

August 2, 2017

Dr. Joseph Conaty
Delegated the functions and duties of the Deputy Secretary
Co-Chair of the Agency Reform Taskforce
U.S. Department of Education

RE: Executive Order 13781 of March 13, 2017(Comprehensive Plan for Reorganizing the Executive Branch)

Dear Dr. Conaty:

On behalf of the Council of Graduate Schools (CGS), I appreciate this opportunity to provide comments to the Department of Education regarding Executive Order 13781 of March 13, 2017 (Comprehensive Plan for Reorganizing the Executive Branch). CGS membership includes approximately 500 universities in the United States that annually award the vast majority of U.S. master's degrees and research doctorates.

CGS appreciates the Department's efforts to ensure that it best serves the needs of America's students, families, and educators by providing educational excellence and equity. However, we would like to offer several suggestions on how to better serve graduate students, including: better, more nuanced benchmarking; more transparent federal student loan information; simplified and equitable repayment options; and more relevant specified areas of national need in the Graduate Assistance in Areas of National Need (GAANN) program.

CGS encourages the Department to expand the Integrated Postsecondary Education Data System (IPEDS) and collect data that are more reflective of the master's and doctoral education community. IPEDS is an important data tool for the higher education community and offers basic data points for enrollment, degrees conferred, jobs created, and dollars spent by U.S. postsecondary institutions. However, we observe that IPEDS data collection efforts have continued to place their emphasis on undergraduate education. Particularly, when it comes to enrollment data, IPEDS, in its current form, does not offer a nuanced benchmark for this community.

To enhance the quality, utility, and clarity of the information to be collected, the Department should consider disaggregating federal student loan information by degree type so that the data are representative of distinctions among master's, doctoral, and professional degrees. Borrowing patterns across master's, doctoral, and professional borrowers, as well as income potential upon completion of these degrees, differ widely. Information that aggregates graduate and professional borrowers into one category lacks the distinctiveness needed to inform policy and practice around graduate student loans.

A F F I L I A T E S

Conference
of Southern
Graduate Schools

Northeastern
Association
of Graduate Schools

Midwestern
Association
of Graduate Schools

Western
Association
of Graduate Schools

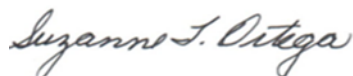
Additionally, providing students with complete, full and transparent information on federal student loans will allow them to make more informed decisions with respect to borrowing and repayment. CGS encourages the Department to allow colleges and universities to require additional loan counseling beyond what is mandated by the law. Under current law, if graduate students have borrowed as undergraduates, there is no requirement for colleges and universities to provide them with additional loan counseling, even though loan and repayment terms for undergraduates and graduates differ substantially. We suggest that at each transition point in a student's progression through postsecondary education, counseling that reflects the changes in circumstances and the differences in the types of financial assistance they may be eligible for should be provided. At a minimum, we believe that loan counseling should be provided when a student enters graduate school for the first time.

Further, CGS believes that some of the current income-driven repayment (IDR) plans are placing an additional burden on graduate students by increasing their cost of borrowing federal student loans. The Revised Pay as You Earn (REPAVE) plan places any person who has borrowed toward their graduate education into a 25-year repayment period without consideration of the total amount borrowed or ability to repay. This provision makes the repayment scheme a degree-based repayment plan. IDR plans should be based on one's discretionary income and amount borrowed. We suggest that the variables to consider in an income-based plan are the amount of income sheltered and the percentage of discretionary income used to determine the payment.

Another area which CGS encourages the Department to reevaluate is the Graduate Assistance in Areas of National Need (GAANN) program. GAANN has been successful in allowing low income individuals to pursue graduate degrees in occupations that help our nation stay internationally competitive. However, areas of national need must keep up with the fast pace of changing innovation, technology and the economy. CGS suggests that the Department, on a regular basis, update the areas of national need to ensure our national security, global competitiveness, and the demands of the 21st century workforce.

Lastly, graduate and undergraduate students are at varying stages of their lives and may have different sets of needs. CGS urges the Department to remain cognizant of these factors not only as they pertain to federal student loan borrowing and repayment, but also other areas including mental health and Office of Civil Rights issues. Furthermore, as the only national organization that represents master's and doctoral education in the United States, we encourage the Department of Education to think of CGS as a resource when considering matters that impact graduate education, graduate students, and advanced degree holders.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne T. Ortega".

Suzanne T. Ortega
President