterate something that someone else has said, please do so in the chat. Also, place questions in the chat and also if you are an alternate that's going to be coming to the table, please notify us and the primary, please turn your video off when we do that. Just real quick. Jalil Mustaffa Bishop will be sitting at the table in place of Richard Haase. So, I will hand it off to the Department.

MS. ABERNATHY:

Thank you, John, and welcome back everyone. I'd like to pose a question to the committee. Do we feel that we have heard from all of you on the comments that you have in reference to the GE question, or do we need to have continued conversation?

MR. WEATHERS:

Anyone?

MS. ABERNATHY:

I suggest we go ahead and go on to question number five. Thank you, Rich, for sharing that question. The Higher Education Act, as amended, contains a number of programs designed to provide targeted relief to borrowers. For instance, we have forgiveness programs for borrowers who pursue public service, whose schools closed, whose schools engaged in misconduct, or borrowers who have a total and permanent disability. We also have forgiveness programs for borrowers after they've made payments for a certain period of time. But the student aid programs serve a large number of Americans. With 44 million student loan borrowers, it's helpful to receive input on additional situations where a borrower may be facing struggles that are not captured by an existing program, even if they would be deserving of relief under the broad structure of the Higher Education Act. Borrowers who experience hardship with respect to their student loans may have certain ways to reduce or delay loan payments or seek forgiveness on their loans. Yet, borrowers may continue to experience hardship in ways that the current student loan system does not adequately address. The Department would like your feedback on the following question. What are potential types of hardships that borrowers continue to face, and how might we address those cases of hardship?

MR. WEATHERS:

Okay, let's open this up for discussion. I see Vincent Andrews. Please go ahead, sir. You're muted. Vincent, you're on mute.

MR. ANDREWS:

Oh, there we go. Can you hear me? So, yeah, I had a few points that I jotted down earlier that I thought really applied to waiver distribution in general. One of the points John had brought up earlier related to how disabled, injured and incapacitated, even elderly individuals who face substantial hardship, there's really no streamlined way for family members to, I guess, do anything in the instance that somebody is really injured and they can't get online and apply for deferment or forbearance. And under some of these circumstances, people lose their ability to ever be fully employed again. So, there should be some consideration made regarding the waiver about what we can do for individuals who reasonably can't be expected to gain full working capacity in the future. Another one that I had was hardships that might be created due to waiver distribution. So, again kind of touched on it yesterday. Individuals struggling the most may have minimal benefit to a blanket waiver. In addition, blanket waiver may increase the payment of some borrowers so the equity between what they owe and what they make, a borrower who maybe owes 30 and has to make a payment of zero may end up, in fact, having to make a payment of a few hundred dollars if they were to get some of that waived. The next one was debt prevents individuals from pursuing professional training and education that they needed. Someone mentioned earlier related to small business owners. A lot of people don't go back to school and get the training and education they need to be successful in things that they actually want to do, because, I mean, they're really afraid to get more debt in most cases and I actually know people who have even had their transcripts or their degrees withheld because they have student balances that haven't been paid. And then the last one, there should be benchmark incentives or I think, some idea of benchmark incentives for high-stress, low-paying occupations like teachers, nurses who traditionally have high rates of turnover and are likely to leave their fields in the first 2 to 3 years if they aren't enjoying it. I think some sort of like benchmark waivers might be some good incentive for people to stay in positions that are well needed.

MR. WEATHERS:

Thank you, Vincent. Angelika, please.

MS. WILLIAMS:

Okay. I recognize that the central theme of this query pertains to financial strain, but the misalignment between the previous question or question number three and this question, question number five, underscores the urgency of the Department's clarification regarding the definition of financial value. Because question number five, this question acknowledges there are higher education programs that provide quality education, yet external factors significantly affect borrowers. It is important to highlight the adverse influence that student loan debt has on credit ratings, which in turn impacts individual's ability to purchase homes, vehicles and, most crucially, their credit worthiness of employment. Student loans adversely affect credit scores, amplifying financial stress due to their influence on debt to income ratios. In light of this, I request that the Department review its procedures and policies related to the debt reporting to consumer reporting agencies and because of credit worthiness employment, I propose that the Department consider debt waivers based on job market dynamics as well as economic factors.

MR. WEATHERS:

Ashley?

MS. PIZZUTI:

I want to follow up on what she had said. From my personal experience with having these loans for 20 years. I also run a small business. My husband and I run a photography studio. We have never been able to get a business loan because of the student loans on our credit report, because our income to debt ratio is too great. This also includes our private loans, which would not be considered under this. But it is one of the reasons why we've never been able to get a mortgage. We've never been able to get a small business loan. And it all comes down to the fact that we've had these student loans on our credit report for 20 years. I also know several teachers that have left teaching because they just accumulated so many student loans and they were paid- you know, there's a lot of other factors in there in the teaching and the red tape, but it really came down to the fact that they owed so much money on their student loans and were not making enough to make it worth it for them to stay in the profession.

MR. WEATHERS:

Thank you, Ashley. I would like to make a note that Jordan Nellums is going to be coming in at the table, and Jada Sanford will be sitting out with her video off for currently enrolled postsecondary education students.

And next, I'd like to ask Lane Thompson to speak.

MS. THOMPSON:

Thanks, John. In terms of hardship, I just want to talk about incarcerated borrowers. We incarcerate more people in this country than any other nation on earth, and a lot of those folks have student debt. I used to work as a student loan coach, and in that program, we had a small dollar lender who went into the prisons and did these credit building loans. It's a really cool product. But she found that a lot of folks that she worked with had student debt and didn't have any way to address it. They didn't have access to the internet. They couldn't stay on the phone long enough to talk to their servicer. There just wasn't any option for them. So, I really think that that's also a pretty discrete and identifiable group of folks who are currently incarcerated, or even folks who have been incarcerated in their lifetimes. Definitely a group that I want to make sure we consider.

MR. WEATHERS:

Thank you. Next, Ms. Taylor.

MS. TAYLOR:

So, I'd like to call attention to some of the other forms of debt or hardship that are not currently recognized within the student loan system that often come up when low income people are talking to a legal aid attorney. Folks often cite the cost of medical care and mental health costs, even where they have potentially a low dollar IDR amount can still prevent them from being able to pay, from being in the position where they have to choose between paying for their medical debt or mental health costs and paying for their student loan debt. In addition, child care costs are extremely expensive in this country. They have risen at faster than the rate of inflation. But child care costs are not included. That includes the cost of day care, aftercare, summer care, holiday care, medical care for children, which is exacerbated if you have a child with special needs. And just by way of example, the US Department of Agriculture estimates that raising a child through the age of 17 costs 200, 333, and 610 dollars on average. In addition, we hear from borrowers who struggle with balancing the costs of caregiving for aging parents and other dependent adults. This also may impact their ability to maintain employment as well. So, they may have income, but that income is being drawn down by these other expenses. And in addition, and perhaps most significantly, there are significant regional differences in the cost of living that are not taken fully into account by the IDR plans. This means that some borrowers who are low income borrowers are in the horrible position of having to choose between paying for their housing costs or paying for their student loan debt. And so, I think all of these factors should be considered when we're thinking about hardship. And I would just like to lift up what Lane said about incarcerated borrowers as well, that oftentimes they have no way of contacting their servicers. And the Department could find information and discharge the debt of folks who have been incarcerated for five years or more.

MR. WEATHERS:

Next, Yael.

MS. SHAVIT:

Thank you. I won't belabor repeating what Kyra and others have just said. I do also want to emphasize the importance of providing relief for people who are incarcerated, and also flag that family members of people who are incarcerated, particularly women of color, bear significant financial burden associated with having an incarcerated family members, and that should also be taken into consideration. One thing that I want to note as well as that, think here to the Department should be looking for indicia of hardships that can be ascertained based on data that's available to the Federal Government, including other agencies, to minimize the burden of people, burden on people, you know, sort of proving this hardship. And to that end, I think that the Department should consider as a hardship when folks have had, you know, administrative garnishment and they're EITC withheld, which is, I realize, not a problem focus of this rulemaking. But it's a big problem. And I think it's something that the Department should consider in the context of identifying people who are facing hardships. And I'd like to add to the list as well, disproportionate private student loan debt, particularly student loan debt that's associated with institutional debt from for-profit schools and the like, that that's something the Department should be taking into consideration. Thank you.

MR. WEATHERS:

Thank you. Quick note. Scott Waterman is going to be coming in for Kyra Taylor as- at the table in place of Kyra Taylor for legal assistant organizations that represent students or borrowers. Next up, Ed Boltz.

MR. BOLTZ:

Thank you. I would like to reference that and again thank- the Department did a very good job. Not a great job, but it's within the limits of what can be done in these sorts of things. With the student loan guidance that was issued with the- regarding bankruptcy discharges. I would hope that whatever rulemaking can come out of this would both reference- would look towards that perhaps but also reference that because thus far, in the almost one year that we've been working to get student loan discharges in bankruptcies, the Department's- attorneys at the Department of Justice and the assistant US attorneys have often stood athwart its- the Department's own goals, despite being the actual client who directs this. So, the- to the extent that, you know, anything can be incorporated regarding that in these rulemaking, I think that would strengthen the hand of both the Department and consumer advocates in seeking student loan discharges for people who are in bankruptcy. Thank you.

MR. WEATHERS:

Thank you very much. Next, Jordan.

MR. NELLUMS:

Yes. Thank you. Well, I wanted to give you all my personal story. So, when I first decided to attend college, I realized that I would not- that I would have to rely on student loans to attain college, and I was adamant that I did not want my parents to be in a bad situation to support me in college. But ultimately didn't care what I wanted, and they emphasized that they would support me and my twin at all cost. And due to their commitment, my father, who never went to college himself, took out Parent PLUS Loans for me and my twin. And as of today, my father has nearly $100,000 in Parent PLUS Loans and is not expected to finish paying off the loans until the age of 84, and recently commented how he thinks he'll end up having to work for the rest of his life. I think that should be considered a hardship. In its recent public statements regarding the introduction of the SAVE Plan and why Parent PLUS Loan borrowers were excluded from that plan, the Department makes the following assumptions. The Department states that many Parent PLUS Loan borrowers are more likely to have a clear picture of whether or not their loan is affordable, and I think this couldn't be further from the truth, as my dad never attended college and my dad was not familiar with the student loan process, which I'm sure is a similar experience that so many different first-generation college students and their families experience. Additionally, my father was never aware that his Social Security benefits could be at risk as well. The second assumption that the Department makes is because Parent PLUS Loan borrowers do not directly benefit from the educational attainment of the degree or credential achieved, the Parent PLUS Loan will not facilitate investments that increase the parent's own earnings. This, I also agree, is flawed. I obtained a college education because of my dad's support in taking out a Parent PLUS Loan. The Department states that parents specifically do not benefit from their child- their children getting a college degree. I argue they do. If they are a first-generation college student, you have opened your family to the ability to dream bigger and in some cases, break generational curses. As the Century Foundation noted in one of their most recent reports, Parent PLUS poses a dilemma for Black and Latino families in particular, who may view higher education as one of the only available opportunities to ensure that their children- that their child achieves upward mobility. Additionally, many Parent PLUS Loan borrowers assume that their kids will be able to help them pay for their Parent PLUS Loans.

MS. JEFFRIES:

30 seconds, Jordan.

MR. NELLUMS:

I call on the Department to reconsider its previous statements regarding Parent PLUS Loans, and include them in the SAVE Plan and any plans that cancel student loan debt, such as canceling debt of Parent PLUS Loans after parents make payments toward their loans for the amount of years that their students were enrolled in school, as any years beyond when their child was enrolled should be considered as creating hardships. Thank you.

MR. WEATHERS:

Thank you. Jordan. Of note, David Ramirez is going to be coming in sitting at the table in place of primary Ashley Pizzuti for student loan borrowers who attend programs of two years or less. And next, Wisdom.

