



UNIVERSITY OF CALIFORNIA

—
Ahmet Palazoglu
Chair, Assembly of the
Academic Senate
Faculty Representative,
UC Board of Regents

Academic Senate

Office of the President
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Oakland, CA 94607

senate.universityofcalifornia.edu

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January 30, 2026

Yvette Gullatt
Vice President & Vice Provost
Graduate, Undergraduate and Equity Affairs

Re: Systemwide Review of Proposed Revisions to Presidential Policy on
Education Loan Practices

Dear Vice President & Vice Provost Gullatt:

As requested, I distributed for systemwide Academic Senate review the proposed revisions to the Presidential Policy on Education Loan Practices. Nine Academic Senate divisions and one systemwide Senate committee ([UCPB](#)) submitted comments. These were discussed at the Academic Council's January 28, 2026 meeting, and the compiled feedback is attached for your reference.

The revisions respond to clarification from the Consumer Financial Protection Bureau (CFPB) that its supervisory authority over private education loan practices extends to higher education institutions offering private education loans, as defined in Section 140 of the Truth in Lending Act, which already encompasses loans, Income Share Agreements, billing plans, and similar arrangements. Based on this guidance, UC Legal recommended policy updates to explicitly include programs that provide an extension of credit, namely deferred tuition plans.

At present, UC Davis's pilot deferred tuition program is the only one in the UC system that meets the definition of a private education loan. Under this plan, students repay the deferred amount without interest after graduation or otherwise terminating their course of study, with repayment contingent on the student earning more than a specified amount per month.

General support: Senate reviewers broadly support the proposed revisions as appropriate to ensure compliance with CFPB guidance. Several reviewers characterized the revisions as largely technical or clarifying, noting their limited immediate impact on most campuses. Reviewers also emphasized the importance of clear implementation and oversight should deferred tuition plans expand in the future.

Clarity and consistency: Multiple reviewers recommended clarifying key terms, including repayment thresholds tied to post-graduation income and expectations for “regular reporting” to UC Office of the President (UCOP). In addition, reviewers requested clarification of specific definitions, including the meaning of “retail installment contract” in the definition of “Deferred Tuition Plan.” Suggested enhancements included specifying reporting intervals and identifying core performance metrics, such as participation levels, repayment outcomes, complaints, and equity-related impacts. UCPB and some divisional reviewers noted that a short appendix or illustrative guidance could help promote consistent application if additional deferred tuition programs are developed.

Reviewers emphasized the importance of clear disclosures, plain language, and consistent terminology, including clearer distinctions between “lenders” and UC loan or credit products, improved naming conventions to avoid student confusion, and expansion of disclosed financial terms to include items such as capitalization of interest, payment frequency, prepayment options, grace periods, and forbearance. Several emphasized preserving clear communication of borrower rights under the Truth in Lending Act, including rescission periods.

Equity and student impacts: Several reviewers highlighted the need to monitor potential disparate impacts of deferred tuition plans on low-income and first-generation students if such programs expand. Suggestions included translating key loan materials into commonly spoken languages, incorporating regular borrower feedback through surveys, and reporting equity-related outcomes. Some committees raised concerns about behavioral incentives and moral hazard, noting that income-contingent repayment thresholds could influence student decision-making in unintended ways.

Fiscal risk and implementation considerations: Several reviewers raised fiscal risk considerations, particularly regarding inflation, interest-rate risk, and the long-term financial implications of offering interest-free deferred tuition. These reviewers encouraged UCOP to monitor costs and repayment outcomes carefully, especially if deferred tuition plans are expanded beyond a limited pilot.

Finally, several comments addressed internal consistency and implementation details, including clarification of approval authority, consistent use of the term “written approval,” clarification of what constitutes “appearing to promote” a lender, and correction of broken hyperlinks.

Thank you for the opportunity to comment on these proposed revisions.

Sincerely,



Ahmet Palazoglu
Chair, Academic Council

cc: Academic Council
Provost and Executive Vice President Newman
Associate Vice Provost Brick
Senate Division Executive Directors
Senate Executive Director Lin



320 STEPHENS HALL
UNIVERSITY OF CALIFORNIA

December 15, 2025

AHMET PALAZOGLU
Systemwide Academic Senate/Council Chair

Subject: Berkeley Division – Proposed Presidential Policy on Education Loan Practices

Dear Chair Palazoglu,

The proposed policy was disseminated to the Committee on Undergraduate Scholarships, Honors, and Financial Aid (CUSHFA). There are no comments from the Berkeley Division on the proposed *Presidential Policy on Education Loan Practices*.

Sincerely,

Mark Stacey
Chair, Berkeley Division of the Academic Senate

cc: Thomas Philip, Vice Chair, Berkeley Division of the Academic Senate
Monica Lin, Executive Director, UC Systemwide Academic Senate
Jocelyn Surla Banaria, Executive Director, Berkeley Division of the Academic Senate

UNIVERSITY OF CALIFORNIA, DAVIS

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(530) 752-2220
academicsenate.ucdavis.edu

January 21, 2026

Ahmet Palazoglu

Chair, Academic Council

RE: Proposed Revisions to Presidential Policy on Education Loan Practices

Dear Ahmet,

The proposed revisions to Presidential Policy on Education Loan Practices were forwarded to all standing committees of the Davis Division of the Academic Senate. Six committees responded: Graduate Council (GC), Planning and Budget (CPB), Undergraduate Council (UGC), and the Faculty Executive Committees of the College of Biological Sciences (CBS), College of Letters and Science (L&S), and the School of Medicine (SOM).

