

May 16, 2022

PRA Coordinator of the Strategic Collections  
And Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave. SW, LBJ, Room 6W208D  
Washington, DC 20202-8240

Re: William D. Ford Federal Direct Loan Program Promissory Notes and Related Forms,  
OMB Control Number: 1845-0007

Dear Sir or Madam,

Thank you for the opportunity to comment on the continued collection of information associated with the Direct Loan Program. The undersigned veteran and military service organizations represent millions of current and former service members, their families, and survivors. We write to you today with recommendations for changes to the 'Master Promissory Note' to improve the transparency of the Direct Loan Program.

Many members of our community report that they have student loans they never authorized or knew about, or that they were forced to take out loans midway through their education program despite being promised that their GI Bill benefits would cover all tuition.<sup>1</sup> It is an issue of such concern that the U.S. Department of Education recently issued a bulletin on the subject. The bulletin specifically provides notice to schools that the Department is closely monitoring complaints of substantial misrepresentations associated with GI Bill benefits and student loans.<sup>2</sup>

We believe there are straightforward policy solutions to help mitigate these harms.<sup>3</sup> The Master Promissory Note should be given a more accessible, common-sense name or subtitle, such as "Student Loan Agreement," so that students understand they are signing a contract to repay a student loan. Because legal language is not often accessible to students, the Master Promissory Note should also begin with a large image of a stop sign with a common-sense warning such as, "Stop: Do not sign this unless you want student loans. You will have to pay back the loans."

Furthermore, for students with fully-funded veterans education benefits, we recommend you require an *annual* renewal of any Master Promissory Note – versus the current approved period of 10 years – to ensure the students truly do want new loans each year. For these fully-funded students, we also recommend you require financial counseling regarding any loans, including the amount and repayment obligation, in the presence of a witness not connected with the institution, to ensure students don't unwittingly take on loans. Thank you for your consideration of these ideas.

---

<sup>1</sup> See *Veterans with Student Loans They Never Authorized or Wanted*, Veterans Education Success (Mar. 15, 2022), <https://vetsedsuccess.org/veterans-with-student-loans-they-never-authorized-or-wanted/>.

<sup>2</sup> FSA Enforcement Bulletin, March 2022 – *Substantial Misrepresentations When Recruiting Servicemembers and Veterans*, Mar. 16, 2022, <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2022-03-16/fsa-enforcement-bulletin-march-2022-substantial-misrepresentations-when-recruiting-servicemembers-and-veterans>.

<sup>3</sup> See Letter from 37 Veterans and Military Organizations to Congress sharing their priorities for a Higher Education Act Reauthorization, May 2, 2019, <https://vetsedsuccess.org/37-veterans-and-military-service-organizations-write-congress-to-share-our-priorities-for-higher-education-act-reauthorization/> (page 6 includes recommendations about the master promissory note).

Sincerely,



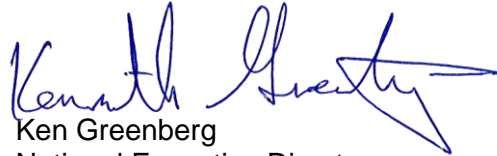
Luis A. Vasquez-Contes  
National Commander  
American GI Forum of the United States



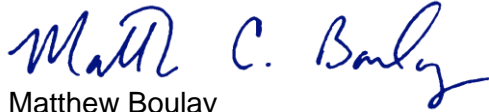
Jeremy Butler  
Chief Executive Officer  
Iraq and Afghanistan Veterans of America



Kathy Roth-Duquet  
President  
Blue Star Families



Ken Greenberg  
National Executive Director  
Jewish War Veterans of America



Matthew Boulay  
Director  
Campaign to Protect Student Veterans



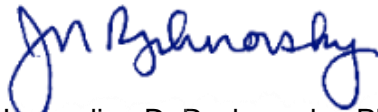
Rebecca I. Porter, PhD  
President and CEO  
Military Child Education Coalition



Michael Little  
Executive Director  
Chief Warrant and Warrant Officers Association,  
US Coast Guard



Michelle Hill, MBA, MSA  
President  
National Association of State Approving Agencies



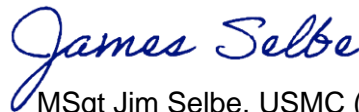
Jacqueline D. Rychnovsky, PhD, RN, FAANP, CAE  
CAPT (ret.), Nurse Corps, USN  
Executive Director  
Commissioned Officers Association of the USPHS



Besa Pinchotti  
Executive Director & CEO  
National Military Family Association



Chris Slawinski  
National Executive Director  
Fleet Reserve Association



MSgt Jim Selbe, USMC (Ret)  
Chief Operating Officer  
Service to School



Captain Lory Manning, USN (Ret.)  
Director of Government Operations  
Service Women's Action Network



Thomas Bandzul  
Legislative Counsel  
Veterans And Military Families For Progress



Amy Fairweather  
Director of Policy  
Swords to Plowshares



Carrie Wofford  
President  
Veterans Education Success



Bonnie Carroll  
President and Founder  
Tragedy Assistance Program for Survivors



Anthony Hardie  
National Chair & Director  
Veterans For Common Sense



Ryan Manion  
President  
Travis Manion Foundation



Sharon Hodge  
Director for Policy and Government Affairs  
Vietnam Veterans of America