MR. COLE:

Thank you. I just wanted to share some stories from members of the National Association for the Advancement of Colored People in terms of the hardships that are impacting them. Sheila S. writes, my debt to income ratio is so disproportionate that my risk for homeownership is not likely. Who will give a mortgage to somebody who is nearly 500K in student loan debt? Trina W, owing an amount of student debt is stressful. I'm fearful that my kids may be saddled with my debt when I die. I'm a disabled veteran and I have to keep a job just to pay student loan debt. It's hard. She's saddled with $81,000 in student debt. Valerie P., I'm currently the primary caregiver for my mother and husband, who are both disabled. My husband has been recently diagnosed with lung cancer. I've taken on two jobs in order to make ends meet in the payment for my student loans, which has taken time away from me being able to care for my family. Valerie has 200K in student loans. Miriam B., who has 96K in student loans, I was provided for- I wanted to provide for my family, I did not make sufficient salary and worked two jobs. I was a mother of four children and a grandma. I've been paying my loans, but I was told that my last payment would be when I was 95 years old. I'm 70 years old. Asia M., who has 300K in student loans, I'm unable to launch a real estate business. Although my job pays me a decent salary, I usually live paycheck to paycheck and unable to amass savings. I'm afraid to start trying to have a baby with my husband, because we are burdened by the huge debt and are not financially stable enough. There are a multitude of key issues that are here and hardships that people face, but identifying some of these issues, such as job loss and the reduction of income solutions that the Department can take in terms of cancellation, but also adjustments to IDR that folks have mentioned already. I want to also highlight the health issues that happen with student loans, health problems, medical emergencies can lead to high medical bills and reducing the ability to pay student loans. We know that 53 percent of high debt student loan borrowers have experienced depression because of debt. Nine out of ten borrowers experienced significant anxiety due to their student loan debt. 1 in 15 student loan borrowers surveyed have said they've considered suicide due to their student loan debt. The Department can take action to explore medical hardship deferment and specialized loan forgiveness programs for borrowers facing these health related financial difficulties. Also, identifying public service and nonprofit- Borrowers working in public service or nonprofit sectors may face lower salaries compared to their student loan debt. The Department can expand Public Service Loan Forgiveness programs by lowering the required number of quant- of qualifying payments and simplifying the forgiveness process, encouraging more borrowers to pursue careers in these sectors. Thank you.

MR. WEATHERS:

Thank you, Wisdom. Next, Scott Buchanan.

MR. BUCHANAN:

Yes, we're talking about other sort of discrete populations that are experiencing hardship. And while this isn't a big population, it's one that we've talked with the Department with about for many years is for borrowers who are reported as missing persons. We don't have consistent guidance on how to treat these loans across loan programs, and the ongoing outreach to service or recover on those loans creates a lot of pain for families who are already going through a terrible issue of having someone in their family who is a missing person, and I think it would be important for the Department to consider and regulation clarifying practices, and also to determine when we decide to cancel these loans so that we're no longer pursuing loans and creating that distress for families on an ongoing fashion.

MR. WEATHERS:

Thank you. Scott. Next, Scott Waterman.

MR. WATERMAN:

Good afternoon. I wanted to provide a little context for discharging student loans, because we do it all the time in bankruptcy. And in the bankruptcy world, in order to discharge a student loan, the debtor needs to demonstrate three things. Number one, that they've acted in good faith. Number two, that they have a current hardship. And number three, that the hardship is going to continue through a substantial period of the repayment period for that loan. Now, recently, last year, November of 2022, the Department of Justice tried to standardize that attest. It's called the Bruner test and issued a new directive. And I think we can learn from that because that new directive establishes certain standards and presumptions. And one presumption is if the debtor is having a hardship and is older than the age of 65, then there's a presumption that that hardship is going to continue so that that can be discharged. The second presumption is that the debtor has been unemployed for five of the last ten years. They meet that presumption. And so, I ask that perhaps the Department can look at its- the Department of Justice's guidelines and use them as a basis for their decision to make it easier for people to discharge loans short of having to go to bankruptcy. Thank you.

MR. WEATHERS:

Thank you, Scott. Next, Jalil.

DR. BISHOP:

Thank you. I want to underscore again thinking- having the expansive view and expansive definitions of hardship, I think many of my fellow negotiators have shared great categories for us to think about. I think that it's particularly important for us to return back to the conversation of Parent PLUS borrowers, because I think that there's a- I'll say, Parent PLUS borrowers and graduate school borrowers. I think there's an argument that I can see continuously from the Department that there's a risk of a moral hazard if we offer benefits to these two groups, because there's a notion that these two groups, knew the loans that they were taking out should have the means to handle the risk that by somehow offering them benefits that can handle the real hardship that they're experiencing, that that somehow would create a moral hazard where they would borrow more loans than they need and I would really encourage the Department as you're hearing these stories being shared here today, as you're looking at the data, to really consider some of the moral hazard arguments that have been used to exclude, particularly Parent PLUS borrowers from past beneficial plans as we look forward at additional regulation. I also think that data is important here, but it's hard to capture hardship stories if you're only looking at quantitative outcome data. So, I would encourage the Department to look at research such as mine, the National Black Student Loan Study, where we actually captured the experiences of 2000 Black borrowers and will share the data report and the data hub where you can not only read the stories, you can listen to the audio, you can see the visualization of how these hardships are playing out when it comes to meeting people's basic needs. And then I will also put in a data request for the Department to please submit to us some themes that you're receiving in the 27,000 comments that you have received around hardship that borrowers are experiencing. So, you're already receiving a lot of this qualitative data. If you could pull out some of those hardship themes, that would also help us as we're trying to define hardship categories.

MR. WEATHERS:

Thank you very much. Quick note, India Heckstall will be replacing Wisdom Cole at the table for the Civil Rights Organizations constituency. Next, Jessica.

MS. RANUCCI:

Thank you. I won't belabor it, but I just want to repeat what people said about Parent PLUS borrowers. It's a real problem and people are really struggling. I was at a- recently at a training for a student loan advocate non-attorney advocates, financial counselors essentially. And the trainer said, look, if you can't afford your Parent PLUS Loans like the worst case is you try and pay them until you die. The best case is you try and pay until you get disabled enough to get a discharge, and I think that that really reflects how people are feeling about Parent PLUS Loans is that it's a hole that they just literally will never get out of. So, I think it's really important that those are included in any kind of relief. And then I just wanted to bring up a topic that I referred to, but think is very important in terms of the hardship here. I think the Department is well aware of the student loan scammer- student loan document preparation companies, which are private companies that solicit payments from Federal Student Loan borrowers in exchange often for false promises about loan cancellation or loan forgiveness. In reality, they just do a simple IDR application or a simple consolidation, even often when consolidation or IDR consolidation really is against the borrower's best interest. There are thousands, probably in the hundreds of thousands, definitely in the tens of thousands of borrowers who've been enrolled in these companies. The FTC and many state attorneys general, including Yael's office, have taken action against them. But this is a widespread problem, and I think really a basis for hardship. If you think about the millions of dollars that have poured into this industry, that's really money that should have gone to pay borrowers' principal and interest. And I've had individual clients, for example, who believed that they were paying their Federal Student Loans, in fact, were paying, a private third-party company that was misrepresenting its role and in one circumstance even tried to do an objection to administrative wage garnishment. The borrower did not understand that they were in default because they believed they had been paying their loans. So, I think this problem is really pervasive and a real hardship for many people that I hope the Department considers as a basis.

MR. WEATHERS:

Thank you, Jessica. Next, Amber.

MS. GALLUP:

Hi. Yeah. You know, as a state official in New Mexico, and, you know, we're talking about, you know, borrowers, special populations with special hardships, I want to make sure that we mention, you know, New Mexico is home to 23 tribes in pueblos. You know, loans in these vast rural areas of our state are, you know, among the only opportunities that native and rural students have to finance their education. I know from personal experience that, you know, that the private lenders that Jessica was just talking about also have a presence in the rural areas and in the tribes in pueblos in New Mexico. And, you know, borrowers from Native American communities. One thing that's special about them is that they often are committed to staying within their communities, to giving back, to serving their communities, and investing back in their communities. And I think that, you know, that benefits all of us. It benefits the state. It definitely benefits the tribes in pueblos. And I think, you know, that really could absolutely be said of our large Hispanic population as well in New Mexico. Now, you know, I think it's easy to understand that the earning potential in our vast rural spaces and our tribes in pueblos in New Mexico, you know, is- can be low, and access to information because of the lack of resources in our state is a real issue, even coming from the state itself. So that- you know, that I think that this situation in a whole leads to a situation that really further compounds the historic harms that our Native American and Hispanic and really rural communities are already facing in New Mexico and really holds them back from investing in themselves and their children. So, I want to make sure that the needs of this particular group are also, you know, kept in the foreground of the Department’s understanding.

MR. WEATHERS:

Thank you. Amber. Next up, David Ramirez.

MR. RAMIREZ:

Hi, everyone. I really want to concur all the statements about student- or Parent PLUS Loans and myself as a student, I recently had to take out loans, find myself very challenged in trying to understand the differences in benefits between unsubsidized Federal loans and Parent PLUS Loans, and had no real way to understand those differences. And relying on financial aid offices, even at an institution like UCLA, is very unreliable and very difficult, especially for first-generation students of immigrants. I also really wanted to elevate for you all the second-generation immigrant students and those of children of undocumented immigrants, particularly since they don't even have access to Parent PLUS Loans. As a particular hardship that borrowers experience. You know, the immigrant experience in America is trauma itself. And the added trauma of trying to navigate higher education and trying to navigate how to finance your education, is disproportionate for those students. And so, I just wanted to offer that.

MR. WEATHERS:

Thank you, David. A couple quick notes. Lane Thompson is coming back to the table in place of Amber Gallup. And Richard Haase is coming back to the table for Jalil Mustaffa Bishop. Next up, John Whitelaw.

MR. WHITELAW:

Yes. Thank you. I want to make a couple of points. One is sort of technical, but I think important. Remember, the standard for bankruptcy is undue hardship. And the standard here is a significantly less stringent test of hardship. So it seems to me anything that qualifies in bankruptcy automatically covers- qualifies as hardship.

But it's a one-way ratchet in the sense that just because it doesn't qualify for bankruptcy does not mean it wouldn't be a hardship. I also want to take a little detour, I think not quite as important as the substantive standards for hardship, and I know I'm going to sound like a broken record on this, automation, automation, automation. It doesn't matter what the standards are if people have to suffer a difficult application process, they will not be able to navigate it. And that is particularly true for individuals with disabilities. I have spent much of my career doing a- working with individuals with disabilities who try to get waivers of Social Security overpayments, and one of the tests to get a waiver is to show financial hardship. And I cannot tell you the volumes of people who cannot navigate that process, regardless of their substantive eligibility. So it is just, if not more important, to make sure that the- that you look for markers of hardship. I can give you one example. On Medicare and not subject to the enhanced Medicare premium because you are subject to IRMAA. So everyone on Medicare is either going to be elderly or disabled. And I think that's a- that is again, just I was thinking of things off the top of my head for what can we use for indicators of hardship. And then there are ways that at the quote top end, if there are some people that we think, yeah, this person is on Medicare, but they but they've got millions of dollars, they shouldn't be subject to hardship. There are ways to tinker with that at the back end, but that is not a difficult way to use as a simple mechanism for identifying people who are absolutely going to be undergoing some hardship. And I think there are lots of creative markers that we can use, by no means exclusively, but many markers that we could use to indicate for hardship. Receipt- and these are not exclusive, but receipt of any type of public assistance; Medicaid, SNAP, food stamps, any of those should be automatic indicators of hardship. And that is information that can be readily obtained through data exchanges that exist.

MS. JEFFRIES:

30 seconds, John.

MR. WHITELAW:

And so I think we want a broad, expansive look. And then you really have to spend a lot of focus on looking for readily identifiable markers that people do not have to fill out applications for. Thank you.

MR. WEATHERS:

Thank you, John. Next is Richard.

MR. HAASE:

I'm glad John just brought up the importance of automation, which we hadn't really been talking about much today. It's actually what I wanted to chime in on also. I think it's important to remember that when it comes to hardship, it's often going to be people who are working multiple jobs who are- you know, we talk about discretionary income, but we don't always talk about discretionary time, discretionary faculties, language barriers. You know, having grown up in a single-parent home with a parent who worked three jobs and disabled brother, living in poverty, I can tell you that, you know, my home, you know, and my family were probably ones who would have missed opportunities that we weren't geared towards and supported through navigating. So I think it's sometimes mistakenly people blame others for which paths they don't pursue towards achieving forgiveness and support, and I think it's important that we remember that it's often that people who need our help the most, who we really have to make a conscious effort to reach out to and find. The more we can do to automate the process so families like those, you know, can get the support they need. I think that's going to go a real distance when it comes to addressing that hardship.

MR. WEATHERS:

Thank you. Lane, you're next.