Committees express no objection to the proposed revisions, and GC and CPB provide a few comments and recommendations for consideration. GC notes that deferred tuition plans could benefit some graduate students if implemented carefully, particularly given budget constraints and potential federal reductions in research funding. In addition, GC suggests that implementation of Section III.D on “Deferred Tuition Plans” may be strengthened by greater specificity on operational expectations (i.e., a suggested interval for regular reporting to the UC Office of the President (UCOP) and what the report should include). GC adds that including brief list or short appendix could facilitate consistent application of the policy if additional deferred tuition programs are developed.

Regarding Sections II and III of the proposed revisions, CPB suggests including capitalization of interest, frequency of payments (number of payments per year), and prepayment options in the list of loan features discussed in Section II’s definition of “Financial terms,” and encourages the inclusion of options for grace periods, forbearance, and referrals in the first bullet of Section III.B.4. CPB also recommends including language that highlights the risks that may result from consolidation in Section III.C on “Alumni Associations” such as: “May not be eligible for original deferment and forbearance options” or “Might lose on-time interest rate reduction incentive if consolidated.” Lastly, CPB provides two recommendations for Section III.B.3: 1) CPB notes that “UC Preferred Private Loans” could be confused with “top-rated loans,” and encourages the use of clearer naming conventions, and 2) CPB suggests either revising the language in Section III.B.3 to state “preferred lender and loan list” rather than “preferred lender list,” or avoiding the use of “lender” and “loan” interchangeably.

The Davis Division appreciates the opportunity to comment.

Sincerely,

7/20/2023

Katheryn Niles Russ, Ph.D.
Chair, Davis Division of the Academic Senate
Professor of Economics
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Monica Lin, Executive Director, Systemwide Academic Senate
Michael LaBriola, Assistant Director, Systemwide Academic Senate
Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate

January 9, 2026

Kathryn Russ

Chair, Davis Division of the Academic Senate

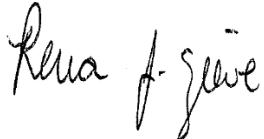
RE: RFC – Proposed Revisions to Presidential Policy on Education Loan Practices

The Committee on Planning and Budget (CPB) has reviewed and discussed the **RFC – Proposed Revisions to Presidential Policy on Education Loan Practices**. The committee voiced general support for the proposed revisions. However, with the goal of making the complex options as easy as possible for students and recent alumni to understand, they would like to also provide the following feedback:

- The committee suggested adding the following language to list of loan features in the “Financial Terms” of section II of the policy (p. 5) – “capitalization of interest, frequency of payments (number of payments per year), and prepayment options”.
- The committee suggests updating the language in Section III.B.3 from “preferred loan list” to “preferred lender and loan list” (p. 8). Alternatively, there could be more care not to use “lender” and “loan” interchangeably.
- The terminology “UC Preferred Private Loans” could easily be confused with “top-rated loans,” although the two describe almost opposite loan types. The CPB suggests using clearer naming conventions.
- The committee suggests including options for grace periods, forbearance, and referrals to the first bullet of section B.4. of the policy (p. 9).
- The committee suggests adding language to the “Alumni Associations” section that provides students with a clear warning that while some repayment options require consolidation there can also be risks to consolidation (p. 11). Some suggested language from the committee - “May not be eligible for original deferment and forbearance options” or “Might lose on-time interest rate reduction incentive if consolidate”.
- There should not be a comma in the new language “Any program or campus offering a deferred tuition plan must obtain prior approval from UCOP prior to offering such program, and must regularly report on the program’s performance to UCOP.” (p. 15).

CPB appreciates the opportunity to comment.

Sincerely,



Rena Zieve

Chair, Committee on Planning and Budget

January 5, 2026

Katheryn Russ

Chair, Davis Division of the Academic Senate

RE: Request for Consultation – Proposed Revisions to Presidential Policy on Education Loan Practices

Dear Chair Russ:

The Graduate Council - Graduate Student and Postdoctoral Scholar Welfare Subcommittee (GSPSW) has reviewed the RFC – Proposed Revisions to Presidential Policy on Education Loan Practices. Overall, the revisions read as a thoughtful and practical response to the CFPB guidance, and the added section on deferred tuition plans provides a clear framework for expanding (or piloting) these programs while maintaining student protections and UCOP oversight. It was noted that deferred tuition plans (implemented carefully) may benefit some graduate students, given budget constraints that may decrease availability of ASE positions and potential federal reductions in research funding. One suggestion to strengthen implementation would be to add a bit more specificity around the operational expectations in Section D, for example, what “regular reporting” to UCOP should include (e.g., participation volume, repayment outcomes, complaints/escalations, and any equity/access considerations) and a suggested interval (e.g., annual or semi-annual). Even a brief list or short appendix would help campuses apply the policy consistently if additional deferred tuition programs are developed.

Sincerely,

Maria L Marco

Maria Marco

Chair, Graduate Council - Graduate Student and Postdoctoral Scholar Welfare Subcommittee

January 9, 2026

Katheryn Russ

Chair, Davis Division of the Academic Senate

RE: Request for Consultation: Proposed Revisions to Presidential Policy on Education Loan Practices

Dear Kadee:

The Undergraduate Council (UGC) has reviewed and discussed the request for consultation for proposed revisions to the Presidential Policy on Education Loan Practices. The committee did not have any comments for the proposed revisions and were supportive of these edits.

Thank you.



David Kyle

Chair, Undergraduate Council

Proposed Revisions to Presidential Policy on Education Loan Practices

FEC: School of Medicine Committee Response

January 14, 2026

The SOM FEC requested feedback from the SOM (Health) Financial Aid Office on this RFC; this feedback was received - which FEC supports: more information on this loan type is necessary before determining if the SOM would offer it. Based on what is in the policy, it does not appear to be a loan the school would provide.

