

January 22, 2020

Mr. Robert King
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

RE: Docket ID ED-2019-FSA-0115-0001
(Comments submitted electronically via Regulations.gov)

Dear Mr. King:

We respectfully share the following comments on behalf of The Institute for College Access & Success (TICAS), a non-profit, nonpartisan organization that conducts research and advocacy for student-centered public policies that promote affordability, accountability, and equity in higher education.

We applaud the Administration's decision to carry out this rulemaking to automate the student loan discharge process for certain veterans with a total and permanent disability (TPD). We further urge the Administration to automate this process for the tens of thousands of additional totally and permanently disabled individuals — including veterans not matched through the Veterans Affairs (VA) database — who are matched through Social Security Administration (SSA) data.

These individuals are legally entitled to debt relief, but many borrowers, in applying for relief, face significant challenges clearing the administrative hurdles currently in place. As President Trump noted in his announcement of the Administration's intent to automate the process for VA-matched borrowers, the process "has been overly complicated and difficult" and "has inflicted significant hardship and serious harm."

In addition, by limiting the scope of automatic discharges to only those identified in the VA match, many veterans will still be excluded from automatic forgiveness. This is because not all veterans have a service-connected disability that is 100 percent disabling or an individual un-employability rating.

We urge the Department to exercise its existing authority to expand its automatic loan discharge to TPD borrowers receiving Social Security Disability Insurance or Supplemental Security Income benefits.

Thank you for your attention to this important matter.

Sincerely,

Michele Streeter
External Affairs & Policy Analyst