

NASPAA Guide to Submitting Public Comments

Your voice matters. Help Shape the Future of Public Service Education



The U.S. Department of Education is accepting public comments on the [Reimagining and Improving Student Education \(RISE\) Initiative](#) until **March 2, 2026**.

Among other things, RISE proposes regulations to amend annual and aggregate loan limits for graduate, professional, and parent loan borrowers. Under this amendment, public service graduate degrees (MPA, MPP, MPAff, NPM, among others) do not qualify as professional degrees, limiting borrowing options for our students. As educators, researchers, and public service professionals, NASPAA members are uniquely positioned to provide meaningful input in the rulemaking process.

Why Commenting Matters

Public comments are not just suggestions—they are part of the **legal record** that agencies must consider. Substantive comments that include **data, personal stories, and specific recommendations** are especially powerful. They can:

- Influence final rulemaking decisions
- Serve as legal evidence if a rule is challenged
- Ensure that real-world impacts are considered

What to Include in Your Comment

To make your comment impactful, consider including:

- **Personal or institutional experiences** with the federal student loan system
- **Quantitative data** (e.g., number of students affected, loan amounts, completion rates)
- **Policy recommendations** or suggestions for improvement
- **Barriers** encountered by students, alumni, or staff
- **Equity concerns** or access issues

Tips for Writing an Effective Comment

- **Be specific** – General support is helpful, but detailed feedback is more influential.
- **Use evidence** – Include data, citations, or research findings.
- **Tell a story** – Personal narratives illustrate real-world impact.
- **Stay professional** – Comments become part of the public record.
- **Focus on the rule** – Address the proposed changes directly.

How to Submit a Comment

Watch this short video tutorial:

 **How to Submit a Comment on Regulations.gov** ([video](#))

Then follow these steps:

1. Go to [Regulations.gov](#)
2. Search for the RISE docket or use the direct link provided in NASPAA communications.
3. Click “Comment” and fill out the form.
4. Attach supporting documents if needed.
5. **Submit before the deadline (March 2, 2026)**

Template Letter for Public Comment

Subject: Public Comment on the Reimagining and Improving Student Education (RISE) Initiative

To Whom It May Concern:

I am writing as a [insert role: faculty member, administrator, student, alum] at [insert institution name] to provide comments on the proposed changes to the federal student loan system under the Reimagining and Improving Student Education (RISE) Initiative.

Federal student loans are a vital tool for encouraging and sustaining careers in public service. It has helped countless individuals pursue meaningful work in government, nonprofit, and education sectors without being burdened by unmanageable student debt.

Personal Experience or Institutional Impact:

[Insert a brief story or example of how federal student loans have impacted you, your students, or your institution. For example: "At our school, over 60% of MPA graduates enter public service roles. Federal student loans have been a key factor in their decision to pursue this degree."]

Data and Evidence:

Include any relevant data, such as:

- Number of students enrolled in public service graduate programs
- Average student debt load

Recommendations:

I respectfully urge the Department to consider the following improvements:

1. Include the public service field (MPA, MPP, MPAff, MNPM, and other variations) in the list of professional degrees.
2. Review the definition of professional degree outlined in [34 CFR 668.2](#)
3. Ensure equitable access to federal student loans for all public service professionals, including nonprofit workers

Thank you for the opportunity to comment. I appreciate the Department's commitment to improving graduate student education and ensuring it continues to serve those who dedicate their careers to public service.

Sincerely,

[Your Full Name]

[Your Title/Role]

[Institution Name]

[City, State]

[Email Address]