January 21, 2026

Ahmet Palazoglu
Chair, Academic Council

Re: Proposed Revisions to Presidential Policy on Education Loan Practices

The Irvine Division Cabinet discussed the proposed revisions to the Presidential Policy on Education Loan Practices at its meeting on January 20, 2026. The Council on Teaching, Learning, and Student Experience (CTLSE) and the Council on Planning and Budget (CPB) also reviewed the proposal. The councils' feedback is attached for your review.

Cabinet members added that they hope UCOP will consult with faculty experts in this area, for example, those affiliated with the [UC Irvine School of Law Student Loan Law Initiative](#).

The Irvine Division appreciates the opportunity to comment.

Sincerely,



Jane Stoever, Chair
Academic Senate, Irvine Division

Cc: Lisa Grant Ludwig, Chair Elect-Secretary
Jisoo Kim, Executive Director
Gina Anzivino, Associate Director

January 16, 2026

**JANE STOEVER, CHAIR
ACADEMIC SENATE, IRVINE DIVISION**

RE: Proposed Revisions to Presidential Policy on Education Loan Practices

At its January 14, 2025 meeting, the Council on Planning and Budget (CPB) discussed the proposed revisions to the Presidential Policy on Education Loan Practices.

The proposed revisions seek to align UC Policy with new federal regulations on private education loans and update UC's Educational Loan Practices policy to include programs that provide extension of credit, namely deferred tuition plans.

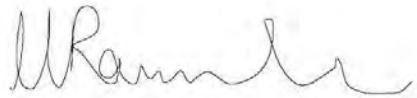
The Council noted that UCI does not offer "Deferred Tuition," but it offers the PACE Payment Plan which allows students to pay quarterly fees in three installments.

CPB offers the following comments for consideration:

- Regarding the proposed addition of the "Deferred Tuition Plan" to the policy, members expressed concern that the inflation and interest-rate risks have not been adequately considered. The deferred-tuition plan could prove significantly more costly for the University than expected in a scenario where inflation is higher than expected. Student payment of the tuition in the future with zero interest thus presents the risk of the University receiving far less real value than the original tuition amount. This risk is particularly concerning if current inflation and interest rate assumptions prove to be understated at the time the deferred payment plan is granted.
- Regarding the proposed revisions to the definition of a loan service provider (II. Definitions, p.2), similar concerns were raised. The changes aim to clarify language regarding the discretion of loan servicers. The language contemplates that loan servicers "may" have discretion to "approve deferrals and forbearances for borrowers on the lenders' behalf." This discretionary authority also carries inflation/interest-rate risk. CPB observed that more information is needed about the criteria for using this discretion. Additionally, members questioned whether limits should be placed on such discretion in the scenario where inflation is greater than expected.

The Council appreciates the opportunity to comment.

On behalf of the Council,



Maria Pantelia, Chair
Council on Planning and Budget

CC: Jisoo Kim, Executive Director
Gina Anzivino, Associate Director
Michelle Chen, CPB Analyst



December 12, 2025

**JANE STOEVER, CHAIR
ACADEMIC SENATE – IRVINE DIVISION****Re: Systemwide Proposed Revisions to Presidential Policy on Education Loan Practices**

Systemwide Senate Chair Palazoglu forwarded for systemwide Senate review proposed revisions to the Presidential Policy on Education Loan Practices.

The Council on Teaching, Learning, and Student Experience (CTLSE) discussed this issue electronically and at its meeting December 1, 2025, and members had the following comments and recommendations:

1. Members expressed concern regarding the level of detail outlined in this policy and questioned whether it may be creating an elaborate bureaucracy that manages lenders. Is such a bureaucracy already in place to administrate existing loan programs? Members further questioned whether that sort of management was appropriate for the University of California.
2. In Section II.Deferred Tuition Plan, it states “the student will be obligated to repay the amount deferred without interest after graduation or otherwise terminating their course of study, with repayment contingent upon the student earning more than a specified amount per month.” What is the policy if students’ earnings after graduation do not meet the specified threshold?
3. In Section II.Financial Terms, it is unclear why “any deferral provisions while enrolled” was included in addition to deferral provisions “after graduation.” It is our understanding that loans are always deferred while students are enrolled.
4. Some approvals are changed to be from Student Financial Support Unit and some remain from UC Legal. Is there a rationale for these differences, or should there be more consistency?
5. In Section III.B.6, it states: “No campus may promote or appear to promote any third-party lender or third-party loan product that has not been selected for inclusion on a UC preferred lender list pursuant to the criteria described in (2), above.” It is unclear what is defined by “appear to promote.”
6. All occurrences of “approval” should be revised to “written approval” for consistency.
7. In Section III.D, it states: “Any program or campus offering a deferred tuition plan must obtain prior approval from UCOP prior to offering such program, and must regularly report on the program’s performance to UCOP.” How often is “regularly?” What performance metrics should be reported?

Sincerely,

A handwritten signature in black ink that reads "Mary McThomas". The signature is fluid and cursive, with "Mary" on the top line and "McThomas" on the bottom line.

Mary McThomas, Chair
Council on Teaching, Learning, and Student Experience

CC:

Julie Kennedy, CTLSE Analyst
Academic Senate

Jisoo Kim, Executive Director
Academic Senate

Gina Anzivino, Associate Director
Academic Senate

Casey Lough, Assistant Director
Academic Senate



UCLA Academic Senate

Executive Board

January 20, 2026

Ahmet Palazoglu
Chair, UC Systemwide Academic Senate

Re: (Systemwide Senate Review) Proposed Revisions to Presidential Policy on Education Loan Practices

Dear Chair Palazoglu,

The UCLA divisional Executive Board (EB) reviewed the proposed revisions to Presidential Policy on Education Loan Practices and the committee/council feedback at their meeting on January 15, 2026. EB members agreed to share the enclosed comments from the divisional councils and committees for systemwide consideration.

