American Association
of Colleges of Nursing

January 30, 2023

Assistant Secretary Nasser Paydar
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202

RE: Improving Income-Driven Repayment for the William D. Ford Federal Direct Loan Program [Docket ID ED-2023-OPE-0004]

Dear Assistant Secretary Paydar,

The American Association of Colleges of Nursing (AACN) appreciates the opportunity to comment on the proposed rule, Improving Income-Driven Repayment for the William D. Ford Federal Direct Loan Program. As the national voice for academic nursing, AACN works to establish quality standards for nursing education; assists schools in implementing those standards; influences the nursing profession to improve health care; and promotes public support for professional nursing education, research, and practice. AACN represents more than 850 schools of nursing offering a mix of baccalaureate, graduate, and post-graduate programs at public and private universities nationwide, including 565,000 students and 52,000 faculty.[1]

AACN has a vested interest in improving our nation's health and health care. For over five decades, the association has championed professional nursing education to ensure that Registered Nurses (RNs) and Advanced Practice Registered Nurses (APRNs), including nurse practitioners, certified nurse-midwives, certified registered nurse anesthetists, and clinical nurse specialists, are prepared to provide evidence-based, cost effective, and high-quality care.

As our nation battles current and future public health challenges, access to nursing care and ensuring a strong nursing pipeline is essential. AACN commends the Department of Education for proposing to modify and restructure repayment plan initiatives through the Revised Pay as You Earn (REPAYE) plan and the regulations under the William D. Ford Federal Direct Loan program, as well as combining the Income Contingent Repayment (ICR) and the Income-Based Repayment (IBR) plans to create the Income-Driven Repayment (IDR) plan. This standard would increase access to affordable repayment terms and result in a more manageable repayment plan system.

A 2016 AACN survey found that 76% of nursing students took out a loan for their undergraduate degree (at that time the median amount of student loan debt was between $40,000-54,999), and 69% of graduate nursing students received federal loans[2]. The biggest concern borrowers had related to loan repayment was whether they would be able to afford monthly student loan payments once the grace period ended. The Bureau of Labor Statistics is projecting the need for RNs to increase 6% and for APRNs to increase 40% by 2031, representing the need for an

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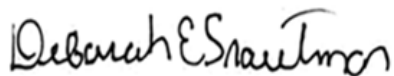[1] About the American Association of Colleges of Nursing. Retrieved from: https://www.aacnnursing.org/About-AACN
[2] American Association of Colleges of Nursing. (2016). *Graduate Nursing Student Loan Survey Analysis*

additional 225,600 jobs[3]. Data has shown that repayment plans need to be reinvented, especially for the nursing workforce, as this provides significant benefits for all communities, especially those in rural and underserved areas. Under the proposed regulations, borrowers would benefit from more affordable repayment options based on a faster pathway of payments made in multiple installments, the elimination of accumulating interest, and a longer grace period for making student loan payments. This transparency established for borrowers would enhance and ensure that the intent of modifying and restructuring of repayment plans is being fulfilled.

AACN supports these proposals as a means of ensuring that nursing pathways remain strong and lead to improvements in nursing education, workforce diversity, and retention so all can receive quality health care services. Thank you for your consideration of AACN's comments on this proposed rulemaking. This regulatory focus is timely, essential, and critical to improving our health system's efficiency, safety, and innovation. We appreciate your leadership to investigate these challenges and the opportunity to work with you and your colleagues in the administration to address them. Please consider AACN an ally in this endeavor. If our organization can be of any assistance, please contact AACN's Chief Policy and Scientific Officer, Dr. George Zangaro at Gzangaro@aacnnursing.org.

Sincerely,

Deborah Trautman, PhD, RN, FAAN
President and Chief Executive Officer

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[3] U.S. Bureau of Labor Statistics. (2022). Occupational Outlook Handbook- Registered Nurses. Retrieved from: https://www.bls.gov/ooh/healthcare/registered-nurses.htm