

May 5, 2025

James P. Bergeron
Acting Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC, 20202

RE: Docket ID ED-2025-OPE-0016

We, the undersigned 186 organizations representing millions of students, borrowers, workers, people of color, veterans, women, people with disabilities, and consumers crushed under the weight of student loan debt, write in response to the Trump Administration's announcement of intent to [establish a negotiated rulemaking process](#) to make changes to the Pay As You Earn (PAYE) and Income-Contingent Repayment (ICR) repayment plans, Public Service Loan Forgiveness (PSLF) and other topics that would streamline current federal financial assistance programs.

Today, more than 40 million Americans owe more than \$1.6 trillion in student loan debt and millions are struggling to stay on track with their student loans while also keeping up with the rising costs of everyday goods like food, rent, childcare, and medication. Making matters even worse, over the last several months, instead of working to bring down costs and make college more affordable for working families, across the federal government entire agencies have been dismantled and more than [24,000 workers have been](#) purged from their public service jobs—threatening the economic security of thousands of Americans directly affected, as well as the millions more across the nation that rely on the swift administration of critical government benefits and services.

We write in strong opposition to the Trump Administration's attempts to implement Project 2025, which calls for [gutting Income-Driven Repayment](#) (IDR) options and ultimately [eliminating PSLF](#), which will only push borrowers further into debt and relief further out of reach. We voice this opposition alongside our ongoing opposition to any efforts, including through the regulatory process, to weaken protections for students against high-cost, low-quality programs that engage in waste, fraud, and abuse of the financial aid programs upon which millions of students rely; defrauded borrowers; and students whose institutions close. The Administration should move to enact policies that better protect student borrowers, rather than pursue misguided policies that will drive up costs and weaken protections.

As millions of American families are forced to navigate today's unpredictable economic climate, a strong student loan safety net has never been more critical.

Over the last three decades, policymakers have created several IDR plans in recognition of the need for more affordable repayment options that allow borrowers to tie their monthly bills to their income, reduce the likelihood of delinquency and default and protect borrowers from a lifetime of debt. However, for too long, existing IDR options served as a debt trap—allowing balances to balloon and failing to provide the true financial relief distressed borrowers needed. Many of these historic failures ultimately led to the Biden Administration creating the Saving on a Valuable Education (SAVE) plan, which would have cut monthly payments in half for certain borrowers, protected borrowers from runaway balances, and expedited debt relief. Over 8 million borrowers jumped at the chance to enroll in SAVE before it was blocked by [partisan lawsuits](#). Recent data show that student loan delinquencies have now skyrocketed with roughly [four million Americans behind on their student loan payments](#). Instead of the Trump Administration working to defend this program in the courts and ensuring that borrowers are able to access the most affordable repayment options, this Administration has forced millions to remain in economic limbo and [pushed IDR options out of reach for millions](#). Millions of borrowers are desperately trying to repay their student loan debt, however government mismanagement and student loan industry abuses have made it nearly impossible.

As millions of borrowers now face a [looming default cliff](#), this Administration's announced plans to make further changes to the IDR system will have massive economic ramifications. Therefore, we strongly oppose any efforts that would force working families to have to pay even more on their monthly student loan bills, remove critical protections from runaway balances driven by interest, and deprive borrowers of critical time-based cancellation.

Efforts to limit access to or weaponize PSLF will threaten critical public service fields and harm our most vulnerable communities.

Congress created PSLF in 2007 to provide public service workers with student loan debt relief in exchange for a decade of service to their communities. Since its creation, the program has enjoyed strong bipartisan support, strengthened rural, suburban, and urban communities alike, helped fill critical workforce shortages in education, healthcare, public safety, and national security, and delivered relief to more than 1 million public service workers. The PSLF program has provided a critical incentive for Americans interested in serving our country and local communities regardless of their political affiliation.

We were incredibly troubled to see President Trump's [executive order](#) aimed at limiting access to PSLF for public service workers employed at organizations engaging in work that is not in line with President Trump's agenda. The Department's efforts to engage in rulemaking to make

unlawful changes to PSLF eligibility are directly related to the goals of this executive order, exceed the Administration’s authority outright, and have already had a chilling effect on public service organizations doing necessary work on behalf of our most vulnerable communities. The Higher Education Act is crystal clear that a “public service job” includes any employment in government or at a 501(c)(3). We strongly oppose any effort by the Trump Administration to limit PSLF eligibility to cherry pick organizations that they may not agree with.