Sincerely,



Megan McEvoy
Chair, UCLA Academic Senate

Encl.

Cc: Kathy Bawn, Immediate Past Chair, UCLA Academic Senate
 April de Stefano, Executive Director, UCLA Academic Senate
 Tim Groeling, Vice Chair/Chair Elect, UCLA Academic Senate

To: Megan McEvoy, Chair, Academic Senate, UCLA

Fr: Erin Debenport, Chair, College Faculty Executive Committee

Date: November 13, 2025

Re: **Response to the (Systemwide Senate Review) Proposed Revisions to Presidential Policy on Education Loan Practices.**

The College Faculty Executive Committee at UCLA appreciates the opportunity to comment on the (Systemwide Senate Review) Proposed Revisions to Presidential Policy on Education Loan Practices. After a review of the proposed policy updates, we offer the following suggestions and comments.

The committee agrees with the need to revise based on recent guidance from the federal Consumer Financial Protection Bureau's authority extending to higher education institutions that provide extension of credit, such as deferred tuition plans. While this currently only applies to a pilot program at UC Davis, the changes ensure student protection through conforming to federal rules.

As always, our membership appreciates the consultative process and welcomes the opportunity to participate in the discussion of important matters like this. You are welcome to contact us with questions.

College Faculty Executive Committee



OFFICE OF THE ACADEMIC SENATE
KEVIN MITCHELL, CHAIR, ACADEMIC SENATE
senatechair@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED
5200 NORTH LAKE ROAD
MERCED, CA 95343

December 12, 2025

To: Ahmet Palazoglu, Chair, Academic Council
From: Kevin Mitchell, Chair, UCM Divisional Council (DivCo)
Re: Presidential Policy on Education Loan Practices

The Presidential Policy on Education Loan Practices was circulated to the Merced Division Senate Committees and School Executive Committees for review. The committees listed below provided thoughtful feedback and raised a few points for consideration. Their comments are summarized in this memo, with full detail appended.

- Admissions & Financial Aid Committee (AFAC)
- Committee on Rules and Elections (CRE)
- Committee for Equity, Diversity, & Inclusion (EDI)
- Graduate Council (GC)
- Undergraduate Council (UGC)

On December 3, DivCo members discussed the committees' feedback and concluded that the policy is generally straightforward. The summary below highlights the central themes that emerged during the DivCo deliberations, and the range of perspectives offered across the committees.

AFAC agrees that the revisions more clearly explain how Loan Practices support students by providing clearer language about the loan process and the rights of student and parent borrowers. The committee sought clarification on one point:

- **III. Policy Text: A. “Campus utilization of University Loans” (p. 4)**
The provisions below apply to all practices related to University Loans.
1. The University must provide statements required by TILA to potential borrowers ~~in time for the potential borrowers to decline their loans, consistent with the underlying intent that TILA statements inform borrowers before they make a commitment to accept their loans~~ consistent with the timeframe provided under Regulation Z or any other applicable state or federal law.

AFAC expressed concern that removing language related to TILA-required statements may disadvantage students by omitting important information about borrowers' rights, particularly the

rescission period. AFAC urges the University to ensure this information remains clearly communicated rather than excluded.

CRE found the revisions generally consistent and clear. The committee requests clarification in the definition of “Deferred Tuition Plan” (p.2 of the policy), specifically the phrase “more than a specified amount per month,” which is ambiguous. Clearer and more concrete wording would improve the definition.

EDI emphasized the importance of supporting first-generation students and families whose primary language may not be English by providing translations of key loan materials, including the preferred lender list, rating system, and loan policies, into commonly spoken languages.

EDI also recommends specifying minimum frequencies for periodic policy reviews, including:

- Requests for Information (Section III.B.8)
- Assessments of systemwide and campus practices (Section III.B.10)
- Reports on Deferred Tuition Plan performance (Section III.D)

To strengthen transparency and program effectiveness, EDI suggests incorporating regular borrower feedback through surveys administered at key stages of the loan process. Surveys could measure clarity, satisfaction, perceived value, and likelihood to recommend, guiding ongoing improvements.

Finally, EDI noted that two links in Section VI (“The University of California Financial Aid Policy” and “Policy on Senior Management Group Outside Professional Activities”) are broken and requests that they be updated.

GC found the proposed revisions to be non-controversial but encouraged UCOP to monitor and report on the equity impacts and repayment outcomes of Deferred Tuition Plans if their use expands, given their potential disparate impacts on low-income and first-generation students.

UGC considers the policy revisions appropriate and necessary, adding Deferred Tuition Plans without affecting existing payment plans. UC Merced currently offers payment plans but no Deferred Tuition Plans; the only such plan in the UC system is a pilot for UC Davis MBA students, so the change is unlikely to impact undergraduates. The policy also outlines disclosure requirements, loan term limitations, and cancellation rights, though many may not apply to interest-free, fixed Deferred Tuition Plans. Other minor revisions are largely clarifying and are not expected to significantly affect UC Merced undergraduates.

The committees broadly support the proposed policy revisions, noting improvements in clarity, transparency measures, and student protections. Attention to TILA statement clarity, translations, periodic reviews, and student feedback will help enhance accessibility, equity, and effectiveness.

The Merced Division thanks you for the opportunity to comment on these proposed policy revisions.

CC: Divisional Council
 School EC Chairs
 Chairs of CAF, P&T, LASC
 UCM Senate Office
 UCOP Senate Office

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ACADEMIC SENATE, MERCED DIVISION
ADMISSIONS AND FINANCIAL AID COMMITTEE (AFAC)
JOEL SPENCER, CHAIR

UNIVERSITY OF CALIFORNIA, MERCED

November 17, 2025

To: Kevin Mitchell, Chair, Divisional Council
From: Admissions and Financial Aid Committee (AFAC)
Re: Presidential Policy on Education Loan Practices

At the November 17, 2025 AFAC meeting, members reviewed the *Presidential Policy on Education Loan Practices* and offer the following comments.

