



## Denisa Gándara's Public Comment on the U.S. Department of Education's Proposed Title IV Regulations

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My name is Denisa Gándara and I am an Associate Professor of Educational Leadership and Policy at the University of Texas at Austin. I applaud the department for taking steps to streamline federal financial aid programs in ways that reduce burdens on both students and higher education institutions.

First, I want to underscore the importance of not only maintaining but expanding access to post-secondary education as a driver of our nation's economic well being. This includes four year and advanced degrees, which are essential, as well as associate degrees and shorter term credentials. Our knowledge economy is central to America's global competitiveness, and that hinges on access to education for everyone, regardless of economic circumstances. Second, I want to offer a few suggestions for reducing the administrative burdens that students face in accessing federal financial aid, particularly through income-driven repayment plans. I agree with the premise that simplifying repayment by streamlining IDR options into a single plan can reduce confusion and enhance transparency for borrowers. But simplification should not come at the cost of affordability or access.

To truly support borrowers, the new plan should include strong protection, such as a low-income repayment threshold, ideally 5%, and interest subsidies that prevent balances from growing when payments are too low. The new plan should also offer forgiveness after a reasonable period, ideally between 10 and 20 years, and to reduce informational barriers, which are significant when it comes to income driven repayment, the new plan should be paired with loan counseling and communication tools. This is one area where AI could be leveraged to deliver personalized accessible guidance. One word of caution here is that data protection and privacy should be prioritized. The new plan should also grandfather in existing borrowers and avoid forcing transitions into the new plan, which could disrupt the lives of those who made financial and life decisions based on current repayment terms. Crucially, any changes should preserve the public service loan forgiveness program while refinements to improve access and clarify eligibility are welcome changes, shouldn't reduce benefits for public servants or discourage talented individuals from entering public service.

As we've heard throughout the day, teachers, nurses, public defenders rely on PSLF to sustain their livelihoods and to plan for the future. Finally, I urge the department to put in place a plan to evaluate the effects of any changes made through this rulemaking process, including on borrower outcomes. In closing students and borrowers are watching, as we've heard today and as research confirms, loan uncertainty affects not just their finances, but also their mental and physical health, their career paths, their workplace productivity, home ownership, and their family planning decisions. I hope this process results in reforms that make college more affordable, not less affordable for people seeking higher education and a better life. Thank you.