MS. THOMPSON:

Thanks. I have also been thinking about which kind of categories of borrowers are easily identifiable, and one that comes to mind for me is people without a permanent address. So people who are experiencing houselessness. In a lot of cases, these are also people who are defaulted, people who have not connected with their servicer in a long time. So I think there's a few different metrics there; address, most recent contact with servicer, and length of default that could all be pretty clear indications of hardship.

MR. WEATHERS:

Thank you, Lane. Jessica, you're next.

MS. RANUCCI:

I just wanted to echo John and Richard that I think largely the negotiators I believe are on the same page here, that we think that the more that can be automated, the better, and that the Department should largely be focusing on areas in which it can use its understanding of hardships experienced by borrowers to enact waiver of debt automatically without an application. But I do think that this really should be two-track and encourage the Department with that as the primary goal, to also, especially when we're thinking about the long-term effect of these regulations, have as a secondary measure in the long run, an ability for borrowers to affirmatively apply for hardship relief in circumstances that may not be captured by those automatic programs. And I just- I don't think that should be the major focus, but I don't want it to get lost. And I hope that the Department is able to come up with a proposal that has both.

MR. WEATHERS:

Thank you, Jessica. A couple quick notes. Ashley is coming back to the table, as is Jalil. Thank you. Next, Kyra.

MS. TAYLOR:

Thank you. I also want to flag another form of hardship. So oftentimes we- the clients of legal aid organizations have different family compositions. And so you may have multiple adults contributing income to the family. Even if the borrower doesn't lose their job, if a family member that is contributing family income loses their job, that can pose significant financial hardship on the borrower and complicate their ability to pay for their student loans. In addition, I wanted to raise up that military spouses often struggle with paying their student loan debt. In a recent survey done by Blue Star Families, 34 percent of the active duty families reported that they had student loan debt, and of that 34 percent, 80 percent owed $10,000 or more. Military spouses have higher rates of unemployment and may have more frequent periods of unemployment over a period of time just because they're moving as their duty station changes. And so I would ask the Department consider that population as well. Unlike active duty members, the military spouse may not be eligible for things like Public Service Loan Forgiveness. In addition, while some of the things I've suggested may not- may be very difficult to automate, there are ways of simplifying the form that borrowers need to use to be eligible- to demonstrate that they're eligible for hardship. I think a great example of this was President Biden's previous broad-based cancellation form. It was easy to understand, it was fast to use. And so, I would ask that the Department model, whatever it ultimately creates after a form like that. In addition, the form was easy to understand and employed plain language principles and I think that is especially important here for any application that the Department is creating.

MR. WEATHERS:

Thank you. Next, Sher.

MS. GAMMAGE:

I don't want to belabor any points that already have been made, especially concerning the buckets of borrowers or the groups who make- have undue hardship. But I'd like to go back to this issue of Parent PLUS and graduate workers, and also couch it within the mental health or the quality of life and the moral hardship argument that Jalil brought up. And I'm going to use myself as an example. And some people in my constituency, which are four-year borrowers. Many parents later in life have taken out loans to help their kids go back to school. One of the negotiators brought up the fact that his father won't pay off the loan, pay off- or pay off a loan until he's 84 years old. Amongst that group is an aging population. And we have to- though the Department considers permanent disability as a hardship, it doesn't count things like chronic illness. For myself, I went back to school- to graduate school in my 50s. Shortly after doing so, I came- I encountered a life threatening illness that threw me into deferment, though I still suffer with that illness. I have stage four nonalcoholic liver disease, and I also have chronic pancreatitis. I'm on- I'm not on a transplant list for my liver yet, but I do have a MELD score. I am now approaching 66 years of age, still paying loans, and it doesn't seem to me that the

Department will reasonably be able to collect my loan in my lifetime, however long or short that may be. And that for other parents who have taken out loans for their children, who have had kids later in life and are taking out loans, they're not going to reasonably connect. So, I would like for us to consider not only permanent disability but chronic illness, because as people age, they do encounter chronic illnesses that not only preclude their ability to work fully pay off their loans, but in order even to support their families. And going into your senior years with this burden hanging over you, someone brought up suicide. I've heard people said, you know, it'd be better for me to be dead. You know, I'm never going to get this around my neck. So, we consider these things- Yeah, we consider chronic illness as one of those groups of borrowers who are experiencing hardship. Thank you.

MR. WEATHERS:

Thank you, Sher. John, you're next.

MR. WHITELAW:

Just two specific examples that I wanted to give. Well, one comment and one example. Ms. Gammage is an example for herself. For example, she's over 65. She's almost certainly on Medicare. That would be a- and she's almost certainly not paying the Medicare penalty- premium penalty, just the regular amount. That would be an easy one. I also think it's important that people should not have to prostrate themselves before the Department to get hardship. But making people beg is unseemly and I think they should not have to give up. It should be easy and quick. And then let me just give one other example. I do a lot of healthcare work. People who receive Obamacare with a subsidy. The subsidy for Obamacare goes up to 400 percent of poverty, which again, this is not an exclusive list, but it then- you know, anyone who's getting Obamacare with a subsidy, that's an indication of economic hardship. I think that's a quick and easy one. Should be available through data sharing, does not require a lot of intrusive questions, does not require people to, you know, sort of, reveal lots of private information they may not want to reveal. I think we want lots of little- bigger and little examples that we- that can be automated. Again, I'm just going to say it again that the Department can find the data on without having- without people actually having to come forward with it. And I think part of it is creatively thinking about relevant databases that we can use as shorthand for hardship.

MR. WEATHERS:

Thank you, John. Next, you're up, Jalil.

DR. BISHOP:

Thank you. I think that is important for us to also be clear that hardship shouldn't only be defined in really particular ways. If we're thinking about what are ways to deliver relief that's automatic, that's including as many- catching as many borrowers as possible who are experiencing hardship. I think that we also need to bring it back down to the basics and to the data that we know that Department has. So again, if we have borrowers who have been in repayment for ten years and they have- you know, spent a large portion of those years in default with zero or no principal-bearing payments, then those are other indicators for us to say that we are dealing with a borrower who's in default- I mean who's in hardship, and those are simple, ready to go data points that can allow the Department to have a broad approach to hardship and again, not burden student loan borrowers with having to prove or just share the pain, rehearse that pain of not only the hardship of living with student debt, but also the hardship of dealing with the Department of ED and loan servicers who just simply, over decades now, have- haven't always delivered accurate information, has- have changed programs so many times, have presented confusing information, have made people go through multiyear processes only to be denied because of tiny mistakes in paperwork or sometimes denials, without any indication why they were denied. I think that some of this hardship is also inflicted by just past servicing and past processes, and it's important to keep it simple, keep it broad and keep it automated. And again, if someone's been paying on debt or have been in repayment for again, I would say ten years or more, I think that's a hardship indicator that should make them eligible for relief.

MR. WEATHERS:

Thank you, sir. Ashley, you are next.

MS. PIZZUTI:

Through organized efforts, there have been over 30,000 student debtors that have submitted a demand letter to the Department to use the compromise, settle, waive and release authority under the Higher Education Act. I am wondering if the Department is considering these under this regulation or under this neg reg and what exactly they are doing for these letters. I know that hearing some of the stories and, you know, undue hardship, with Biden's 1020 plan, there were a lot of people who made financial decisions based off the fact that they received a letter approving them for that forgiveness. I know we can't go back and change the Supreme Court's decision. But there is a considerable amount of people who switched jobs, who left abusive relationships, who had medical procedures they had put off because they had the idea that they would have these loans forgiven. So, I think that there are a group of people who have now kind of backed themselves into a corner, assuming that they would not have these loans hanging over them.

MR. WEATHERS:

Thank you, Ashley. As a quick point, Sarah Butts will be coming to the table in place of Sherrie Gammage. Ms. Taylor?

MS. TAYLOR:

I'd also like to note that many of the things that we've talked about so far, medical debt, chronic illness, housing cost, differences in regional expenses, staying in repayment for longer than ten years, all of these things could be indicators of a borrower's inability to repay the debt in full, or that the fact that the Department is going to be unable to collect the debt in full within a reasonable timeframe, even by use of its collection powers. And so all of these things indicate- may indicate that the Department may struggle to collect this debt in the first place as well.

MR. WEATHERS:

[Inaudible] other hands. Anything else to add to this discussion? Sarah, go ahead.

MS. BUTTS:

This has been a really interesting discussion, and we appreciate you all asking us about what the hardships that we're hearing about and that we've experienced are, so thank you. I think it would be great if the Department could really do an analysis of the data available to see, you know, what are the trends? Are there- are we looking at borrowers over the lifespan? What does that tell us? What different types of occupations are associated with hardship in terms of how long it takes to pay back some of these loans and use that information so that we're really being data driven in our in our way of trying to address some of the challenges that we're facing.

MR. WEATHERS:

Thank you, Sarah. Lane, you're next.

MS. THOMPSON: T

his is a little bit out there, but something I think about a lot is the difference between income and wealth. And there are Income Driven Repayment plans, but there are not wealth driven repayment plans. So I think, you know, another thing to think about is family net worth. You know, we look at that at the front end when we're looking for that expected family contribution. And so I think that might be another thing to kind of keep in mind is that sometimes the- just the salary on paper isn't a good indication of what's being paid for with that salary. What other assets and debts are there? So just kind of throwing out that income and wealth are not the same thing. And that just because somebody has a pretty solid income doesn't mean that they're in the same position as anyone else with that same income.

MR. WEATHERS:

Thank you, Lane. Jessica.

MS. RANUCCI:

Thanks. I- you know, I think you can hear from the table that this is something that we feel very strongly about and I think people have given lots of good examples. But I guess maybe I would ask the Department whether there's anything more specific that you would like to maybe ask the table with respect to the use of the waiver authority here. Is there any- is there anything else more concrete that we can provide you today during this session about this question?

MS. ABERNATHY:

John, are you okay with me chiming in?

MR. WEATHERS:

Please do, Tamy.

MS. ABERNATHY:

Thanks. Jessica, thank you for asking and for prompting us. This really is an informational session. We did not come to the table with proposed regulatory text, which is sometimes typical of a first negotiation. We come to the table with some ideas of things that we're going to do. We did not do that. What we tried to do was really engage in conversation with you guys and solicit your opinion and your insight from the constituents that you represent, for us to have a good faith negotiation and take what you are giving us now, circling back before the second session, providing proposed regulatory language for us to consider and continue our conversations. We're not purposely being vague or evasive. The- many of the things that you're asking us are things we cannot respond to immediately. We need to go back. We need to look at the data. We need to be able to analyze what you're asking and discuss it as a group. So we plan to do that. We plan to come back with more information for the second session. But this- these two days are about us listening to you. You represent a number of individuals in all of the different categories. And I'm listening. This conversation specifically about hardship, it is hard to hear what our borrowers are facing, and we are not unsensitive or insensitive to caring about all of the obstacles and where we can find ways to streamline and automate and provide the Secretary of the authority to make great decisions for these borrowers in these respective categories, we want to do that, and we are looking to you to help us do that throughout the rest of this negotiated rulemaking, two months, two extra months. So no, we don't have a whole lot to say right now, but to encourage us to continue the conversation, because through this conversation, we learn and we're able to adapt and create something that we can present to the table during the second round of negotiations.

MR. WEATHERS: Thank you, Tamy. Any other additional discussion on this issue question? Jalil, please.

DR. BISHOP: Can I just get clarification on- because I understand this is a listening- primarily the goal is to listen to us as negotiators, but I think as we're all preparing for the future sessions and trying to make sense of this session now, it will also help us just to get a little bit more framing, if that's, you know, framing around what are questions or still ideas out there that you would like to hear from us on. If they're- if it's framing around, you know, what are- where are areas where we may need to spend some more time discussing today. But I think just to make sure that we're taking- making best use of this, the

Department doesn't need to share a proposal, but it would be helpful if the Department could share, where could be some more value at? Where could be some more clarification? Where could there be some more discussion? So, I do want to just push back a little bit that if this is just a listening session, then we're not, you know, getting the chance to hear from the Department on what you need so that you can prepare for the next session. So just want to nudge you there more for us to get a little bit more detailed clarification, framing, something if this indeed is supposed to be, you know, a conversation between a negotiation- negotiators and the Department.

MR. WEATHERS:

[Inaudible] Jalil.

MS. ABERNATHY:

What we'd like to do is, we'd like to take a break and we'd like to circle back to answer that question after we've had a break.