Overall, AFAC believes the revisions more clearly explain how Loan Practices support students' needs by providing clarifying language that better describes the loan process and rights of students and parents as borrowers.

However, AFAC seeks clarification on the following point:

III. Policy Text: A. “Campus utilization of University Loans” (p. 4)
The provisions below apply to all practices related to University Loans.

1. The University must provide statements required by TILA to potential borrowers ~~in time for the potential borrowers to decline their loans, consistent with the underlying intent that TILA statements inform borrowers before they make a commitment to accept their loans~~ consistent with the timeframe provided under Regulation Z or any other applicable state or federal law.

AFAC believes that the deletion of language from this section in the revised draft has the potential to disadvantage students by removing information necessary for students and parents to make informed financial decisions. Given that many may be unaware of borrowers' right to a rescission period, the University should ensure this information is clearly communicated rather than excluded.

AFAC thanks you for the opportunity to review and comment on the *Presidential Policy on Education Loan Practices*.

Cc: AFAC Members
Senate Office

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON RULES AND ELECTIONS (CRE)

UNIVERSITY OF CALIFORNIA, MERCED

November 25, 2025

To: Kevin Mitchell, Chair, Divisional Council (DivCo)
From: Committee on Rules and Elections (CRE)
Re: [Proposed Revisions to Presidential Policy on Education Loan Practices](#)

The Committee on Rules and Elections (CRE) reviewed the proposed revisions to the Presidential Policy on Education Loan Practices and finds the revisions to be consistent and clear overall. The committee offers the following comment.

II. Definitions – Deferred Tuition Plan (page 2 of the Policy)

“Under a Deferred Tuition Plan, the student will be obligated to repay the amount deferred without interest after graduation or otherwise terminating their course of study, with repayment contingent upon the **student earning more than a specified amount per month.**”

It is unclear what “**more than a specified amount per month**” means. Providing clarification or rewording this sentence with concrete details would make the definition clearer.

We thank you for the opportunity to review and comment.

CC: CRE Members
Senate Office



ACADEMIC SENATE, MERCED DIVISION
COMMITTEE FOR EQUITY, DIVERSITY AND INCLUSION (EDI)

UNIVERSITY OF CALIFORNIA, MERCED

November 24, 2025

To: Kevin Mitchell, Chair, Divisional Council (DivCo)

From: Sean Malloy, Chair, Committee for Equity, Diversity and Inclusion (EDI)

Re: Presidential Policy on Education Loan Practices

The Committee for Equity, Diversity and Inclusion (EDI) reviewed the proposed revisions to the Presidential Policy on Education Loan Practices and offers the following comments.

Availability of Translations

Many students within the University of California system are first generation whose first language, or first language of family members, may not be English. EDI suggests adding a stipulation that translations be provided with key information, such as a preferred lender list, rating system for the preferred lender list, and loan policies. Translations could include most commonly spoken languages, including Spanish, Mandarin, and Tagalog. This will assist students and their families in identifying the loans that best meet their needs.

Regular Reviews

EDI appreciates the inclusion of periodic reviews and recommends that some language be added to specify the (minimum) frequency at which this is to be performed for the following sections:

- Section III.B.8: Request for Information (RFI) (page 9 of the proposed revisions)
- Section III.B.10: Periodic review of systemwide and campus practices (page 9 of the proposed revisions)
- Section III.D: Regular report of the Deferred Tuition Plans performance (page 15 of the proposed revisions)

Explicit Borrower Feedback

While not the focus of the proposed revisions, EDI appreciates the transparency of helping students to identify and receive loans in Section B (pages 7-9 of the proposed revisions). The regulations on the University's preferred lender list is thorough in terms of assessing and communicating loans clearly. While this is effective, EDI believes that there is an opportunity for the process to be further strengthened by involvement and feedback of students, to allow for a way to measure the effectiveness of the program. This could be done through a regular survey of students throughout the loan process (or other financial aid options) based on key metrics (e.g. ease of understanding, satisfaction, perceived value, likelihood to recommend). This survey could be performed at regular intervals, such as yearly, or at stages such as at loan acceptance, 1-year mark, graduation, and full loan repayment. The results of the survey can be used to improve the loan practices and be made available to future potential borrowers to help them in making an informed decision.

Broken Links

In Section VI. Related Information (page 16 of the proposed revisions), the links to “The University of California Financial Aid Policy” and “Policy on Senior Management Group Outside Professional Activities” are both broken. EDI respectfully requests the links to be updated.

We thank you for the opportunity to review and comment.

Cc: EDI Members
Senate Office



ACADEMIC SENATE, MERCED DIVISION
GRADUATE COUNCIL (GC)

UNIVERSITY OF CALIFORNIA, MERCED

November 24, 2025

To: Kevin Mitchell, Chair, Divisional Council (DivCo)

From: Irene Beattie, Chair, Graduate Council (GC)

Re: Presidential Policy on Education Loan Practices

At their November 17, 2025 meeting, members of the Graduate Council (GC) reviewed the proposed revisions to the Presidential Policy on Education Loan Practices and offer the following comments.

GC found the proposed revisions to be non-controversial. In particular, the inclusion of deferred tuition plans, based on legal counsel's advice, was thought to be appropriate. GC also deemed the additional minor updates, intended to align the language with recent industry developments, to be reasonable.

Furthermore, GC encourages UCOP to monitor and report on the equity impacts and repayment outcomes of deferred tuition plans if their use expands, given their potential disparate impacts on low-income and first-generation students.

We thank you for the opportunity to provide feedback.

