

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Tamy Abernathy
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

March 2, 2026

Re: Notice of Proposed Rulemaking Docket ID ED-2025-OPE-0944; RIN 1840-AD98

Dear Under Secretary Kent and Director Abernathy:

We, the 86 undersigned organizations representing millions of students, borrowers, workers, people of color, women, veterans, people with disabilities, and consumers, urge the U.S. Department of Education (ED) to protect borrowers from economic harm as the proposed rule under the Reimagining and Improving Student Education (RISE) Negotiated Rulemaking is finalized and implemented.

As ED seeks to implement the unprecedented, vast, and harmful changes to the student loan system dictated by the One Big Beautiful Bill Act (OBBBA), Americans face a severe affordability crisis spanning every aspect of their financial lives. The law and these regulations will significantly exacerbate challenges most student loan borrowers already face in attempting to repay student loan debt, especially when that debt has not led to improved economic outcomes. Cuts to federal loan access will make it increasingly difficult for all but the wealthiest students to pay for college or to attend graduate programs in critical fields such as nursing, education, and social work without turning to risky, expensive private loans. Changes to the student loan repayment system will [increase payments for most borrowers](#), including those with very low incomes, likely driving many more people into student loan default.

Moreover, the scale and speed at which the student loan system must change to accommodate this overhaul will likely lead to more harm for borrowers as ED may struggle to communicate with servicers and enact the proposed rule with ED's remaining skeleton staff. **We urge ED to ensure that borrowers are protected during the transition.**

The new Repayment Assistance Plan will raise costs for borrowers and increase distress among borrowers. Therefore, we urge ED to do all it can to cushion the impact of these changes on borrowers.

Most notably for borrowers, this rule implements the new "Repayment Assistance Plan" (RAP), which requires even the lowest-income borrowers to make [higher monthly payments](#) and for a longer repayment term than prior plans. RAP also gives more benefits to higher-income borrowers and removes provisions meant to protect borrowers from having to choose between covering their basic needs and paying their student loans. Borrowers in RAP will also see [unpredictable payment spikes](#) whenever their income crosses certain arbitrary thresholds, meaning they could be penalized for even small cost-of-living raises. While the new plan includes helpful interest and principal match subsidies, because it forces borrowers to make

significantly higher monthly payments, these benefits will be [out of reach](#) for many. OBBBA also eliminated the economic hardship and unemployment deferments that enabled borrowers to temporarily pause their loan payments during times of acute financial distress.

While we acknowledge that rescinding OBBBA's harmful provisions is beyond ED's rulemaking authority, we urge ED to do all it can to cushion the impact of these changes on borrowers. ED must work closely with loan servicers to provide borrowers with clear, timely, and actionable information and resources about how these changes will affect them and how to access the plan of their choosing—and to ensure that the servicers are following the guidance ED provides. We also urge ED to hold borrowers harmless throughout the transition process, and to extend its pause on involuntary collections. Doing so will give both borrowers and ED more time to implement the massive changes before them. This is especially important as ED continues its plans to force millions of borrowers to transition out of the Saving on a Valuable Education (SAVE) plan and into the new, more expensive system.

The proposed rule implements many of the stark changes included within the One Big Beautiful Bill Act that will make paying for college more expensive and risky for students and push more families into the private loan market. We urge ED to reconsider its narrow definition of “professional degrees” which will make it harder for students to access necessary federal loans to pay for their graduate-level education.

The new law eliminates the Graduate PLUS loan program, which was the sole program dedicated to helping graduate and professional students finance the whole cost of attendance for their education and limits how much students and families can borrow in federal student loans. At the same time, the law failed to make concurrent new investments in grant aid to prevent the need for borrowing in the first place and does nothing to force colleges and universities to immediately lower their costs.

We are particularly concerned by ED's decision in implementing these new lending limits to include a narrow list of professional degree programs that would qualify for the higher lending caps (\$50,000 annually or \$200,000 total) and leave students pursuing other graduate level degrees, such as those in [nursing](#), social work, public health, and education to qualify for **only half** of the amount in federal student loans.

Research has found that only [5 percent of graduates in the most awarded advanced degree fields would qualify for the proposed “professional” degree loan caps](#), which demonstrates how these new borrowing caps will be placed among the largest sectors of graduate education and will have a disproportionate negative impact on women and students of color. Experts have also [cautioned](#) that these lower federal lending caps will leave students and families with significant financial aid gaps, where they'll either be forced into the private market where loans are [harder to access](#), more expensive, and [come with fewer protections](#)—or be forced out of higher education altogether. We call on ED to reconsider this decision.