MR. WEATHERS:

And I was endeavoring to give us a break, probably in the next ten minutes or so. I see there's still some hands up. Why don't we go ahead and proceed with those?

MS. JEFFRIES:

John.

MR. WEATHERS:

Yeah?

MS. JEFFRIES:

Let me interject. Let's take a listing of the people who have their hands up and go ahead and honor the Department's request for a break.

MR. WEATHERS:

Okay. Yeah. Absolutely. Ashley and Sarah, I've got you.

MS. ABERNATHY:

We would [inaudible] please.

MR. WEATHERS:

30 minutes. Alright. So, let's call it 2:30. Hello, everyone. Thank you for coming back in a timely fashion. A couple quick things I wanted to cover. Just a reiteration that these first two days are for the purpose of the Department in taking information from the negotiators so that they can be responsive. And that's what we're here to do today. I also wanted to reiterate the idea that the comments that we're making are new, that we're trying to explore different and new space from what we've already covered. So, if we could keep

that in mind. A quick note before I move to Ashley and Sarah. Jada Sanford is coming back to the table in place of Jordan Nellums for currently enrolled postsecondary education students. Thank you. Alright, Ashley, take it away.

MS. PIZZUTI:

I'm not sure if the Department could answer this right now, but do we have a timeframe for when these releases or waivers are going to be rolling out? We are going into a very contentious election year, which may not actually work in our- in a lot of ours favor, which kind of seems almost pointless if this is going to be pushed- if this cancellation is going to be pushed into, you know, 2025. I know that there are a lot of people who are, very upset that they didn't get the Biden forgiveness. And it is very- it's turned them off to voting, which I'm, you know, terrified of. And so, I'm kind of wondering, you know, where the Department stands as far as timeline goes and how quickly they are willing to act on rolling some of these initiatives out.

MR. WEATHERS: [Inaudible] I see you've raised your hand. So go ahead.

MS. ABERNATHY: Did you say me, John?

MR. WEATHERS: Yes, I did.

MS. ABERNATHY: Oh, sorry. So typically, we're held to a master calendar schedule, which means if we publish the notice of proposed rulemaking by November 1st, that-which will not be this year, so it'd be November 1st, 2024, then we would have those rules implemented by July 1, 2025, unless the Secretary exercised his authority for early implementation. And when we would craft the notice of final rule, we would include an implementation schedule at that time.

MR. WEATHERS:

Thank you, Tamy. Alright, Sarah, you're next.

MS. BUTTS:

Thank you. This is a comment and follow-up from our last discussion regarding hardship. The Department might look at individual borrowers who have a history of having certified their employment for public service and now find themselves employed in a job where they no longer qualify. This is a story that we've heard repeatedly over the last couple of years, and that I wanted to lift up for consideration that maybe there would be a way to provide some student loan relief for that cohort of folks.

MR. WEATHERS:

Sarah, appreciate that. Ms. Taylor, you're next.

MS. TAYLOR:

This is a follow up question for Tamy. So, the SAVE IDR rule was not subject to the master calendar. Why is the- this relief regulation, whatever shape it takes, subject to the master calendar?

MS. ABERNATHY:

It was subject to the master calendar because we published before November 1st, and then we early implemented provisions. So, the full IDR, the way we're going to implement this, everything that we are working in, that was an early implemented- so there was a staged implementation, so to speak. We did early implementation on five components. Then we did- we're going to do another early implementation when the Department is ready to implement that provision. And then the rest of the rule must be implemented by July 1, 2024. So, we did adhere to the master calendar, it's just we exercised the authority on a number of provisions to early implement. Does that make sense?

MR. WEATHERS:

Thank you, Tamy. Wisdom?

MR. COLE:

I just wanted to bring up another point in relationship to the last question around hardship, particularly around middle class borrowers, since we do not have a seat for middle class borrowers here in negotiations. Definitely want to bring up a point that middle class borrowers may face hardships even though they might have higher wages and face long-term harm because of their loans. We have reports that say that since 2005, homeownership among recent college graduates have declined by 1.8 percent for every $1,000 of student loan debt. 51 percent of renters say the student loans keep them from buying homes, 29 percent of student loan debt holders say that debt has kept them from homeownership. And we know that homeownership in America is one of the best ways to enter into this economic system. And so that's a point that we need to make sure we also hone in on, in terms of how we are alleviating that burden for folks in the middle class.

MR. WEATHERS:

Thank you, Wisdom. I see that Sher is coming back at the- to the table for student loan borrowers who attended four-year programs. I see that we have run the allotted time that we had considered for this question. I handed off to the Department- I know that we were thinking about either circling back to consider questions from yesterday in light of the comments that Mr. Miller made earlier today or any other possible avenue. So, I ask you, Tamy.

MS. ABERNATHY:

Thank you, John.

MR. WEATHERS:

Yeah.

MS. ABERNATHY:

We would like to take a couple more minutes to go back to questions that we addressed yesterday to see if there was anything. Because we had some additional framing today, we wanted to make sure that we had all of your concerns and your observations addressed, or listened to them. We know that this type of session can be kind of frustrating, where we're sitting at the table and we're exchanging ideas and you're giving us input. It's necessary for us to get this right. So as frustrating as it is, this has been so super helpful for us. We are in a much better position going into our next steps. And I'll explain what those are a little bit later. And if we're lucky enough to be able to really narrow down some of the regulatory texts and be able to exercise early implementation, we're willing to do that as well. But I'd like for us to take a few minutes to go back to those questions, and if there are any comments or concerns that you guys have in light of what we've heard from Ben earlier today, let's go ahead and talk those through. And then I can kind of prepare us for what-what's to come between now and the next session.

MR. WEATHERS:

Just a reminder that any questions you may have will be viewed in the chat section. So, thank you very much. Lane, I see your hand. Please go ahead.

MS. THOMPSON:

Yeah. Thank you. I just wanted to make a quick clarification about a point I made yesterday. So, I was talking about hanging loans and how those are often left after Public Service Loan Forgiveness or the IDR account adjustment. And I just want to clarify that I'm not suggesting changing PSLF in that case. What I'm suggesting is going to accounts that had already gotten PSLF and forgiving any remaining balance. So just to kind of make that clarification, thank you.

MR. WEATHERS:

Thank you, Lane. Appreciate that. Scott Buchanan.

MR. BUCHANAN:

If I can get myself off mute. So, since it sounds like we're talking sort of holistically about things that were talked about yesterday and today, I think, you know, the Department has heard a lot of the concerns about sort of borrower issues, sort of disparate impact on minorities and others. And, you know, perhaps, you know, topics like Parent PLUS Loans and over lending in that space. I think those are issues that hopefully, as you're looking through the rulemaking process, you'll find ways to address and find targeted solutions for those things. But I think it's also important, as we look at getting proposals from the Department, that the Department be really transparent as it drafts those things about the strength of the legal justification here. We can't go down the path again about making promises to borrowers that can't be kept, like in past debt relief proposals. We've heard from our end that anger and frustration very loudly. Courts have weighed in on waiver authority, and we have elected officials like Senator Grassley and Cornyn sending the Secretary letters on questioning this legal authority and the Department must really ensure that any regulation can withstand that legal scrutiny. If regs get produced that don't survive, then we're going to further erode the trust of borrowers in the system. And we're really focused, you know, since it's our world of operational issues on how to make these regs replicable, sustainable, and consistent so they can be easily explained to borrowers, like we've had these one-time fixes and they can help, but they're not a real solution for future borrowers. And today's one-time relief programs have taken months, and some may take years to deliver on and are completely confusing, frankly. So, if we pass regulations and cannot get it to borrowers in a timely fashion because there are planning or resource constraints, we also need to be able to explain it, then we will continue to have the underlying problem of borrowers feeling like the system is failing. So, I hope the Department will take that into consideration as it drafts some proposals for this committee to review and provide detailed feedback on in the future.

MR. WEATHERS:

Thank you, Scott. [Inaudible]

MS. SHAVIT:

Thank you. I also want to echo what Lane just said, and note in the context of the discussion that we had today that were raised yesterday, borrowers who had been steered into- or rather, borrowers who would have been eligible for forgiveness under the limited PSLF waiver and would have been eligible for forgiveness in light of the IDR adjustment, but were not able to take advantage of that because they got misinformation about consolidation, misinformation that we're all very well aware of that is pervasive and well documented, that those are categories of individuals who've already been determined to be eligible, ultimately because of characteristics of their loans and of their circumstances for forgiveness and who need it. And that this is an opportunity to identify a discrete cohort of individuals that can be assisted fairly easily. And again, though, I've used the terms PSLF and IDR here, that we're not talking about making changes to the programs themselves, but rather identifying easily ascertainable cohorts that have demonstrated an entitlement to relief and a need for it, and whose circumstances have stopped them from accessing that relief through no fault of their own. Thank you.

MR. WEATHERS:

Thank you, Wisdom.

MR. COLE:

This is a quick process question. I know there have been multiple documents, research reports, links dropped in the chat here. If we are submitting that, I know that there was an ask to submit these via Word doc. Is that correct? And I would just send that to you, Cindy?

MR. WEATHERS:

Please send that to anyone on the FMCS team or all of us, and we'll forward to the appropriate people. And we were asking that it be sent in Word form, yes.

MR. COLE: So, link that we have from Active site, having that in like Word format would be the best practice, correct?

MS. JEFFRIES: Let me just say this. If it is the intent- if you're submitting something with the intent that it be posted on the Department's website, it does need to be in Word format, including source documents, because these documents have to be in compliance with many regulations prior to the ability to post them. And that is an easier lift for those who have to review them for compliance if they are in Word, including source documents. Excuse me. Then, prior to being posted, they would be re- they would be converted into a PDF for posting. So, if these links in the chat are just for anyone who wants to take a look at them for informational purposes and don't have the intent to have them posted, then that is fine, but you are 100 percent correct with anything that you submit for posting needs to come through the FMCS team in Word format.

MR. COLE:

Thank you.

MR. WEATHERS:

Any other questions as it relates to question one and two that we covered yesterday in light of Mr. Miller's comments earlier today? Jessica.

MS. RANUCCI:

Would it be possible to do a very quick caucus?

MR. WEATHERS:

Sure. Who are you looking to caucus with?

MS. RANUCCI:

I think the Department servicers- the servicers seats, Civil rights state AGS states. And Cher in particular. I want to talk about FFEL. So, I think any of the borrower seats that particularly have to do with FFEL. And then I think that the people I named are the seats that have [inaudible]

MR. WEATHERS:

Jessica, how long are you looking for?

MS. RANUCCI:

Ten minutes.

MR. WEATHERS:

Okay.

MS. RANUCCI:

Is that alright?

MS. JEFFRIES:

John?

MR. WEATHERS:

Yeah. Go ahead, Cindy.

MS. JEFFRIES:

Let me help you with- help out here because this hasn't come up. Okay. Jessica, did you say you'd like to have the Department in there?

MS. RANUCCI:

Yes.

MS. JEFFRIES:

Okay. Is the Department willing to participate in that caucus?

MS. RANUCCI:

I also realized I might have left out legal aids. If I didn't say that, I meant to.

MS. ABERNATHY:

We are. However, there is a concern of having ten minutes for that caucus and us having the ability to wrap up our thoughts for the day before public comment. So, while we are certainly- we certainly want to definitely caucus with you, we do have some wrap-up comments, basically kind of a roadmap of what we're going to be able to provide to you and what we're hoping that you'll give to us by the next meeting.

MS. RANUCCI:

[Inaudible] we just get any- if there are any-

MS. ABERNATHY:

I'm sorry.

MS. RANUCCI:

Don't we have 45 minutes left?

MS. ABERNATHY:

We do. I don't know how to tell time apparently. You know, it's been a long day. I'm thinking 3:00 in my brain.

MS. JEFFRIES:

Okay. No worries. So, Jessica. And for the rest of you, this is how it needs to work as far as setting up these caucus rooms. Mike, can you give me a hand and pull up a breakout room? Jessica, I'm going to ask you to identify the persons by name that you would like to go into that caucus room, and then once that is completed, we will go off live stream and the discussion at the table will stop until the caucus is over. Okay, so Jessica help us out here and give us the names of the negotiators and Department that you want to participate.

MS. RANUCCI:

Sure. I'll do the best I can. Scott Buchanan and Ben Lee from servicers. Yael from state AGs. Kyra from legal assistance. Sher from the borrowers. Wisdom from civil rights. Lane from states. And the Department staff as you wish. If there's anyone else I've missed, please speak up.

