



WASFAA

Western Association of Student Financial Aid Administrators

September 12, 2017

Re: ED-2017-OS-0074-0001 Request for Comment

The Western Association of Student Financial Aid Administrators (WASFAA) represents over 600 financial aid professionals in Alaska, Arizona, California, Hawaii, Idaho, Nevada, Oregon, Washington and the Pacific Islands. Our mission includes advancing access and choice to higher education through the administration of student financial assistance programs.

To advance this mission we would like to provide the Department of Education this input on regulations that may be appropriate for repeal, replacement, or modification. A detailed chart has been provided to address the current obligation, issue/problem and proposed resolution. The areas we are addressing are summarized below:

- #1 – Stop treating previously defaulted loans that have been paid-in-full without going through the loan rehabilitation process as in default in schools' Cohort Default Rate (CDR) calculation.
- #2 – Stop treating the loans of borrowers who passed away prior to their loans entering default as a default in a schools' CDR calculation.
- #3 – Allow and encourage institutions to design and mandate additional debt management and financial literacy campaigns in ways that are most effective for their student populations.
- #4 – Simplify the Subsidized Usage Limit Applies (SULA) regulations to make them less confusing and easier to implement. We suggest having students, servicers, members of the financial aid community, and the Department work together in this effort.
- #5 – Count borrowers' pre-consolidation payments for their consolidated loans toward the maximum repayment period of 10 years and 120 payments for Public Student Loan Forgiveness (PSLF)
- #6 – Require the Internal Revenue Service (IRS) to enforce its tax return filing status regulations by asking filers for their marital status and, for married couples, whether they lived together for more than 6 months during the tax year.
- #7 – Replace the current Return to Title IV (R2T4) requirement to perform complex calculations of the kinds and amounts of federal aid to return with a simple proration of federal aid to return.
- #8 – Eliminate administratively burdensome and complicated requirements unrelated to the administration of Title IV funds, such as security and fire safety reporting, voter registration communications, and recognizing Constitution Day.
- #9 – Allow students/families who received public benefits to skip the income questions on the Free Application for Federal Student Aid (FAFSA), and have an automatic-zero Expected Family Contribution (EFC) calculated, since their high financial need can be assumed.

#10 Eliminate the requirement to verify non-filing status using IRS documentation. The use of Prior-Prior Year (PPY) income data makes this requirement unnecessary.

If you have questions or require additional information, please feel free to contact one of the WASFAA representatives listed below. We appreciate the opportunity to submit these views for institutions and students in the Western region.

Best Regards,

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