



Office of the President

May 2, 2025

James P. Bergeron
Acting Under Secretary
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Docket No. [ED-2025-OPE-0016](#)

Dear Acting Under Secretary Bergeron:

We write in response to the U.S. Department of Education (“the Department”) request for Public Feedback for the Development of Proposed Regulations and Establish Negotiated Rulemaking Committee. Our comments focus on ways the Department can improve federal financial aid borrowing and repayment. Southern New Hampshire University (SNHU) is a private, nonprofit, accredited institution with a 92-year history of educating traditional-aged students and working adults. Now serving more than 200,000 learners, SNHU offers approximately 200 undergraduate, graduate and certificate programs, available online and on-campus in Manchester, NH.

SNHU is committed to high-touch financial advising, including working with students to determine how much they need to borrow to cover their expenses. While our students have a debt level below the national average, amidst the pandemic student loan repayment pause and shifting servicing landscape, it became clear that borrowers needed additional support to navigate a confusing repayment system. In response to this need, SNHU set up a dedicated team and call center to proactively reach out to students and graduates about their student loan options and provide hands-on support to set up an account with a student loan servicer and enroll in a repayment plan that makes the most sense for them.

Having a proactive approach supporting SNHU students and alumni pay-off their loans has helped us understand what students and borrowers need to stay out of delinquency and default. Borrowers want to be paying towards their student loans, but in cases where their balances keep growing, paying off their student loans feels impossible, they feel hopeless

and are less likely to make regular payments. A borrower in active repayment is more likely to remain in good standing and make higher payments as their income increases over time. Borrowers need affordable options with attainable repayment terms, and access to trained personnel to provide hands-on support.

Here are some recommendations for the Department's consideration for the negotiated rulemaking:

- **Income-Driven Repayment (IDR) Options:** SNHU helped many borrowers enroll in the Saving on a Valuable Education (SAVE) repayment plan who are now confused by their loan repayment status while SAVE is litigated in court. Many borrowers who chose SAVE did so because they struggle to pay their student loans but want to be making regular payments toward their loan balances and be in good financial standing.
 - **Recommendation:** Ensure income-driven-repayment options are affordable for all income levels so that borrowers are able to pay their student loans on time and stay out of delinquency.
 - **Recommendation:** Maintain Public Student Loan Forgiveness (PSLF) that allows borrowers to work in lower-paying, public service jobs. Efforts to cap forgiveness levels and income eligibility would have a direct impact on recruitment efforts in high-demand public and non-profit sectors such as healthcare and education. Limiting this program would disproportionately harm lower income communities.
 - **Recommendation:** Make IDR plan options available on an accessible platform to ensure that borrowers can easily access the forms necessary to enroll and recertify their income.
- **Attainable Loan Repayment:** Borrowers are less likely to repay their student loans when their balance continues to grow despite making regular payments. This was an important component of SAVE freezing interest for borrowers making payments that did not go toward their principal.
 - **Recommendation:** Interest should not accrue beyond the current balance when borrowers are making on-time, income-based repayments.
 - **Recommendation:** Borrowers should be incentivized to make on-time payments through interest deductions that are similar to the automatic payment discount currently available.
 - **Recommendation:** Maintain existing regulations that limit the capitalization of unpaid interest within the Department's existing authority and work with Congress to lower interest and eliminate student loan interest capitalization in all cases.

- **Improve Student Loan Servicing:** Many borrowers don't know who their student loan servicer is or how to contact them. When borrowers do connect with their servicers they are often faced with long hold times on the phone and inadequate email responses. These communication issues create an enormous barrier to on-time loan repayment.
 - **Recommendation:** Provide adequate staffing at the Department to be available for borrowers navigating the student loan servicing process.
 - **Recommendation:** To help address servicing complexity for borrowers, reduce the number of federal student loan servicers.
 - **Recommendation:** Utilize performance-based contracting to reward student loan servicers that meet the Department's minimum Service Level Agreement (SLA) metrics and improve loan repayment outcomes.
 - **Recommendation:** Provide incentives for servicers to modernize their platforms and improve technology, including putting in place automated services.
- **Financial Literacy:** When borrowers understand their options, have affordable repayment pathways, and understand how borrowing student loans connects to their overall financial well-being, they are more likely to repay their loans.
 - **Recommendation:** Support financial advising throughout the loan borrowing and repayment process for current and future student loan borrowers.
 - **Recommendation:** Provide technical assistance and require mandatory loan counseling by institutions throughout the student loan borrowing process.
 - **Recommendation:** Require servicers to conduct "at-the-right-time" outreach to borrowers after their first missed, or consistently late, payment to avoid delinquency.

Student loan borrowers want to repay their loans, but they need the right options and support to do so. We urge the Department to consider the recommendations outlined above.

Thank you for your consideration of our comments on these matters.

Sincerely,

A handwritten signature in blue ink, reading "Lisa Marsh Ryerson", followed by a horizontal line.

Lisa Marsh Ryerson
President