Cc: Graduate Council
 Senate Office

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ACADEMIC SENATE, MERCED DIVISION
UNDERGRADUATE COUNCIL (UGC)

UNIVERSITY OF CALIFORNIA, MERCED

November 18, 2025

To: Kevin Mitchell, Chair, Academic Senate

From: Susan Varnot, Chair, Undergraduate Council (UGC)

Re: Proposed Revisions to the Presidential Policy on Education Loan Practices

The Undergraduate Council (UGC) reviewed the proposed revisions to the *Presidential Policy on Education Loan Practices* and offers the following comments:

UGC believes the proposed policy change is appropriate and necessary, given the definition of a Private Education Loan found in both the UC Policy and Regulation Z. The change, which adds Deferred Tuition Plans to the policy, does not affect payment plans. UC Merced currently offers payment plans but does not have Deferred Tuition Plans. The only such plan identified within the UC system appears to be for online MBA students at UC Davis (referred to in the cover letter as a pilot program). Therefore, this change is unlikely to affect UC Merced undergraduates.

In addition, the document outlines the required disclosure paperwork and specifies limitations on changes to loan terms after approval, the right to cancel the loan, etc. Many of these requirements would not appear to apply to Deferred Tuition Plans, which are interest-free and have fixed, non-variable terms.

UGC also notes that, beyond the addition of Deferred Tuition Plan language, the policy includes numerous minor revisions throughout. These appear to be largely clarifying in nature and are not expected to have any significant impact on undergraduate students at UC Merced.

UGC thanks you for the opportunity to review and comment on the *Presidential Policy on Education Loan Practices*.

Cc: Senate Office
UGC Members

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CHAIR, ACADEMIC SENATE
RIVERSIDE DIVISION
UNIVERSITY OFFICE BUILDING, RM 225

Kenneth Barish
PROFESSOR OF PHYSICS AND ASTRONOMY
RIVERSIDE, CA 92521-0217
TEL: (951) 827-5023
EMAIL: kenneth.barish@ucr.edu

January 20, 2026

Ahmet Palazoglu, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: Proposed Revisions to Presidential Policy on Education Loan Practices

Dear Ahmet,

On January 12, 2026, the Riverside Academic Senate Executive Council discussed the subject proposal along with comments from tasked committees. Council had no comments to add to those submitted by local committees.

As you'll find from the attached memos, there are either no objections to and support for the proposal. Please note however, that the Riverside Committee on Planning and Budget had this question: *how does the deferral interact with future student loan eligibility (especially given recent changes to the financial aid system, which are impacting medical students)?*

We trust that this feedback has been helpful and that an answer will be provided to the above inquiry.

Sincerely yours,

A handwritten signature in blue ink that reads "Kenneth Barish".

Kenneth Barish
Professor of Physics and Astronomy and Chair of the Riverside Division

CC: Monica Lin, Executive Director of the Academic Senate
Cherysa Cortez, Executive Director of UCR Academic Senate Office



November 25, 2025

TO: Ken Barish, PhD, Chair, Academic Senate, UCR Division

FROM: Adam Godzik, Ph.D., Chair, Faculty Executive Committee, UCR School of Medicine

SUBJECT: **Systemwide Review] Proposal: *Proposed Revisions to Presidential Policy on Education Loan Practices***

Dear Ken,

The SOM Faculty Executive Committee has reviewed ***Proposed Revisions to Presidential Policy on Education Loan Practices***, which were primarily related to UC Davis's tuition deferral program and were approved by the Planning Budget Committee.

The FEC supports the revisions.

Yours sincerely,

DocuSigned by:

Adam Godzik, Ph.D.
Chair, Faculty Executive Committee School of Medicine
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College of Humanities, Arts, and
Social Sciences
EXECUTIVE COMMITTEE

December 5, 2025

TO: Ken Barish, Chair
Riverside Division of the Academic Senate

FROM: Iván Aguirre, Interim Chair
CHASS Executive Committee

RE: Proposal: Proposed Revisions to Presidential Policy on Education Loan Practices

The CHASS Executive Committee reviewed the proposed revisions and supported this proposal with no specific feedback.



December 12th, 2025

TO: Kenneth N. Barish, Chair, Academic Senate, UCR Division

FROM: Harry Tom, Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences

SUBJECT: [Systemwide Review] Proposal: Proposed Revisions to Presidential Policy on Education Loan Practices

Prof. Barish,

The CNAS Faculty Executive Committee has reviewed the proposed revisions to the presidential policy on education loan practices at their December 3rd meeting and has no objections to the proposed changes.

Sincerely,

A handwritten signature in black ink that reads "Harry W. Tom".

Harry Tom, Ph.D
Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences



Academic Senate

COMMITTEE ON UNDERGRADUATE ADMISSIONS

December 12, 2025

To: Kenneth Barish, Chair
Riverside Division

From: Manu Sridharan, Chair
Committee on Undergraduate Admissions

Re: **[Systemwide Review] (Proposal) Proposed Revisions to Presidential Policy on Education Loan Practices**

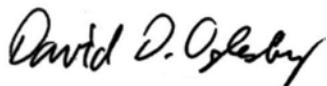
The Committee on Undergraduate Admissions reviewed the Proposed Revisions to Presidential Policy on Education Loan Practices at their meeting on December 12, 2025, and had no concerns from the admissions perspective.

PLANNING AND BUDGET

December 10, 2025

To: Kenneth Barish, Chair
Riverside Division

From: David Oglesby, Chair
Committee on Planning and Budget

A handwritten signature in black ink that reads "David D. Oglesby".