MS. JEFFRIES:

Hey, Tamy, can you tell us who you intend to have in that caucus? Where'd Tamy go?

MR. LAGAARD:

This is Soren. I'm not sure where she went, but for the Department, could you make- could you make sure you have Tamy, of course her, me, Ben Miller should be on here, and Toby Merrill.

MS. JEFFRIES:

Okay.

MS. BUTTS:

Sarah Butts has asked, are the alternates joining as well?

MS. JEFFRIES:

Only the people whose names have been listed.

MR. WHITELAW:

Can you add me, Jessica?

MS. RANUCCI:

Sure, John. I'm not meaning to be exclusive.

MR. WHITELAW:

No, no, no, no, no.

MS. RANUCCI:

[Inaudible] a memory test here.

MR. WEATHERS:

I was not taking it that way. I just wanted to- since we have to- we have to. Yeah. Just add me too, please. Thank you.

MS. RANUCCI:

Yeah. Again, the discussion is FFEL. But I don't necessarily think institutions make a ton of sense, but if you- if-

MS. JEFFRIES:

Okay. So, Mike, did you capture those names?

MR. WEATHERS:

I think so.

MS. JEFFRIES:

I wrote them down.

MR. WEATHERS:

Yeah.

MS. JEFFRIES:

So now that we have that on the record of who will be caucusing, Patrick, we can stop the live stream, please.

MR. WEATHERS:

Welcome back. We've- we're back from our brief caucus. I- what we were doing previously was we were circling back on questions from yesterday in light of the comments that Mr. Miller made this morning. I do see that it is currently 3:03 Eastern Time, so we're 27 minutes away from the beginning of our public comments. I do want to be as productive as possible. So, is that where we want to get back to? Okay. Alright. Does anyone have- again, keeping in mind what we're trying to do is we're trying to circle back on questions one and two from yesterday. In light of the comments that were made earlier today, clarifications from Mr. Miller and adding new texture to the conversation. Alright, Ms. Sanford, go ahead.

MS. SANFORD:

To add something new, I think, to the conversation, it's probably known, but as someone who's currently enrolled and has student loans, like many of my peers, I haven't even begun to have to pay these loans back and to try and navigate these obviously flawed avenues to repayment and just being in school and knowing the anxieties and the impact it has on [inaudible] to see that still, as I go on to like 60, 70 years old, that's still what I have to look forward to. And that's just now having to- being in high school, to college, that's a complete turnoff. It's discouraging. People who want to pursue a degree in higher education, which of course isn't the goal. That's all I wanted to say about that.

MR. WEATHERS:

I do want to make a note that Jalil is back at the table for the student loan borrowers who attended graduate programs. Melissa, you're next.

MS. KUNES:

Thanks, John. I wanted to make a comment about the question yesterday about how we help our borrowers who are in repayment know about some of these loan programs or some of these repayment options that they have access to. And the one item I think that public schools that I'm representing, the two and the four years have struggled with as we have gone into the return to repayment cycle for borrowers who had not been in repayment for the last three years due to the COVID pandemic, is that once our students graduate or leave school and go on to repayment, they sort of become the- they become owned by the servicers and the Department. And while we do have some connection with them through our Alumni Association, with our former students is a little bit different than our active relationship with them while they were enrolled. So, I would like to see a way for the Department to create more of a bridge with schools on how we can understand the communications going to our students post leaving our institutions, and how we can then support the messaging to those students because we want them to know about these provisions. They trust us, the schools, because they've had a relationship with us, and we think we can do more to support the messaging that is being sent to students when they go into the repayment stage of their lives to help them better navigate that path. So, I wanted to throw that out there as a comment and a suggestion to help create that bridge between us, so that we can better help support the communications and our students through a lifetime of being a good repair. Thank you.

MR. WEATHERS:

Thank you, Melissa. Just a point real quick. Benjamin Lee is coming in to the table in replacement of Scott Buchanan. Alright. Any additional comments on questions one and two? Jalil, you're next.

DR. BISHOP:

Thank you. I think a group that we have talked about a little but I want to make sure to uplift and our framing of borrowers who may fit under questions one and two are borrowers who have debt but no credential and I think it's important to expand that group not only for undergraduate borrowers, but also thinking about graduate borrowers who are often left out of that conversation of graduate borrowers who have debt but did not earn a graduate credential, and I think in the Department's own final rulemaking, they shared a table, it was table 2.1 that showed the uptake or the enrollment in IDR plans. And they said that 22 percent of borrowers who did not complete a credential are using IDR plans, which is at a much lower rate than borrowers who do have a credential and think that's something for us to think about and uplift, is the particular hardship experiences of borrowers who have some debt but no credential. And just thinking about even after many different strategies of reaching out to this group, that it still has been a group that the Department and servicers have struggled with servicing and reaching. But we know from data are experiencing often some of the worst outcomes around student loan debt and struggling to repay.

MR. WEATHERS:

Thank you, sir. Okay. Next, I have Lane.

MS. THOMPSON:

I have just been thinking about data sources, and I think that the complaints that FSA Ombuds office receives and that the CFPB receives about student loans is a great place to kind of pick up on patterns around what kind of folks need relief. I have several of my complainants right now who don't agree with the assessment their servicer made, or that the Department made on a relief program application. They've been told to file a complaint with FSA. So, I just kind of think that it's important to remember that we do already have a lot of data around all of this kind of stuff, even almost real-time data, since I collect complaints as part of my job. It's just something I think of, is that there's a lot of really valuable quantitative and qualitative data to be found in that CFPB and FSA Ombuds portal.

MR. WEATHERS:

Thank you, Lane. Angelika, you're next.

MS. WILLIAMS:

Thank you. I just want to- as this may lead to other topics and understanding the alignment with this topic is that we're talking about the current population that is experiencing loan indebtedness, but also the- there's two other areas that should be in conversation as well. And it's also looking at the Federal Aid programs to prevent loan indebtedness. As I mentioned earlier and yesterday, is that, you know, the Pell Grant program has taken a significant decline of covering educational costs since its initial implementation, meaning that it's just going to- this conversation of loan indebtedness is just going to continue until we review the Federal Pell Grant program to see how it's preventing loan indebtedness. The other area I feel like we should be discussing as well is the borrowers who actually paid off their loans, who've already paid off their loans. So, the loans, the loan payments that they made should be reviewed as well as we're talking about relieving others from loan debt.

MR. WEATHERS:

Thank you, Angelika. Anyone else want to comment on our questions from yesterday in light of the clarification earlier this morning from Mr. Miller? Jalil.

DR. BISHOP:

Thank you. Also want to uplift the comment around Pell Grant. So, though the Biden cancellation plan was struck down by the Supreme Court, there was a moment where the

Department really, for, I would argue, the first time used Pell Grant as a way to highlight both the experiences of students who had to take on a Pell, who received a Pell Grant and had to take on student debt, but also their parents. And that seems like that coupling of providing relief both to students and their parents through that, the Pell Grant as an indicator, as a way to do fast and broad cancellation, is a mechanism that would just encourage the Department to think about how to address some of these questions or create some of these buckets as we're moving through future rulemaking, because I think that was an opportunity that I'm assuming was both vetted by the White House and the Department where Pell Grant became a great indicator of how, in that case, to provide up to $20,000 of relief for borrowers and do it in a way that kind of took into account both the borrower and their parents. So just wanted to lift up Pell Grant as another strong indicator that, again, has already been vetted by the Department and the White House.

MR. WEATHERS:

Thank you. Ashley, what would you like to add to the conversation?

MS. PIZZUTI:

I asked this yesterday, both in the chat and as a question, and I'm just wondering if we could get possibly a list from the Department of Social Media avenues that they are using to try to reach some of their borrowers to get in touch with them about their options that are currently the Public Service Loan Forgiveness, Borrower Defense, and the SAVE Plan. I believe someone put in the chat just the generic Instagram account, but I was wondering if the Department had any other accounts that are specific to student borrowing or higher education, and if we could get a list of those and then possibly come up with some ad ideas or some resources that might help with outreach.

MR. WEATHERS:

Thank you, Ashley. If you have not already put that into the chat, I encourage you to do so now. Thank you. Anything else to add on the questions from yesterday? Any additional new comments to make? Anything at all? Alright. It is 3:14. But we want to utilize these 16 minutes to their best use.

MS. ABERNATHY:

John, if it's okay, I'd like to try to do some wrap-up and some framing for our next negotiated rulemaking session and kind of chat a little bit about all that has transpired between the last couple of days. We will give a proposed regulatory text to the negotiators a week before the next rulemaking session. That will represent our position at the time that we give that to you. Taking, of course, into consideration all of our discussions from yesterday and today, it will reflect that position. What we are hoping that we get from you guys is kind of like a little takeaway, maybe a homework assignment. You know, we should all understand homework being that we're in some sort of- the education world. We would like for you to really look at the text; what's working with it, what's not working with it, what your preferences are, the rationale for which you think things need to be changed. Our goal here is for us to reach consensus, and we want to work alongside you and with you for that goal. We also know that there have been numerous data requests and numerous requests for information. The data that's available to us and the resources that are available to us and those that we can share and the questions that we can answer, we will do so to the best of our abilities. It may take us a little bit of time, and those things that we can provide to you will filter through FMCS and they'll circle that back to you guys. But what we really have learned so much from you during these past two days is framing for our thought processes and exploring the different ways that we intend to help borrowers in the circumstances that we've already given you, such as interest, looking at that avenue, looking at the length of time borrowers have been in repayment, looking at gainful employment provisions, looking at hardship, and of course, looking at other ways when borrowers are eligible for things but they haven't quite applied for them. Automation. We heard you loud and clear about automation, and we too want to implement as many things as we possibly can that would allow us to do so and automatically provide benefits to those borrowers. So going forward, in case you have any questions, you know, I would hope that we can, you know, ask them now about what our expectations are for you as negotiators is we're going to provide you with reg text. We're going to provide you with a path of where we think we are based on these conversations and the position of the Department. And we hope that you guys will look through that and provide us with feedback for the next session.

MR. WEATHERS:

Thank you. Tamy. Appreciate that. I'm seeing our waiting room fill up with what I presume are public commenters. Do we want to move towards public comment now?

MS. JEFFRIES:

We're about 15 minutes or about, well, about 23 minutes or 13 minutes ahead of schedule. The first speaker, though, that has a time slot is with us.

MR. WEATHERS:

Anything to add before we move in that direction.

MS. ABERNATHY:

It would be nice if we could just have a five minute break.

MR. WEATHERS:

Sounds great.

MS. ABERNATHY:

Thank you.

MR. WEATHERS:

Alright. Why don't we go ahead and call it a seven-minute break to 3:25? See you all then. We are back and we are ready to begin with public comments. Cindy, who is the first public commenter?

MS. JEFFRIES:

Your first public commenter is Jim Blew of the policy. Jim, can you hear us?

MR. BLEW:

I can, Cindy, how are you?

MS. JEFFRIES:

Okay. Wonderful. I'd like to welcome you to the comment period, and we appreciate you taking the time to join the committee today and address them directly. You will have three minutes to make your comments to the committee. We will give you a 30-second notice of when your time is about to expire, and then we will let you know when your time has expired. So, with that, you are ready to go.

MR. BLEW:

Terrific. Thank you. Good afternoon. My name is Jim Blew. I am the co-founder of the Defense of Freedom Institute. We're known by our acronym, DFI or simply DFI. As a few of you know, I served under Betsy DeVos as the assistant secretary for planning, evaluation and Policy Development, including policy for Federal Student Aid. These sessions seem to be leading inevitably to a rule that will expand the Secretary's power dramatically and perhaps dangerously. The one out of seven Americans who hold student debt seem to be quite well represented by this committee. I don't pretend to speak for the other six out of seven Americans. At this point, we really do not know how voters will react to the administration, adding hundreds of billions of dollars to the Federal debt through loan forgiveness during a time of inflation when Congress is struggling to finance our responsibilities at home and overseas. What we do know is that the Biden administration's approach to student debt has successfully transformed Federal Student Loans into a highly Partisan issue. Perhaps that was inevitable when the government collects loan payments from its own citizens. I hope that the Department will share with the committee some of the letters and comments coming in from Congress. For now, let me specifically point to one addressed to Secretary Cardona from several US senators, led by Finance Chair Chuck Grassley. One passage captures the tone of the letter. We, senators, are gravely concerned that the Department is undertaking a blatant political process with a predetermined outcome. It is unfair to string student loan borrowers along for political purposes. As the undersecretary repeatedly noted in his opening comments, the student loan system is broken. To be clear, opponents to this process are concerned as well, that some borrowers have been harmed by the Federal Student Loan program. But we should be having a conversation about the source of this harm. That, is bad Federal policy and bad management by the US Department and its vendors. Both of these root causes can and should be addressed. This committee, unfortunately, cannot effectively address either one. Congress is not without power in this situation, including its power over the Student Aid admin budget. In fact, the Grassley letter specifically asked the administration to engage in a serious and legal process to fix the law. As the letter concludes, our phones are ready and our doors are open. I hope the administration will embrace that offer. In the meantime, I encourage the committee and the Department-

MS. JEFFRIES:

30 seconds.

