

ICR Number 1845-0129 – Adverse Credit Reconsideration Loan Counseling - ED-2024-SCC-0026  
 60D Comment Response Table

Comment #	Commenter Name	Comment	FSA Response	Change to ICR or Form
0004	Anonymous	<p>The adverse credit history provision should be updated to include not just prior credit history, but predictive analytics based on many of the same factors being used to justify loan cancellation under the concept of hardship in this week’s negotiated rulemaking session. The factors that justify cancelling a loan under hardship, many of which can be identified in advance or predicted with reasonable accuracy (such as typical student outcomes based on the program or institution a student is attending, or someone's debt to income ratio) should be the same reasons used to prevent origination of a PLUS loan in the first place (e.g. If almost no borrowers from an institution make any principal payments on their loans, those schools probably should not be given the loans. Likewise, if older borrowers are considered inherently at risk, why are we giving PLUS loans to those close to retirement with no income or assets?). If someone faces a likely hardship with repayment, a waiver should not be a way to get around that. This amounts to acknowledging that someone is unlikely to repay but giving out the loan anyway. That is not just irresponsible, but just plain bad lending. As an example, a student with over \$300,000 in student loans from multiple online schools over many years, with little career advancement and little or no principal payments should not be able to borrow more simply because they fill out a waiver.</p>	<p>Altering the regulations governing adverse credit history is not within the scope of this information collection.</p>	No changes
0005	jorgeelicerramirezwacao	<p>SBA provides low-interest loans to help businesses and homeowners recover from declared disasters.</p>	<p>This comment is outside the scope of the information collection.</p>	No changes
0006	Nguyen-Huynh COOP	<p>Below are comments for the proposed extension of the information collection request (ICR) for PLUS Adverse Credit</p>	<p>The Department acknowledges the recommendations made by</p>	No changes

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		<p>Reconsideration Loan Counseling. My feedback, while focused on the PLUS Adverse Credit Reconsideration Loan Counseling, resonates with broader educational and institutional accountability issues that intersect with the principles being considered in LSC's proposed rules Parts 1621 &amp; 1624 Rulemaking notice for comments.</p> <p>On Equity and Institutional Oversight: Equitable oversight must transcend mere compliance and penalty; it should seek to uncover systemic disparities and promote best practices. The cycle of enrollment and graduation, leading to another generation of debt-laden borrowers, needs urgent reform. Institutions, regardless of their current outcomes, must be part of a continuous improvement process, adopting strategies successful in peer institutions and aligning financial incentives with student success.</p> <p>Information Asymmetry and Incentive Misalignment: The asymmetric information between students and institutions, especially concerning federal loans and grants, significantly disadvantages minority and older students. This is further complicated when institutional rewards are based on enrollment rather than graduation rates, perpetuating a cycle that is not accountable for student outcomes.</p> <p>Proposal for Short-Term Risk Assessment: A crucial window exists between when schools report student enrollment and when students can no longer withdraw from classes without financial penalty. Scrutinizing4/17/24, 11:15 AM        blob:https://www.fdms.gov/0f453a3d-7dab-4e44-abf7-2f9fdb7272fb blob:https://www.fdms.gov/0f453a3d-7dab-4e44-abf7-2f9fdb7272fb 2/2        this period could reveal institutional practices that either support or hinder student success. Title IX and Title IV Correlation: There is a Legal Services Corporation's (LSC) Request for Information regarding the expansion of</p>	<p>the commenter; however, the recommendations are broader in scope than the issues raised by this information collection.</p>	
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		PLUS program call for a holistic and proactive approach. Institutional practices must be aligned with student welfare, and education must be seen as a collaborative investment in the future, not as a transactional relationship defined by enrollment numbers. Thank you for considering our perspective and comments.		
0007	WhoPoo App	<p>The of North Carolina public schools is very poor. Recently, Winston-Salem public school students were subject to a fit of rage from a student on a White teacher. The pupil repeatedly slapped his teacher in the face who showed no response, indicative of her being a victim of racial violence and hate. Racially charged diatribe was issued, indicating this student should be charged under 18 U.S.C. 249 for a hate crime. Please also charge the student as an adult, and undertake a thorough review of Winston-Salem schools to pinpoint whether racial hatred is common. It appears the student is used to getting away with this kind of behavior and no disciplinary action will be taken, which will not deter and instead encourage copycat attacks:</p> <p>Libs of TikTok on X: "Wild footage shows a student slap a teacher across the face twice while he taunts her. This reportedly happened at Parkland High School in Winston-Salem, North Carolina. The sheriff's office says they are investigating. <a href="https://t.co/LpTHGY6B40">https://t.co/LpTHGY6B40</a>" / X (twitter.com)</p> <p>Parkland High School acknowledges video of 'unsettling interaction' between student, teacher (msn.com)</p> <p>North Carolina: Teacher assaulted, WS/FCS investigating (wxii12.com)</p> <p>Video Shows Student Slap Teacher In The Face: 'You Want Me To Hit You Again?'   The Daily Caller</p> <p>Regarding Central Davidson High School in Lexington, a student was suspended for 3 days for using a term that is wholly accepted by federal and legislative bodies. "Illegal alien" is a term fully accepted and used by the DHS (</p>	This comment is outside the scope of the information collection.	No changes

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		<p>dhs.gov/sites/default/files/publications/18_1214_PLCY_pops-est-report.pdf ) as well as the CDC in its tracking of tuberculosis cases from Mexico to the United States. It has absolutely no racial undertones whatsoever and the fact that a well-meaning student was suspended for 3 days means his family should be completely reimbursed by Lexington NC for their damages.        4/17/24, 11:16 AM blob:https://www.fdms.gov/070afa17-2ddc-42aa-8211-39c0fae2b805        blob:https://www.fdms.gov/070afa17-2ddc-42aa-8211-39c0fae2b805 2/2        Student suspended for using term 'illegal alien' in English class (carolinajournal.com)        Student Suspended For Using Term 'Illegal Alien' In English Class   JoCo Report</p>		