Re: [Systemwide Review] Proposal: *Proposed Revisions to Presidential Policy on Education Loan Practices*

The Committee on Planning and Budget (CPB) reviewed the *Proposed Revisions to Presidential Policy on Education Loan Practices*. CPB members generally agreed that the inclusion of the program in the loan policies is reasonable and expressed favor for any program that helps students with financial hardship. CPB did, however, have one question: how does the deferral interact with future student loan eligibility (especially given recent changes to the financial aid system, which are impacting medical students)?



OFFICE OF THE ACADEMIC SENATE

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LA JOLLA, CALIFORNIA 92093-0002
TELEPHONE: (858) 534-3640
FAX: (858) 534-4528

January 20, 2026

Professor Ahmet Palazoglu
Chair, Academic Senate
University of California
VIA EMAIL

Re: Divisional Review of Proposed Presidential Policy on Education Loan Practices

Dear Chair Palazoglu,

The proposed Presidential Policy on Education Loan Practices was distributed to San Diego Divisional Senate standing committees and discussed at the January 12, 2026 Divisional Senate Council meeting. Senate Council endorsed the proposal, noting that the revisions were required for regulatory compliance. Reviewers noted that extending the Deferred Tuition Plans to all UC campuses could raise additional budgetary issues that would need to be addressed at that time.

The Divisional Committee on Planning and Budget's response is attached.

Sincerely,

Rebecca Jo Plant
Chair
San Diego Divisional Academic Senate

Attachment

cc: Akos Rona-Tas, Vice Chair, San Diego Divisional Academic Senate
Lori Hullings, Executive Director, San Diego Divisional Academic Senate
Monica Lin, Executive Director, UC Systemwide Academic Senate

December 1, 2025

REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of Proposed Revisions to the Presidential Policy on Education Loan Practices

The Committee on Planning and Budget (CPB) discussed the Proposed Revisions to the Presidential Policy on Education Loan Practices at their November 18, 2025 meeting. It is the determination of the CPB that the inclusion in the Presidential Policy on Education Loan Practices of programs that provide extension of credit via deferred tuition plans does not, in itself, raise substantial budgetary concerns.

The Committee did consider the prospect that if these programs were extended to multiple UC campuses, it would at least be conceivable that there might be some significant resulting costs (e.g., through defaults, the possible loss-generating nature of tuition deferments themselves, losses arising from interest rate calculations and changes, delays in or lack of repayment because students fail to earn more than the specified amount per month, etc.). However, no evidence has been presented to the committee concerning any costs arising from the single existing pilot program at UC Davis.

Accordingly, the Committee supports the proposed changes to the Policy. Making all such programs subject to the Policy appears to be a measure necessary for regulatory compliance, and this is not a step that results in significant budget consequences for the University.

Sincerely yours,

Oliver Schmidt, Chair
Committee on Planning and Budget

cc: J. Coomer
S. Ben-Haim
L. Hullings
A. Rona-Tas



UC SANTA BARBARA

Academic Senate
Rita Raley, Chair
Shasta Delp, Executive Director

1233 Girvetz Hall
Santa Barbara, CA 93106-3050
<http://www.senate.ucsb.edu>

January 20, 2026

To: Ahmet Palazoglu, Chair
Academic Senate

From: Rita Raley, Divisional Chair
Academic Senate

A handwritten signature in black ink, appearing to read "Rita Raley".

Re: Proposed Presidential Policy on Education Loan Practices

The Santa Barbara Division distributed the Proposed Presidential Policy on Education Loan Practices to the Undergraduate Council (UgC), the Graduate Council (GC), the Council on Planning and Budget (CPB), and the Faculty Executive Committees (FECs) for the College of Letters and Science (L&S), the College of Engineering (COE), the College of Creative Studies (CCS), the Gevirtz Graduate School of Education (EDUC), and the Bren School of Environmental Science and Management (BREN). GC, CPB, and the L&S, CCS, EDUC, and BREN FECs elected not to opine.

Both UgC and the COE FEC endorse the proposed policy revisions. UgC offers additional comments, which are attached for consideration.

UC SANTA BARBARA
Academic Senate

DATE: December 17, 2025

TO: Rita Raley, Chair
Academic Senate

FROM: Giuliana Perrone, Chair
Undergraduate Council

gmore

RE: Proposed Revisions to the Presidential Policy on Education Loan Practices

The Undergraduate Council (UgC) has reviewed and considered the Proposed Revisions to the Presidential Policy on Education Loan Practices during their meeting of November 20th. UgC voted to endorse the proposal by a vote of 9 in favor, 0 against, and 1 abstention.

One of our members has particular expertise in the area under consideration and offered the following, which Council found especially relevant.

Rules and regulations of any deferred loan program should be examined for the potential to affect student choices in ways that could be considered undesirable. For example, imagine a student who has little information about how valuable enrolling in a program will be to them. If they believe that they will not have to pay back the loan associated with the program, they may choose to enroll in a program without obtaining additional information. If they know they will have to pay back the loan, they will obtain additional information and choose not to enroll. We do not want to create incentives for people to make decisions that are not in their best interest.

This is a "moral hazard" problem, where someone is protected from the consequences of their decisions, so they are more likely to take risks. Insurance is the most common example. If I decide to buy insurance on a rental car, I'm much less likely to worry about damaging the car and may drive less carefully as a result.

Strict income thresholds for repayment can also affect behavior. A student may be offered a job just above the threshold and choose to reject that job because it is associated with higher student loan payments. Graduated income thresholds help with this.

If these factors are considered, UgC would then encourage more divisions to look into this policy for accessibility options for other UC students. In that case, this should be highly promoted to the divisions and ensure that people know about this to make as many potential funding and loan options available to students. UgC does support making UCs more accessible and affordable for students.