MR. BLEW:

-grand gesture- to avoid grand gestures like those that led to a rebuke from the Supreme Court that would only make it harder than ever to genuinely fix our student loan programs. Thank you.

MS. JEFFRIES:

Thank you, Mr. Blew. We appreciate your comments. Okay, John, next you have Kristy Smith from Global Education Consultants.

MR. WEATHERS:

Kristy, can you hear us?

MS. SMITH:

Yes, I can hear you.

MR. WEATHERS:

Thank you for taking this opportunity to speak directly to the negotiators. You have three minutes and you'll have a 30-second warning. Go ahead.

MS. SMITH:

Thank you. My name is Kristy Smith. I am currently an organizational learning analyst at the US Department of State. I'm doing the exact same public service work as my colleagues. But because my status is as a contractor with a different EIN, my work is not being counted as public service. I ask the committee to consider the unfairness of this and to change this policy. But I'm here today to speak about hanging loans. I'm one of at least 79 known public service workers who have PSLF hanging loans. I have certified public service consecutively from 2007 to 2019, 12 years working as a public school teacher and for qualifying nonprofits. When the limited PSLF waiver was announced last year, since my current work didn't qualify, it was the one shot I had to get right. Despite dozens of hours diligently researching how to consolidate my older FFEL loans with my direct loans to maximize forgiveness, I found only conflicting information. It was clear I needed to consolidate my FFEL loans, but information was not provided on how to deal with consolidation for older FFEL loans with direct loans. I called my servicer at the time, Navient, on the day consolidated, and I was misled, being told that there was no benefit, not needed to consolidate my direct loans. I now have the phone recording of this, thanks to working with an FSA ombudsman. Because I was misled, only 3 percent of my loans were discharged. I would have a zero balance today if I had only checked the boxes to consolidate my direct loans with the FFEL loans that day. Let that sink in. Three check boxes cost me nearly $50,000. You can imagine how much sleep I've lost, the huge financial loss for me this has created, and the emotional toll because my case has not been fixed. Under the limited PSLF waiver, it is clear that has not been equitably processed by leaving us with hanging loans, even though we all have at least 120 months of public service employment and student loan payments certified under the waiver. Furthermore, many of us, like myself, have submitted PSLF reconsideration requests which have been denied. And yet a majority of these denials do not address the details and nuances of our cases. FSA is under a legal decree to look carefully and fix PSLF cases like ours under the reconsideration process. The fact FSA is not looking closely at the facts of our cases and fixing them means that FSA is in blatant violation under the law. The Department of Education has been aware of our hanging loans since at least 2022 but has ignored our plight. Now that Federal Student Loan payments are due this month on loans that should have been forgiven under the waiver, we are asking one more time. Please do the right thing and fix them. We are organizing and ready to escalate our cases if they are not fixed. Thank you very much for your time today.

MR. WEATHERS:

Thank you, Kristy. Cindy, who do we have next?

MS. JEFFRIES:

Next we have Kristen Folsom, who is representing herself.

MR. WEATHERS:

Kirsten. Kristen, can you hear me?

MS. FOLSOM:

I can hear you.

MR. WEATHERS:

Thank you for taking the time to do this today. You have three minutes to make your statement. You'll be given a 30-second warning. Go ahead. Thank you.

MS. FOLSOM:

Okay. Good afternoon. My name is Kristen Folsom. I'm a student loan borrower, and initially as an undergraduate borrower, which took me 20 years to pay that loan back. And now as a graduate borrower and also as a Parent PLUS for my daughter, who graduated from college in 2020, I'm currently employed with the Department of Health and Human Services, but I was a government contractor for 16 years. And I'm here to bring attention to this cohort of borrowers who should also be entitled to Public Service Loan Forgiveness. Government contractors, whether at the federal, state or local level. Yes, I understand that the Department of Education cannot change the regulations set forth in CFR 685.219, but the Department should at least assess its interpretation of the regulation, especially the definition of non-government public service, which means services provided by employees of a non-governmental qualified employer where the employer has devoted a majority of its full-time employment- employees to working in at least one of the following areas. Emergency management. Civilian service to military personnel. Military service. Public safety. Law enforcement. Public interest law services. Early childhood education. Public service for individuals with disabilities or the elderly. Public health. Public education. Or public school and library or other school-based services. To further strengthen the argument that the government contractor should be entitled to loan forgiveness, I point to a standard used by the Federal Equal Employment Opportunity Commission, wherein the EEOC considers that government contractors who want to bring a discrimination case against the government can be treated as actual government employees if the agency in question exercises sufficient control over the employee's work activity. There are many standards the EEOC uses engaging the exercise of sufficient control of the contractor's activity, but one of the most prominent is that the government agency in question has the right to control when, where, and how the worker performs the job and whether there is a continuing relationship between the worker and the employer. As government contractors, unfortunately, we are treated as actual employees of the Government, but do not receive the same perks as employees receive. Namely, in this case, the right to Student Loan Forgiveness after ten years of service and payment. In summary, I'm asking the Department of Education to consider government contractors in their assessment of Public Service Loan Forgiveness and to reinterpret - reevaluate its interpretation of the definitions related to non-government.

MS. JEFFRIES:

30 seconds, Kristen.

MS. FOLSOM:

- qualifying employer or purpose, which says the Public Service Loan Forgiveness Program is intended to encourage individuals to enter the- and continue full-time public service. With my last few seconds, I'd like to say that totally, in all my loans totaled $212,000, and even on an IDR, I owe $1,378, which is due right now. With the money that I saved during the pause, what did I do? I helped my daughter, who went to work and volunteered for two years for AmeriCorps and helped her get on her feet and get an apartment. What I did was give to my country a brand new, productive, caring and thinking citizen. Thank you.

MR. WEATHERS:

Thank you, Kristen. Have a good day. Cindy, who do we have next?

MS. JEFFRIES:

Okay. Galaxy A20 is in the room. I'm going to go ahead and let them in again and try to get an identification from them to make sure they're a registered speaker. I would like to remind those who did sign up and registered to be a speaker, now is the time you need to be logging in so that you don't miss your time slot. There are several that have not logged in yet, so I want to give you that reminder that please log in with the link that was provided to you to exercise your speaking slot. Okay. So, I'm going to go ahead and let Galaxy A20 in and you can try to confirm again, John. [Inaudible] is always having difficulty with his internet connecting the audio, I believe. I can barely- I can barely see. Galaxy A20?

MR. WEATHERS:

Can you hear us? Hello. Galaxy A20.

MS. JEFFRIES:

No. I think let's go ahead and remove him. I believe it's a he. I can't see the picture very well. Let's go ahead and remove Galaxy A20. Hopefully they'll log back into the session and it'll work better. We only have one remaining person in the waiting room. So again, if the public commenters that registered and were contacted by the Department please log in to the session. So, we're going to go to Lee Latham. And she's representing herself.

MR. WEATHERS:

Okay. Thank you.

MS. LATHAM:

Hello?

MR. WEATHERS:

Can you hear us?

MS. LATHAM:

Yes I can.

MR. WEATHERS:

Okay. Lee or Elizabeth Latham?

MS. LATHAM:

Yes.

MR. WEATHERS:

Great. Thank you. Thank you for being here and commenting to the negotiators. You have three minutes to make your comments and you will be given a 30-second warning. Your time is starting now.

MS. LATHAM:

Alright. Thank you. My name is Elizabeth Latham. I'm a type one diabetic and I live in the Mississippi Delta. Growing up, I was raised by a single mother, and we lived well below the poverty line. I got the chance to go to college. I was the first person in my family to go to college. And because of that- because of our financial situation, I had to take out student loans. My husband is also a diabetic and believe it or not, our cat is a diabetic, so we are all dealing with a lot of health issues and a lot of medication costs. We both had to take out student loans, and we both went on to become teachers in the public school system. And knowing what you know about the public school system, we don't get paid a lot. Our student loans have not been forgiven through any kind of Public Service Loan Forgiveness, and we are both sitting at around 100,000 each. So we are really struggling to make these payments and we are- yeah, we're just kind of tired and we don't know what to do. We have been in touch with our loan servicers, with government officials, local and federal, state and federal, and we are running out of options. Once payments start, we may not be able to afford the medication that keeps us alive. So that's my story. And I hope that it helps you make some decisions that will help us. And yeah, that's what I have to say. Thank you.

MR. WEATHERS:

Thank you, Elizabeth. Cindy, who do we have next?

MS. JEFFRIES:

Next we have Jeffrey Briggs representing himself.

MR. WEATHERS:

Thank you. Jeffrey can you hear us? Jeffrey, can you hear us? Jeffrey Briggs. Can you hear me? Looks like he's connecting to audio. Jeffrey Briggs, can you hear me? You are muted, if you're trying to talk. Jeffrey, can you hear me? Jeffrey, can you hear me?

MS. JEFFRIES:

He's muted again, John.

MR. WEATHERS:

Yep. Jeffrey Briggs, can you hear me? Can you hear me, Jeffrey Briggs? We cannot hear you.

MR. BRIGGS:

How about now?

MR. WEATHERS:

I can hear you now. Can you activate your video? Thank you. Are you capable of activating your video?

MR. BRIGGS:

Yes.

MR. WEATHERS:

Okay. Welcome to public comment here today. I appreciate you taking the time to speak directly to our negotiators. You will have three minutes to make your comment. You will be given a 30-second warning.

MR. BRIGGS:

Sounds good.

MR. WEATHERS:

Alright. Go ahead. Your time runs now.

MR. BRIGGS:

Okay. I just want to thank you all for doing what you're doing. For making life a little bit easier for us with student loans here. I'm a 65 plus year-old male that has been now collecting Social Security for a couple of years now. I also work a full-time job, and I have to work the full-time job because my wife's ten years younger than myself, and so our loan payments with her working and stuff are way too high. So we need the extra income. And I couldn't- I'm currently on extended pay program but I- that actually was my cheaper route to go next to the pay program, but it's still- you know, it's still a tough nut to crack every month here. My loans have also doubled from the interest over the years. I've been doing loans since 2007. So you can tell I've been doing this a long time here. I have both subsidized on subsidized loans. My main thing for calling and talking to you today is I believe that a student loan should stop once the student starts collecting either Social Security or that can even be an age limit, like 65, 66 years old. And I think that, you know, getting the relief of this loan would be giving seniors like myself almost, almost like a raise on our Social Security as well. You know, I'd like to be able to retire, spend time with my grandkids or I do volunteering, you know, at shelters and things like that. But I'm real limited because I'm stuck working that full-time job. And I've tried- I've reached out to the new- the loan servicer here about the new SAVE program. It seemed like they were kind of a little bit in flux here with the 5 and 10 percent threshold here that doesn't kick in till next 20, you know, 2024. I, I pretty much had to pull that information out to try to figure out where I sat with my loan payments. And so that's kind of the whole, the whole thing that I wanted to talk to you guys about and, and just if you can somehow make that easier if you can, you know, help us seniors with the Social Security, I think that would help us a lot as well. And- but wanted to say I truly appreciate everything that you guys are doing.

MR. WEATHERS:

Thank you, Jeffrey. Appreciate that. Have a good day.

MR. BRIGGS:

Thank you. You too.

MS. JEFFRIES:

Okay, John.

MR. WEATHERS:

So, who do we have up next?

MS. JEFFRIES:

Next we have Alice Smith representing herself.

MR. WEATHERS:

Fantastic. Thank you. Alice, can you hear me?

MS. SMITH:

Hey. Yeah.

