

May 28, 2021

U.S. Department of Education, Office of Federal Student Aid

830 First Street, NE

Washington, DC 20202-5320

Attn: Brenda Vigna, Division Chief

Dear Ms. Vigna:

We are providing comments on the May 6, 2021, Federal Register Notice (Docket ID ED-2021-FSA-0011) concerning the new Computer Matching Agreement (CMA) between the U.S. Department of Education (ED) and the U.S. Department of Veterans Affairs (VA).

We are extremely grateful that severely disabled veterans who are borrowers of Federal Perkins Loans, Direct Loans, Federal Family Education Loans (FFEL), Federal Insured Student Loans (FISL), and recipients of Teacher Education Assistance for College and Higher Education (TEACH) Grants are able to automatically apply for Total and Permanent Disability (TPD) discharges of their title IV loans or TEACH Grant service obligations.

Ensuring severely disabled veterans receive their statutory right to loan forgiveness is an important issue to veterans and military service organizations. In January 2020, twenty two leading Military and Veterans Service Organizations (MSO/VSOs) submitted a public comment<sup>1</sup> to ED thanking them for moving forward with a process to ensure totally and permanently disabled (“TPD”) veterans’ legal right to loan forgiveness is honored. The letter also requested that ED keep the process running smoothly and alert MSO/VSOs of any delays (given media reports at the time of a delay), alert veterans to the state tax implications; and – most important – make whole those veterans who were wrongly put in default on loans that should have been forgiven, impacting their VA benefits, tax refunds, and access to credit. MSO/VSOs previously wrote to the Department requesting its action to ensure loan forgiveness for disabled veterans in 2018.<sup>2</sup>

When servicemembers raise their right hands to take an oath to defend this nation, they are writing a check payable up to and including their lives. America must do the right thing by

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<sup>1</sup> Available at <https://vetsedsuccess.org/22-veterans-military-organizations-letter-to-education-department-re-disabled-veterans-loans/>

<sup>2</sup> Available at <https://vetsedsuccess.org/letter-to-the-education-department-regarding-disabled-veterans-right-to-loan-forgiveness/>

veterans with 100 percent service-connected disability ratings or individual unemployability designations.

The proposed CMA between ED and VA will ease the process to forgive federal student loans for veterans whose service results in either a 100 percent disability rating by VA or in a determination a veteran is “individually unemployable” (which can happen when a veteran has a disability rating as low as 60 percent). For these purposes, achieving a complete match rate is crucial. Both ED and VA should ensure that the precedent of this CMA advances its purposes related to expanding the Total and Permanent Disability (TPD) discharge for eligible veterans.

The CMA will result in notices being sent to borrowers who have a 100 percent VA disability rating or are designated individually unemployable, informing them that ED will discharge the borrower’s Title IV loans or TEACH Grant service obligations no earlier than 61 days from the date that ED sends the notification to the borrower, unless the borrower chooses to have their Title IV loans or TEACH Grant service obligations discharged earlier or chooses to opt out of the TPD discharge within 60 days from the date that ED sends the notification. Making sure that the addresses of federal student loan holders are constantly updated will be crucial.

Again, we thank you for this program and urge that you make every effort to find severely disabled veterans who are eligible to have their federal student loans forgiven.

Sincerely,

Veterans Education Success