We are also deeply concerned by the OBBBA policy that pro-rates loan limits for students attending less than full-time, as well as provisions that allow institutions with wide discretion to limit the availability of federal loans for students in certain programs. These provisions will severely reduce the ability of part-time students to meet their essential needs. The Department has chosen not to include any additional protections for students in the proposed rule to ensure they are properly informed of the new limits or to establish guardrails on institutional decision-making for program-level limits that could significantly reduce access.

We are particularly concerned with the ability and capacity of ED and its student loan servicers to properly implement such sweeping changes to the student loan system within such a small window of time, while also protecting student loan borrowers.

As you know, over the first year of the Trump Administration, ED has been stripped of nearly half of its staff. As a result, borrowers now have less access to ED staff in the case that they are experiencing issues with their student loans or their servicer. Current borrowers continue to face massive application backlogs to access affordable repayment options, and with the loss of the more affordable SAVE plan—the result of ED’s decision to settle litigation—millions more borrowers will need to take action in the near future to remain in an Income-Driven Repayment (IDR) plan. Further, as a result of OBBBA, current Parent PLUS borrowers not already enrolled in an IDR plan must consolidate their loans in order to maintain access to an income-driven plan before July 1, 2026.

As the Department works to implement these massive changes to the student loan program and repayment system on an unprecedented timeline and as critical deadlines approach that will determine borrowers’ access to critical benefits, it is essential that the Department ensure that no borrower is driven further into debt due to administrative delays, servicing errors or other barriers borrowers may face while waiting to access affordable repayment options they are entitled to under federal law.

Amidst a growing affordability crisis where students and families are struggling to cover rising costs of basic needs and everyday essentials, the stakes could not be higher. Therefore, we ask the Department to implement the OBBBA in a way that cushions borrowers forced into RAP, protects borrowers from servicing errors, and ensures students can enter critical professions without needing to turn to risky private loans.

Sincerely,

The Institute for College Access and Success
Protect Borrowers

National Organizations

AACTE (American Association of Colleges for Teacher Education)

Affordable Homeownership Foundation Inc.
AFT: Education, Healthcare, Public Services
Alliance for a Just Society
American Association of University Professors
American Association of University Women (AAUW)
Autistic Women & Nonbinary Network
Center for Responsible Lending
Clearinghouse on Women's Issues
Clinical Social Work Association
Communities for Our Colleges
Consumer Action
Council on Social Work Education
EdTrust
Feminist Majority Foundation
Formerly Incarcerated College Graduates Network
Fosterus
International Federation of Professional and Technical Engineers (IFPTE)
League of United Latin American Citizens (LULAC)
MDC
Minority Veterans of America
NAACP
National Association of Student Loan Lawyers
National Association of Pediatric Nurse Practitioners
National Association of Social Workers
NASPA-Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
National Council of Asian Pacific Americans
National Disability Institute
National Education Association
National LGBTQ+ Bar Association
NBJC
Protect All Children's Environment
Secular Student Alliance
Service Employees International Union (SEIU)
Southeast Asia Resource Action Center (SEARAC)
Student Debt Crisis Center
The Hope Center for Student Basic Needs
UnidosUS
URGE: Unite for Reproductive & Gender Equity
Young Invincibles

State & Local Organizations

ACT-UAW Local 7902

Alliance for Girls
Associated Students of the University of Oregon (ASUO)
ASUC EAVP Office
ASUCI
ASUCR External Affairs
CASH Campaign of Maryland
Center for Access to QDROs
Center for Elder Law & Justice
Church Women United in New York State
Coalition of California Welfare Rights Organizations (CCWRO)
Community Service Society of New York
Connecticut Voices for Children
Fayetteville Police Accountability Community Taskforce
Georgia Watch
Housing and Economic Rights Advocates
La Raza Centro Legal, SF
Legacy Bridge CDC
Long Beach Alliance for Clean Energy
Maryland Center for Collegiate Financial Wellness
Miami Valley Fair Housing Center, Inc.
Mountain State Justice
New Jersey Appleseed Public Interest Law Center
New Jersey Association of Mental Health and Addiction Agencies, Inc.
New York Legal Assistance Group (NYLAG)
NextGen California
Nonprofit Professional Employees Union, IFPTE Local 70
Partnership for College Completion
Progressive Leadership Alliance of Nevada
Students Engaged in Advancing Texas (SEAT)
Students United
Texas-American Federation of Teachers
Texas State Teachers Association/ National Education Association
The Freedom BLOC
UFC-NYC
University of California Student Association (UCSA)
United University Professions
United Vision for Idaho
Vermont-NEA
VOCAL-NY
Washington Office of Student Loan Advocacy
Wisconsin Education Association Council
Women Employed