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August 28, 2025

Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue SW, 5th Floor  
Washington, DC 20202

**Re: Docket ID ED-2025-0151**

Dear Members of the Rulemaking Committee,

On behalf of the American Association of University Women (AAUW) and our members nationwide, I submit these comments in response to the Department of Education's Notice of Proposed Rulemaking (NPRM) to convene two negotiating committees to discuss sweeping changes to student loan borrowing, repayment, and institutional accountability. AAUW urges the Department and negotiators to ensure that gender and racial equity are central to every decision.

AAUW, the nation's largest non-institutional funder of women's graduate education, has long championed equitable access to higher education. We know firsthand how a college degree – and especially an advanced degree – can open doors to leadership and economic security for women and communities historically excluded from opportunity. As AAUW's *Deeper in Debt* research showed, affordable higher education is not just a personal aspiration—it is a public good and a pathway to equity. Yet the "One Big Beautiful Bill" shifts resources away from students to pay for tax cuts for the wealthy, making higher education more unaffordable for many and completely unattainable for some. The Department must mitigate these harms and preserve access for all students.

The Department has announced two committees: the Reimagining and Improving Student Education (RISE) Committee, focused on federal student loan changes, and the Accountability in Higher Education and Access through Demand-Driven Workforce Pell (AHEAD) Committee, focused on Pell expansion and accountability.

### **Composition of the Negotiating Committees**

AAUW strongly recommends that both committees include a broad and representative set of negotiators, especially women borrowers, borrowers of color, student parents, and individuals from low-income communities who are most affected by student debt and institutional accountability policies. Ensuring their voices are at the table is critical to creating regulations that reflect the lived realities of those most impacted.

### **Issues Related to the RISE Committee**

**Graduate and Professional PLUS Loans.** Eliminating Grad PLUS will disproportionately harm women, student parents, and students of color who rely on these loans to bridge the gap between unsubsidized loans and actual program costs. This will make it harder to enter fields such as law, medicine, nursing, and STEM—areas where women and underrepresented groups are still striving for equal representation.



Without safeguards, many will be forced into high-cost private credit lacking consumer protections and eligibility.

Public	Service	Loan	Forgiveness	(PSLF)
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We urge the Department to carefully consider its implementation of new limits on graduate and parent borrowing and to ensure minimal disruption for students currently enrolled in programs. Transition rules must provide clear, affordable pathways for these students to complete their education without being forced into high-cost private loans that lack borrower protections and eligibility for PSLF.

**Borrowing Caps.** Fixed caps that do not reflect real program costs will exclude students with fewer family resources—disproportionately women and students of color—from degrees that increase lifetime earnings. Women already borrow more due to wealth gaps and caregiving responsibilities, and the gender pay gap means they repay more slowly, carrying higher lifetime debt. Caps must reflect actual tuition and expenses, include hardship waivers, and be paired with equity impact reporting.

**Repayment Plan Simplification.** Simplifying repayment options could help borrowers, but the new Repayment Assistance Plan (RAP) must be designed to ensure affordability and fairness. Payments must be income-sensitive, predictable, and structured to prevent ballooning lifetime costs. Without clear communication and strong servicer standards, women and borrowers of color—already disadvantaged by wage inequities—will face greater repayment risks.

**Loan Rehabilitation and Hardship Protections.** Allowing a second rehabilitation acknowledges real financial setbacks, but eliminating unemployment and hardship deferments without adequate alternatives will leave vulnerable borrowers unprotected. Minimum payment standards must reflect income realities, and borrowers who leave school without completing a degree—already at highest risk of default—must retain meaningful safeguards.

### **Issues Related to the AHEAD Committee**

**Workforce Pell Grant Expansion.** The Pell Grant Program is the cornerstone of college affordability, and preserving its value is critical to ensuring low- and middle-income students—especially women and students of color—can access higher education. However, expanding Pell to short-term programs of 8–15 weeks carries serious risks. Evidence shows that these short-term credentials often produce low or no wage gains, with women and students of color experiencing the weakest returns. Research also demonstrates that predatory for-profit providers and Online Program Managers have a track record of exploiting students by offering high-cost, low-quality programs that yield poor outcomes

To fulfill its promise, Workforce Pell must include robust quality assurance and accountability measures. The Department should require reliable data on program completion and job placement rates, prohibit outsourcing to unaccredited entities, and bar for-profit providers with histories of fraud or poor performance from accessing funds. Expanding Pell without these safeguards risks diverting scarce federal dollars away from students who need them most, further eroding Pell’s already diminished purchasing power.

**Institutional Accountability.** Disqualifying programs with “low-earning outcomes” risks penalizing essential fields like nursing, social work, and counseling—professions undervalued in wages but critical to communities. Women, particularly women of color, are concentrated in these careers. Accountability rules



must be designed to recognize the social and economic value of these fields and avoid cutting off access to education that prepares students for indispensable roles in the care economy.

### **Advancing Gender Equity**

Women hold a majority of the nation's outstanding student loan debt, borrow more at nearly every degree level, and repay more slowly due to the persistent gender pay gap. Black women and Latinas carry especially high burdens, while student parents—predominantly women—face added challenges balancing caregiving and repayment. Without intentional safeguards, new regulations will deepen these inequities rather than reduce them. To avoid deepening inequities, AAUW urges the Department to:

- **Disaggregate and Publish Data** on enrollment, persistence, debt, and repayment by gender, race, income, and parenting status.
- **Protect Student Parents** by aligning borrowing and repayment structures with the realities of caregiving, and by supporting access to campus-based childcare.
- **Strengthen Servicer Standards** with plain-language disclosures, proactive outreach, and automatic enrollment in affordable repayment plans when borrowers miss payments.
- **Consumer-Test Borrower Communications** with women, first-generation students, and student parents to ensure clarity and usability.
- **Ensure Smooth Transitions** to new plans with hold-harmless protections against delinquency or default.

### **Conclusion**

We strongly urge you to commit to a transparent and inclusive rulemaking process. AAUW calls on the Department to adopt regulations that advance gender and racial equity, expand opportunity, and protect affordability for all borrowers. We stand ready should you require additional information.

Sincerely,

A handwritten signature in purple ink that reads "Meghan Kissell".

Meghan Kissell, MSW  
Senior Director, Policy & Member Advocacy