MR. WEATHERS:

Welcome today. This is your opportunity to speak directly to the negotiators here. You will have three minutes and you will be given a 30-second warning. Go ahead.

MS. SMITH:

Sure. So I'm a mom of four in Ohio. I have two kids who are college graduates. One almost paid off her loans, one is enrolled in SAVE, and that's awesome. I have two other kids. One is a sophomore and one is a freshman. I was looking at the five point priorities that this committee was contemplating, and I really didn't see anything that's being done for current or future students to prevent them from getting into impossible debt at a young age, or to help make college affordable. As you know, Federal Subsidized Student Loans are, what, 55 to $7,500 a year? You can maybe go to community college for that, you know, for, I guess, the first two years. But college costs $25,000 a year. That's an in-state public school because it's not just tuition. You're mostly required to live on campus. That requirement is 15 grand. You know, how is a family supposed to do it? How is a family like me of four kids supposed to send four kids to college? How are these kids supposed to send themselves to college? It's just not a sustainable thing right now. And I'm- I guess I just want to share kind of a picture of what it is like for me and my kids. And to be frank, uh, making sure they go to college is a priority for me. It's very important that my kids go to college. Education is a doorway to opportunity. But so many kids, my kids friends can't go to college because they can't afford it. They can't go to their school of choice because it's out of reach. There's just not enough support. And, you know, to top it off, something that this Student Loan Forgiveness act, I don't know what it was called did was it messed up family contribution calculations so that if somehow my family was able to afford $20,000 to send my child to college, when I get a second child in college at the same time, remember, I have a sophomore and a freshman, those kids now I suddenly maybe have 20,000 for both of them at the same time. So now I magically manifested 40 grand a year, which is I mean, just do the math on that. And it becomes impossible for anyone who isn't [30 seconds] Yeah. Thank you, thank you. So, yeah, I mean, that's really what I want to share is, you know, the expected family contribution has done irreparable harm to families by changing and there's just a lot less- there's a lot less doorways open for kids now. Remember, they all got two years of high school or junior high or whatever stolen from them during COVID. Like, do we prioritize education or do we prioritize university profits?

MR. WEATHERS:

Thank you, Alice. Appreciate that. Have a good day. I see that we have Galaxy A20.

MS. JEFFRIES:

Yeah, I just-

MR. WEATHERS:

Five minutes left?

MS. JEFFRIES:

We have five minutes left. This is final call for anyone that had a scheduled time slot or on the waitlist today that was notified to please sign in. We will be ending this session promptly at 4:00 pm. In the meantime, I'm going to try Galaxy A20 one more time.

MR. WEATHERS:

Alright.

MS. JEFFRIES:

It looks like they're having trouble with their audio. That same audio.

MR. WEATHERS:

Can you hear us, Galaxy A20? It's still trying to connect. Still not connected. Alright, we have two minutes left before our-

MS. JEFFRIES:

Yeah. Let's move on and wrap it up with any final comments for- from the negotiators or Department.

MR. WEATHERS:

Okay. Alright, folks. We've got a minute or two before we are set to finish. I appreciate the conversation today. I don't know if there's anyone that would like to make a parting comment. If not, I know that we have dates on the book. I believe it's November 6 and 7. Sher, you're getting the last comment. Go ahead.

MS. GAMMAGE:

Yes. I'd just like to raise up and say that the public comment today reflects much of the conversation that we've been having over the- or themes that keep getting repeated and the conversations that we've had as a negotiating committee over the last two days. One, that there are problems with the PSLF program, Parent PLUS, and loans for parents are still an issue. There's an issue with seniors, and there's also issues for people with chronic health conditions, including those with disabilities. So I want us to leave here today and as we go into our debrief, we're talking about buckets today of borrowers, you know, thinking about, you know, who has been consistently held up and brought to the forefront, as we consider in our deliberations and for the DOE to consider as they prepare the document for our review going forward.

MR. WEATHERS:

Thank you, Sher. And with that, we have reached our end time for the day. Thank you very much everyone and I look forward to seeing you in November.

MR. LAGAARD:

Thanks, everybody.

Zoom Chat Transcript
Student Loan Debt Relief Committee - Session 1, Day 2, Afternoon, October 11, 2023
***Chat was copied as presented, as a result minor typos or grammatical errors may be present.**

From A-Carol Peterson HBCU Langston University to Everyone:

The freshstart, IDR, targeted loan forgiveness etc. needs to be automated for the incarcerated student population...this group does not understand and has communication access issues.

From P-Angelika Williams-Private, Nonprofit Institutions to Everyone:

It is John

From Jalil Mustaffa Bishop to Everyone:

I will be the primary Student Borrower Graduate

From Richard Haase to Everyone:

I’m here

From A-Sarah Butts, 4 Year Borrowers to Everyone:

I do not see Sher Gammage. Maybe she needs to be admitted?

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Sher is waiting to be admitted.

From P-Vincent Andrews-Military & Veteran Groups to Everyone:

1. Injured, disabled, incapacitated, elderly (other individuals identified as possessing substantial

hardships regarding employment) - reasonably expected to not have the capacity to regain a full level of employment.

2. Hardships regarding waiver distribution – Consideration should be made regarding how the waiver is applied to loan balances.

From P-Vincent Andrews-Military & Veteran Groups to Everyone:

3. Debt prevents individuals from pursuing professional training or education – potential opportunity to use waivers for certain types of education, training, etc. Some individuals have transcripts and degrees held related to student loan balances.

4. Should there be benchmark incentives for certain high stress, low paying occupations – opportunity to engage with national problems of turnover.

From (P) Jada Sanford - Currently Enrolled to Everyone:

Jordan is becoming primary.

From P- Jessica Ranucci (Consumer Advocates) to Everyone:

Ed is also coming in

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Hardships include:

From A-Carol Peterson HBCU Langston University to

Everyone:

Yes. Thank you Lane

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Hardships may include: low income, single parent household, serious health conditions, such as cancer, high cost of living, caregiving, daycare, etc.

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Agree that IDR does not account for cost of living

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

+1 on regional cost of living differences factoring into hardship

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

Scott is becoming my primary

From P - Ashley Pizzuti - 2yr Borrower to Everyone:

+1 for considering Private loans from for-profits.

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

+1 regarding considering private loan debt as well

From P-Sher Gammage-4 Year to Everyone:

+1 for considering private loan debt

From P- Lane Thompson - state officials to Everyone:

Amber is becoming my primary for this topic

From P-Richard Haase-Student Loan Borrowers-Grad

Programs to Everyone:

+1 for tackling private loan debt

From P - Ashley Pizzuti - 2yr Borrower to Everyone:

David coming in as the primary

From A - India Heckstall, Civil Rights Organization to Everyone:

+1 on Parent PLUS loans being a hardship

From P - Wisdom Cole, Civil Rights Organizations to Everyone:

+1 on Parent PLUS loans being a hardship

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

+1 on including Parent Plus in need for forgiveness…

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

Additional information about the cost of caregiving: More and more people are going into retirement with debt. Not only because of inflation and higher cost of living, but also due to student loan debt burdens, medical debt, and healthcare expenses that often become more costly as we age. Additionally, many retirees and families are also taking on the role of unpaid caregivers for their aging loved ones. Caregivers sacrifice a lot to provide support for loved ones—including their own financial well-being. According to a study by AARP, "78% of caregivers have out-of-pocket expenses related to caregiving and spend, on average, a quarter of their income on caregiving activities. On top of that, caregivers often dip into their savings, take on debt and have to work fewer hours at their paying jobs."

From A-Sarah Butts, 4 Year Borrowers to Everyone:

+1 on Parent Plus loans being a hardship.

From P-Angelika Williams-Private, Nonprofit Institutions to Everyone:

+1 that parents do not benefit from the degree attainment

From A- Lane Thompson - state officials to Everyone:

+1 for Parent Plus and private loan amount being considered a hardship

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

And reiterating +1 for addressing borrowers above a certain age

From A - India Heckstall, Civil Rights Organization to Everyone:

+1 that parents do not benefit from the degree attainment

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Agree with Richard.

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

It's absurd for Jordan's parents to be paying for sending him and his twin to college into his mid 80s

From A - India Heckstall, Civil Rights Organization to Everyone:

+1 cancelling debt on Parent PLUS loans

From P-Angelika Williams-Private, Nonprofit Institutions to Everyone:

Thank you, Jordan!

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

+1 on Parent Plus loans posing heightened hardship to borrowers. We could also consider being over the age of 65 as a hardship as well

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Parents also have to figure out how to balance allocation of funds to support their children's higher ed access and funding their own retirement.

From P - Ashley Pizzuti - 2yr Borrower to Everyone:

+1 on Parent Plus Cancelation

From A- Lane Thompson - state officials to Everyone:

Amber is now serving as primary for state officials - already put in chat but did not hear acknowledgement

From P - Melissa Kunes - Public 2 & 4 Yr Institutions to Everyone:

Any borrower over the age of 65 should be considered a hardship, regardless of the loan - student direct or

Parent PLUS.

From P-Sher Gammage-4 Year to Everyone:

+1 Melissa

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

+1 Melissa

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

+1 Melissa

From P-Angelika Williams-Private, Nonprofit Institutions to Everyone:

Wisdom has a story that once again leads back to creditworthy employment is impacting repayment

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

+1 Wisdom

From P-Angelika Williams-Private, Nonprofit Institutions to Everyone:

+1 medical hardship deferment

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

100% agree on the psychological harm borrowers' student loan debt causes them

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

Thanks Wisdom! And we've learned so much about the impact of trauma on young people AND that living in poverty is like being subjected to CONSTANT TRAUMA

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

Forces that keep families down financially don't just impact the borrower

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone: But their children as well

From Sandra Boham TCU, HBCU, MSI to Everyone:

The public service loan forgiveness paperwork is incredibly burdensome. The process needs to be simplified so that is easier to complete the application.

From A - India Heckstall, Civil Rights Organization to Everyone:

coming in as primary for civil rights org

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Hardship may be an unfortunate reality for certain professions/roles that require higher education and sometimes low pay. The Department might review borrower data to determine trends and develop plans for student debt relief for certain types of workers.

From (A) Ed Boltz (Consumer Advocate- NACBA/NASLL) to Everyone:

The Department of Education regulations should take less stringent positions on hardship than the DOJ pushed for in bankruptcy, especially as ED argued (with its own lawyers at DOJ) for a less stringent standard.

From A-Jalil Mustaffa Bishop-Student Loan Borrowers-Grad Programs to Everyone:

Data on borrowers' hardships in their own voices:

1. https://edtrust.org/blackstudentdebthub/

From Sandra Boham TCU, HBCU, MSI to Everyone:

Bankruptcy remains on your credit report for 10 years. That option does not improve the borrowers position

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

The Department could automate relief for Parent PLUS borrowers whose student had an EFC was $0, meaning that the borrower is low-income

From A - India Heckstall, Civil Rights Organization to Everyone:

+1 Kyra

From A-Jalil Mustaffa Bishop-Student Loan Borrowers-Grad Programs to Everyone:

Data Request: Can the Dept of Edu provide themes that reflect the hardships borrowers are sharing with them in public comments or through other pathways?

From A-Jalil Mustaffa Bishop-Student Loan Borrowers-Grad Programs to Everyone:

+1 Kyra
From A-Sarah Butts, 4 Year Borrowers to Everyone:
Agree, Sandra. Also, there are public service and essential workers across the country who do not qualify for the PSLF program, despite their life long commitment to public service. If the Department published a list of jobs that qualify for PSLF, that would help borrowers.
From P- Kyra Taylor, Legal Assistance Orgs to Everyone:
+1 on providing relief to borrowers who are scammed by debt relief companies
From A-Jalil Mustaffa Bishop-Student Loan Borrowers-Grad Programs to Everyone:
"Parent PLUS loans, created by Congress to give middle-class parents flexibility in how they pay for college, out of necessity are increasingly used by low-income families. Among Black families who use Parent PLUS, the share with no expected family contribution now exceeds 40 percent, and the share among Latino families is also high, above 25 percent" "These loans compound racial disparities across families' financial lives. Half of white parent-borrowers have savings and investments exceeding $100,000, versus only a quarter of Black or Latino/a parent-borrowers. And more than half of Latino/a parent-borrowers have just a high school diploma or lower

level of education."