CC: Shasta Delp, Executive Director, Academic Senate

SANTA BARBARA
Faculty Executive Committee
The Robert Mehrabian College of Engineering

January 14, 2026

TO: Rita Raley
Divisional Chair, Academic Senate

FROM: Dahlia Malkhi, Chair
College of Engineering, Faculty Executive Committee

RE: Proposed Revisions to the Presidential Policy on Education Loan Practices

The College of Engineering FEC met on January 13th and discussed the proposed revisions. The committee does not have any objections to the proposed revisions.

Signed by:

Dahlia Malkhi

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Office of the Academic Senate
SANTA CRUZ DIVISION
125 CLARK KERR HALL
(831) 459 - 2086

January 21, 2026

AHMET PALAZOGLU
Chair, Academic Council

RE: Systemwide Review of Proposed Presidential Policy on Education Loan Practices

Dear Ahmet,

The Santa Cruz Division has completed its review of the proposed Presidential Policy on Education Loan Practices with the Committees on Admissions and Financial Aid (CAFA) and Planning and Budget (CPB) responding and which are attached hereto.

CPB noted that the revisions were needed to bring UC into compliance with Federal law, and as such had no concerns or comment. CAFA raised two issues. The first was a request to clarify what is meant by a “retail installment” contract being offered by a university, and implicitly what implications of this framing might be, in law or existing policy. Second, while not new in the proposed new policy, they wished to surface and highlight questions about UC offering a “deferred” tuition program, in particular regarding issues of debt and debt collection. This is something that most faculty are likely not aware of and could merit an overview or discussion in Council if time permits.

On behalf of the Santa Cruz Division, I thank you for the opportunity to provide comment on this proposed policy.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Matthew D. McCarthy".

Matthew D. McCarthy, Chair
Academic Senate, Santa Cruz Division

Encl: Senate Committee Responses (Bundled)

cc: Luca de Alfaro, Chair, Committee on Admissions and Financial Aid

Tanner WouldGo, Chair, Committee on Educational Policy

Raphael Kudela, Chair, Committee on Planning and Budget

Megan Thomas, Chair, Committee on Teaching

Matthew Mednick, Executive Director, Academic Senate

January 16, 2026

MATTHEW McCARTHY, Chair
Academic Senate

Re: Systemwide Review of Proposed Presidential Policy on Education Loan Practices

Dear Matthew,

During its meeting of January 7, 2026, the Committee on Admissions and Financial Aid (CAFA) reviewed the proposed Presidential Policy on Education Loan Practices. CAFA notes that this policy is being proposed in response to guidance provided by Consumer Financial Protection Bureau (CFPB) regarding education loans as defined in section 140 of the Truth in Lending Act, 15 U.S.C. 1650. While we understand that this policy is being proposed to ensure that the UC system is compliant with federal guidance, members were left with some questions regarding its impact on the system.

The committee had two main comments.

The first definition in Section II starts, “Deferred Tuition Plan: A retail installment contract offered by the University”. What is the meaning of the term, retail, in this context? How does a university offer a retail financial product? And, how are the recipients selected?

The committee also expressed some surprise that UC is offering deferred tuition programs, and has several questions related to how they are administered. Among these:

- How is debt collection performed? Will it be performed by UC or one of its campuses or units, or will debt collection on deferred tuition programs be sold to third-party processors?
- If the latter, what are the legal implications for UC if the third-party processors violate regulations?
- If the former, does UC have the staffing and expertise to perform the task?
- Is it advisable that UC becomes a debt collector, with all the legal requirements, risks, and complexities it entails?

We recognize that feedback has been requested on the policy document, and not directly on the existence of deferred-tuition programs. Nevertheless, the committee is concerned about the implications of the existence of tuition-deferral programs, also beyond the need for updating the current Presidential Policy on Education Loan Practices.

Sincerely
/s/
Luca de Alfaro, Chair
Committee on Admissions and Financial Aid

cc: Tanner WouldGo, Chair, Committee on Educational Policy
Raphael Kudela, Chair, Committee on Planning and Budget
Megan Thomas, Chair, Committee on Teaching

November 21, 2025

MATTHEW McCARTHY
Chair, Academic Senate

Re: Systemwide Review of Proposed Revisions to Presidential Policy on Education Loan Practices

Dear Matt,

The Committee on Planning and Budget (CPB) has reviewed proposed revisions to the Presidential Policy on Education Loan Practices. We understand that deferred tuition programs fall under section 140 of the Truth in Lending Act, 15 U.S.C. 1650, and that the revisions bring UC into compliance. The proposed changes to the policy will ensure that students participating in the deferred loan program are protected, and we have no concerns or comments about the proposed changes to the policy.

Sincerely,



Raphael Kudela, Chair
Committee on Planning and Budget

cc: Luca de Alfaro, Chair, Committee on Admissions & Financial Aid
Megan Thomas, Chair, Committee on Teaching
Tanner WouldGo, Chair, Committee on Educational Policy
Matthew Mednick, Executive Director, Academic Senate



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UNIVERSITY COMMITTEE ON PLANNING AND BUDGET (UCPB)

Robert Brosnan
rjbrosnan@ucdavis.edu

December 4, 2025

Ahmet Palazoglu
Chair, Academic Council

RE: Systemwide Review of Proposed Presidential Policy on Education Loan Practices

Dear Ahmet,

UCPB reviewed the changes to the existing educational loan policy. The revisions bring Deferred Payment Plans (currently only at UC Davis), where students pay their tuition and fees monthly, smoothing what would be lump-sum payments out over the year with no interest charges, under the umbrella of the Educational Loan Practices policy.

Because payments are deferred, legally the program establishes an educational loan, and therefore is now included in the policy. Perhaps in anticipation of such programs being established on other campuses, the policy notes that any litigation, regulatory inquiries, or complaints need to be brought to the Office of the President rather than the originating campus.

UCPB is happy to endorse the policy changes.

Sincerely,

Robert Brosnan
Chair

cc: UCPB