



May 7, 2025

Via Email: www.regulations.gov

Mr. James P. Bergeron
Acting Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: DOCKET ID ED-2025-OPE-0016 – Response to the Intent to Receive Public Feedback for the Development of Proposed Regulations and Establish Negotiated Rulemaking Committee

Dear Mr. Bergeron:

As the trade associations representing the lenders, servicers, and/or guaranty agencies in the Federal Family Education Loan (FFEL) program, thank you for the opportunity to provide initial comments to the Department of Education's intent for the development of proposed regulations and the establishment of a negotiated rulemaking committee(s). Our comments are specific to student loan repayment plans.

CBA, EFC, NASLA, NCHER and SLA continue to support the streamlining of student loan repayment plans in the Direct Loan program. Consistent with past public comments, we recommend reducing the number of income-driven repayment (IDR) plans available to borrowers. Importantly, this must be done in accordance with the specific terms and conditions that are supported by the Higher Education Act (HEA) of 1965 as amended. Most importantly, the available IDR plans must be designed with borrowers in mind.

With the April 21, 2025, return to repayment announcement by the Department, borrowers must be able to understand their repayment plans and know they can rely on the promised terms and conditions. Borrowers also need to know there are tools available to help them successfully repay without the risk of legal challenges that result in implementation delays and the complete undoing of repayment plans. This is especially critical as the Department resumes federal student loan collections and other actions to help borrowers get back in repayment. The FFEL community stands ready to help struggling borrowers understand how to successfully navigate student loan repayment, avoid delinquency, and recover from default.

Thank you for the opportunity to provide our initial comments. On behalf of the borrowers and families we serve, the FFEL community looks forward to participating in the upcoming loan repayment negotiated rulemaking committee process as we have done in the past.

Sincerely,

Consumer Bankers Association (CBA)
Education Finance Council (EFC)
National Association of Student Loan Administrators (NASLA)
National Council of Higher Education Resources (NCHER)
Student Loan Servicing Alliance (SLSA)