More context on Parent Plus loans:

https://tcf.org/content/report/parent-plus-borrowers-the-hidden-casualties-of-the-student-debt-crisis/

From P-Amber Gallup-State Officials to Everyone:

Changing back to Alternate for State Officials and Lane Thompson will return as Primary for STate Officials

From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:

Stepping back in as P for grad borrowers

From Sandra Boham TCU, HBCU, MSI to Everyone:

There is only 1 TCU that participates in the Student Loan Program. That is because of the place based students we serve and the wages paid in our communities. SKC provides loans, but we have one person whose total focus is loan repayment. We do not package loans because we know financial literacy is an issue. We see many students who come to us with large debt and no degree. We do what we can to get them back in good standing, but it is not a fix

From (A) Ed Boltz (Consumer Advocate- NACBA/NASLL) to Everyone:

These regulations can and should be used to unrachet the bankruptcy standard for undue discharge

From A-Sarah Butts, 4 Year Borrowers to Everyone:

The Department might also consider limiting the fees that universities can charge borrowers related to federal loans. These fees create stress and hardship for borrowers, especially those who are first generation, low income, etc.

From (A) Ed Boltz (Consumer Advocate- NACBA/NASLL) to Everyone:

+1 for Jessica's concerns about student loan relief scams

From A-Jalil Mustaffa Bishop-Student Loan Borrowers-Grad Programs to Everyone:

+1 John's point that we can use social welfare programs that already measure hardship to do auto relief for borrowers and this will capture many elderly/struggling borrowers

From A - Jordan Nellums - Currently Enrolled Postsecondary Education to Everyone:

+ 1 regarding John's point of using social welfare programs as a determinant of hardship

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Another hardship to consider is that Social Security survivor benefits are no longer available to undergraduate students in college.

From P - Ashley Pizzuti - 2yr Borrower to Everyone:

Changing back to the primary spot.

From P-Richard Haase-Student Loan Borrowers-Grad

Programs to Everyone:
Jalil back in seat for Graduate Borrowers
From A-Sarah Butts, 4 Year Borrowers to Everyone:
For Parent Plus borrowers, the student loan debt burden is not always shared by both parents. This can be a substantial hardship for some parents.
From A - India Heckstall, Civil Rights Organization to Everyone:
+1 Sarah
From A-Amber Gallup-State Officials to Everyone:
I'd like to do a data request for student loan default rates in Native American communities
From A-Sarah Butts, 4 Year Borrowers to Everyone:
Also, single parents may appear to have "sufficient income" but the costs as a head of household actually result in hardship and struggling to make ends meet.
From P-Vincent Andrews-Military & Veteran Groups to Everyone:
Some parents have to file their taxes separately to avoid higher payments of student loans
From P-Richard Haase-Student Loan Borrowers-Grad Programs to Everyone:
Aside from simplified forms, we should remove additional steps that complicate the process and contribute to distrust in the process… converting and consolidating

loans so they can be forgiven under a different name is a deterrent

From P-Angelika Williams-Private, Nonprofit Institutions to Everyone:

Another hardship to consider is the discrepancy between an individual's income growth and the rate at which their loan debt is increasing. In some cases, the increase in loan debt outpaces their income, creating a challenging financial situation.

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

+1 Sher re: acknowledging chronic illness

From A - India Heckstall, Civil Rights Organization to Everyone:

+1 chronic illness should be a category for student debt cancellation

From John S. Whitelaw, (he/him) Advocacy Director, CLASI (Delaware) to Everyone:

individuals with Obamacare and a subsidy

From A-Sarah Butts, 4 Year Borrowers to Everyone:

An indicator of hardship may be workers who are consistently working more than one job.

From A-Amber Gallup-State Officials to Everyone:

I keep reflecting on the growing income gap in the United States and the hardship that almost all Americans are experiencing - economic, educational, health, and other disparities are only growing. At a certain point, the question becomes less Who has hardship? and more like "Who doesn't?" There's a futility to defining all the intersecting groups that are experiencing hardship.

From A-Amber Gallup-State Officials to Everyone:
Yes, what Mr. Whitelaw just said.

From A-Sarah Butts, 4 Year Borrowers to Everyone:
Regarding Parent Plus loans, some parents expect their children to be responsible for the payments. This is a complicated debt and hardship for some students.

From P-Sher Gammage-4 Year to Everyone:
I think intersectionality is important and a useful frame through which to look at waivers based on hardship. Yes, in this economy we all have some form of hardship, yet certain groups bear a disparate amount and it is my hope the department consider their loans for waiver if we want to capture as many borrowers who can benefit from waivers which can be granted by the U.S. DOE

From P-Sher Gammage-4 Year to Everyone:
Sarah Butts will take over as primary

From (P) Jada Sanford - Currently Enrolled to Everyone:
+1 Sher, intersectionality is important to note. Typically if you have one hardship, you have another

From John S. Whitelaw, (he/him) Advocacy Director, CLASI (Delaware) to Everyone:
another one: recipient of subsidized housing/resident of public housing/usda/litc
From P- Kyra Taylor, Legal Assistance Orgs to Everyone:
+1 to John— can also look at the receipt of public benefits, food stamps, etc.
From P - Ashley Pizzuti - 2yr Borrower to Everyone:
Question: is the department going to take the demand letters into consideration under this NegReg
From P-Vincent Andrews-Military & Veteran Groups to Everyone:
Hardship can also be easily identified through records of payments that servicers have had set at $0 for several years. These payments always result in ballooning balance, and there are several employment and family factors attributed to the status of these loans that can reasonably assumed to not substantially change over the next 5-10 years.
From P-Sarah Butts, 4 Year Borrowers to Everyone:
Our discussion illustrates the need for both immediate and also long term reforms to financing higher education. The Administration should consider support for scaling Child Development Accounts as a longer term strategy of

funding higher ed. CDAs have been implemented in multiple states and countries already.

From A-Amber Gallup-State Officials to Everyone:

Sher makes an excellent point above that supersedes my own. While from an economic and growing social disparity perspective, we have increasing numbers of Americans in hardship, there are groups that certainly bear a disproportionate amount of that hardship, and the Dept. is hearing about many of those now.

From (A) Ed Boltz (Consumer Advocate- NACBA/NASLL) to Everyone:

Bankruptcy is the exception to the lack of review of assets in determining student loan discharge, which argues in favor of it not having a more stringent standard for income than otherwise

From P-Sarah Butts, 4 Year Borrowers to Everyone:

+1 for Lane on income vs. wealth

From A-Jalil Mustaffa Bishop-Student Loan Borrowers-Grad Programs to Everyone:

There is no program that considers wealth and that creates a massive hardship for many borrowers, especially borrowers of color.

Student Debt should cancellation should consider wealth, not incomehttps://www.brookings.edu/articles/student-debt-cancellation-should-consider-wealth-not-income/

From John S. Whitelaw, (he/him) Advocacy Director, CLASI (Delaware) to Everyone:

Receipt of Workers Comp

From A - Jordan Nellums - Currently Enrolled Postsecondary Education to Everyone:

Jada is back as primary

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Sher Gammage is now primary for 4 year borrowers.

From A-Sarah Butts, 4 Year Borrowers to Everyone:

+1 Lane

From P-Sher Gammage-4 Year to Everyone:

+1 Yael!

From P - Lane Thompson - state officials to Everyone:

+1 to Yael - some borrowers who have already been approved for cancellation need additional relief

From A-Sarah Butts, 4 Year Borrowers to Everyone:

Are the alternates joining as well?

From P-Angelika Williams-Private, Nonprofit Institutions to Everyone:

I am not sure what areas of discussion but higher education administrators may have insight.

From Jalil Mustaffa Bishop to Everyone:

What do we do while they caucus?

From (P) Richard Haase - Graduate Borrowers to Everyone:

Jalil in seat for Graduate Borrowers
From P - Scott Buchanan - FFEL, Servicers, GAs to Everyone:
Ben Lee will come to the table
From P- Kyra Taylor, Legal Assistance Orgs to Everyone:
+1 re: relief for students that didn't complete either grad and undergrad programs
From Jalil Mustaffa Bishop to Everyone:
From the Dept's July 2023 final rule on REPAYE: "Among undergraduate only borrowers who recently entered repayment, 22 percent of borrowers who did not complete a credential are using an IDR plan, and IDR usage increases as educational attainment increases: 24 percent of those who completed a sub- baccalaureate credential and 25 percent of those who completed a bachelor's degree but not a graduate degree are on IDR plans. About half of borrowers who completed a graduate degree and recently entered repayment on are on IDR plan. These results are shown in Table 2.1 below."
From P - Ashley Pizzuti - 2yr Borrower to Everyone:
FTC complaints as well
From (P) Richard Haase - Graduate Borrowers to Everyone:
Brief list of some of the groups identified to consider

targeting for relief:

- Borrowers with loans that pre-date 2010.
- Borrowers whose primary source of income is Social Security.
- Borrowers paying for higher education for their children.
- Borrowers with broken or missing loan data.
- Borrowers who did not finish their programs/ earn degrees.
- Borrowers who have filed for bankruptcy.
- Borrowers identified as experiencing significant hardship (as identified by later defined measures).
- Borrowers whose incomes as defined by profession/established by a Financial Value Transparency Framework render them unable to pay in a reasonable amount of time.
- Borrowers who attended closed schools.
- Borrowers in joint consolidation programs.
- FFEL, Parent Plus and Perkins loans must be included under all the above targeted groups.

From P - Lane Thompson - state officials to Everyone: +1 to Jalil - Pell Grant eligibility is a better metric for wealth than current borrower income, in many cases

From (P) Richard Haase - Graduate Borrowers to Everyone:

Also discussed importance of

- Loans over a certain age
- Borrowers over a certain age
- Interest: waiving application of; applying payments of interest toward principal
- Importance of Automation

From Sandra Boham TCU, HBCU, MSI to Everyone:

TCU's, HBCU's and MSI's have advocated for the PELL to be doubled. If we learned anything during the pandemic, we learned that students who have adequate resources have higher persistence and graduation rates. In low income communities. They access less total dollars in loans

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

Also to add to Rich's list: - defaulted borrowers who will not repay their debt in full within a reasonable time

From (P) Richard Haase - Graduate Borrowers to Everyone:

Thanks Kyra

From P- Kyra Taylor, Legal Assistance Orgs to Everyone:

*will not or have not repaid

From P - Ashley Pizzuti - 2yr Borrower to Everyone:

I would like a list of social media outreach the

Department already has already has in place. Along with if they have any advertising budget to use targeted algorithms on social media to get some of these programs to the right people.

From Jalil Mustaffa Bishop to Everyone:

Data Request: Parent Plus Loan repayment across age cohort, length of time in repayment, number who have $0 EFC, number who have $0 monthly payment, and other data metrics to understand who Parent Plus borrowers are

From P - Scott Buchanan - FFEL, Servicers, GAs to Everyone:

Per ED request for the chat record, just wanted to reiterate areas we think ED should be mindful of during drafting. It's important that ED be very diligent on its legal justification for any reg so that we don't potentially have proposed rules that would not withstand legal scrutiny, so that borrowers can be confident that promised options will actually stand as they make financial choices. Also, it's important to deeply consider practical operational plans or implementation in advance so that we can ensure there is time and resources to implement quickly, rather than taking months or years. Also, making the rules simple and clear so borrowers can understand and access any benefits - rather than being further confused - is essential.

From P - Ashley Pizzuti - 2yr Borrower to Everyone:
Data request: I would like to see a list of BDTR applications currently by school. These should include those who have already received forgiveness due to litigation. Corinthian, ITT, Sweet v. Cardona Class members borrowers for example. The list should include any school with more than 100 BDTR applications and if that school is currently operating or if they have closed. I think this will give us a good baseline on those schools that don't meet the minimum level of financial value. It will also help create a cohort of borrowers who should be prioritized in relief.
From (P) Richard Haase - Graduate Borrowers to Everyone:
I think Wisdom is in the waiting room
From Jalil Mustaffa Bishop to Everyone:
Wisdom Cole is in the waiting room. Fyi
From A - India Heckstall, Civil Rights Organization to Everyone:
Wisdom is still in the waiting room
From John S. Whitelaw, (he/him) Advocacy Director, CLASI (Delaware) to Everyone:
powerful comments from PSLF borrower -- heartbreaking
From P-Vincent Andrews-Military & Veteran Groups to Everyone:

Great comments...I too worked a substantial time period as a government contractor in the same duty location as when I was active duty

From P - Scott Buchanan - FFEL, Servicers, GAs to Everyone:

Ben Lee is coming to the table.