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.\(^1\) 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.\(^2\)

We believe there are straightforward policy solutions to help mitigate these harms.\(^3\) 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.

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\(^1\) 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/](https://vetsedsuccess.org/veterans-with-student-loans-they-never-authorized-or-wanted/).


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
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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
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<thead>
<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Captain Lory Manning, USN (Ret.)</td>
<td>Director of Government Operations, Service Women’s Action Network</td>
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<td>Thomas Bandzul</td>
<td>Legislative Counsel, Veterans And Military Families For Progress</td>
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<td>Amy Fairweather</td>
<td>Director of Policy, Swords to Plowshares</td>
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<td>Carrie Wofford</td>
<td>President, Veterans Education Success</td>
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<td>Bonnie Carroll</td>
<td>President and Founder, Tragedy Assistance Program for Survivors</td>
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<td>Anthony Hardie</td>
<td>National Chair &amp; Director, Veterans For Common Sense</td>
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<td>Ryan Manion</td>
<td>President, Travis Manion Foundation</td>
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<td>Sharon Hodge</td>
<td>Director for Policy and Government Affairs, Vietnam Veterans of America</td>
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