



May 11, 2026

The Honorable Nicholas Kent
Under Secretary of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Under Secretary Kent,

On behalf of the more than 29,000 financial aid professionals who are working to implement the student financial aid-related provisions of the One Big Beautiful Bill Act (OBBBA), also known as the Working Families Tax Cuts Act, we are writing to ask that the Department of Education (ED) provide flexibility to postsecondary education institutions while they seek to complete this complex implementation with limited guidance.

We understand and appreciate that the Department of Education is under immense pressure to implement sweeping changes to federal student aid policy under an unrealistic timeline set by Congress. ED has asked institutions for patience and grace as the Department fine-tunes the details of these sweeping changes and crafts final regulations. We ask that ED grant the same grace to institutions and provide for explicit flexibility in consideration of the exceptionally short time frame provided for implementation, which ED has determined allows them to bypass Higher Education Act (HEA) master calendar rules in order to meet the July 1, 2026, deadline Congress established in the law.

Colleges and universities are used to complexity. Financial aid administrators navigate some of the most intricate federal regulations in higher education, translating policy into practice so students can access the funding they need. But even the most seasoned professionals cannot implement rules on short notice and in the absence of subregulatory guidance to clarify areas of regulatory ambiguity.

That is exactly the position institutions find themselves in today. While the master calendar provides for eight months after a final rule is published for ED to issue guidance and training — and for financial aid offices to study and comprehend that guidance — we have just two. In place of official guidance to date, financial aid professionals have been relying on snippets of information gleaned from webinars and conferences, and through unofficial channels, much of

which has proven inconsistent and unreliable. Now that the RISE final rules have been published, we urge the Department to move quickly to provide detailed, official guidance. Without it, the implementation is at real risk. Institutions must make operational decisions now, often affecting millions of dollars in aid and the financial futures of thousands of students.

The Department's recent reversal on including Graduate PLUS loans under the new \$257,500 lifetime borrowing cap is a prime example of how unclear and inconsistent guidance is destabilizing financial aid administration — and putting students at risk. This was not a minor clarification. It is a fundamental shift in how borrowing capacity is calculated for graduate and professional students — many of whom have relied on Graduate PLUS loans to finance the full cost of their education. Perhaps more troubling is the way it was communicated: abruptly, inconsistently, and at a moment when institutions are already welcoming some students to campus, which only compounds the damage. And now, it is graduate and professional students who will bear the consequences, facing uncertainty about how much they can borrow and how to finance their education.

If the Department can bend on long-standing requirements, such as the master calendar that dictates the timeline for implementing new regulations, it can — and should — demonstrate similar flexibility in how it supports students and financial aid professionals. At a minimum, that means issuing clear, actionable guidance as early as possible. But more importantly, it means recognizing the untenable position institutions are in and providing immediate protections in instances where institutions, acting in good faith with limited information, may inadvertently make errors in calculating financial aid offers. In particular, the often manual and confusing methodology for the schedule of reductions to calculate loan eligibility for students attending less-than-full-time is likely to result in errors — despite aid professionals' best efforts.

Given the untenable timelines for institutions, providing 180 days of flexibility on the implementation of all provisions in effect on July 1, 2026, is warranted, but specific priorities for flexibility include:

- Applying the lifetime loan limit
- Adjusting loans for less-than-full-time enrollment
- Calculating the remaining time to credential for interim exception purposes

Offering program compliance and audit flexibilities would ensure that colleges acting in good faith — based on the best available information at the time — are not penalized for decisions made amid uncertainty or without official guidance. This is not a radical ask. It is a practical

safeguard in a moment when the normal rulemaking, implementation, and guidance processes are not functioning as they should.

Financial aid administrators want to get this right. They want to implement policy faithfully, equitably, and in a way that minimizes disruption for students and families. But they cannot do that without clear direction — and they should not be punished for the absence of it.

The Department of Education has a responsibility not only to set policy, but to ensure it can be implemented. Right now, that responsibility is falling short. Protecting institutions from the consequences of failing to adhere to rules that do not exist is not just warranted, but essential.

Regards,

A handwritten signature in black ink that reads "Melanie E Storey". The signature is written in a cursive style with a large, sweeping initial 'M' and a distinct 'E'.

Melanie Storey
President and CEO, NASFAA

CC: Richard Lucas, Chief Operating Officer, Federal Student Aid