



SCHOLARS
STRATEGY NETWORK

This Proposed Rule will Disproportionately Harm Black and Latinx Student Borrowers

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Dear Secretary McMahon,

Thank you for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) titled “Reimagining and Improving Student Education,” published in the *Federal Register* on January 30, 2026 (91 Fed. Reg. 4254).

I am a leading scholar of debt and wealth inequality and a Professor of Public Policy at the University of North Carolina at Chapel Hill. My research program has been dedicated to understanding how structural inequalities shape financial security, social mobility, and family dynamics, with a particular focus on racial disparities in student debt and the reproduction of the racial wealth gap through consumer lending. I am the co-author of *A Dream Defaulted: The Student Loan Crisis Among Black Borrowers* (Harvard Education Press, 2022), which centers the lived experiences of Black borrowers within the broader student debt landscape.