Sincerely,

Student Borrower Protection Center
Democracy Forward

National Organizations

20/20 Vision

Adasina Social Capital

Affordable Homeownership Foundation Inc

AFL-CIO

AFT, AFL-CIO

American Association of University Professors

American Association of University Women (AAUW)

American Federation of State, County & Municipal Employees

Americans for Financial Reform Education Fund (AFREF)

Asian Americans Advancing Justice | AAJC

Autistic Women & Nonbinary Network

Center for Law and Social Policy (CLASP)

Center for Responsible Lending

CenterLink: The Community of LGBTQ Centers

Clearinghouse on Women's Issues

Communications Workers of America (CWA)

Consumer Action

Council on Social Work Education

Debt Collective

EdTrust

Equal Rights Advocates

Faith in Action Network

Feminist Majority Foundation

Fosterus

HBCU Collective

HEAL (Health, Environment, Agriculture, Labor) Food Alliance

Hispanic Federation
Immigration Equality
Independent Staff Union (of NTEU employees)
International Federation of Professional and Technical Engineers (IFPTE)
International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW)
MDC
Minority Veterans of America
Movement Advancement Project
NAACP
National Association for College Admission Counseling
National Association of Social Workers
National Association of Student Loan Lawyers
National Council of Asian Pacific Americans (NCAPA)
National Education Association
National Employment Law Project
National Nurses United
National Women's Law Center
Project on Predatory Student Lending
Public Counsel
Public Good Law Center
Quiet Creek Herb Farm & School of Country Living
RootsAction
Secular Student Alliance
Service Employees International Union (SEIU)
Southeast Asia Resource Action Center (SEARAC)
Student Debt Crisis Center
Sugar Law Center for Economic & Social Justice
Swipe Out Hunger
The Century Foundation Higher Education Team
The Institute for College Access and Success
The Shalom Center
UnidosUS
United States Student Association
We the 45 Million
Young Invincibles

State & Local Organizations

AFT New Mexico

AFT-Oklahoma
Albuquerque Teachers Federation
Alliance for a Better Community
Alliance of Rhode Island Southeast Asians for Education (ARISE)
Arizona Students' Association
Associated Students of Portland Community College
Cal State Student Association
CASH Campaign of Maryland
CFPB Union NTEU 335
Church Women United in New York State
Citizen Action of Wisconsin
Civil Service Bar Association
Community Legal Aid Society Inc. (Delaware)
Community Service Society of New York
Consumer Federation of California
Convencion Bautista Hispana de Texas
Directly Impacted Educational Consulting
Economic Action Maryland Fund
Education Minnesota
Equality North Carolina
Faith Action For All
Fayetteville Police Accountability Community Taskforce
Freedom BLOC
GenerationUp
Georgia Budget & Policy Institute
Hawai'i State Teachers Association
HIAS Pennsylvania
Hildreth Institute
Housing and Economic Rights Advocates
La Raza Centro Legal, SF
Long Beach Alliance for Clean Energy
Miami Valley Fair Housing Center, Inc.
Missouri Faith Voices
Mountain State Justice, Inc.
National Association of Social Workers DC Metro Chapter
National Association of Social Workers, Alabama Chapter
National Association of Social Workers, Alaska Chapter
National Association of Social Workers, Arizona Chapter
National Association of Social Workers, Arkansas Chapter
National Association of Social Workers, California Chapter

National Association of Social Workers, Colorado Chapter
National Association of Social Workers, Connecticut Chapter
National Association of Social Workers, Delaware Chapter
National Association of Social Workers, Florida Chapter
National Association of Social Workers, Georgia Chapter
National Association of Social Workers, Guam Chapter
National Association of Social Workers, Hawaii Chapter
National Association of Social Workers, Idaho Chapter
National Association of Social Workers, Illinois Chapter
National Association of Social Workers, Indiana Chapter
National Association of Social Workers, Iowa Chapter
National Association of Social Workers, Kansas Chapter
National Association of Social Workers, Kentucky Chapter
National Association of Social Workers, Louisiana Chapter
National Association of Social Workers, Maine Chapter
National Association of Social Workers, Maryland Chapter
National Association of Social Workers, Massachusetts Chapter
National Association of Social Workers, Michigan Chapter
National Association of Social Workers, Minnesota Chapter
National Association of Social Workers, Mississippi Chapter
National Association of Social Workers, Missouri Chapter
National Association of Social Workers, Montana Chapter
National Association of Social Workers, Nebraska Chapter
National Association of Social Workers, Nevada Chapter
National Association of Social Workers, New Hampshire Chapter
National Association of Social Workers, New Jersey Chapter
National Association of Social Workers, New Mexico Chapter
National Association of Social Workers, New York City Chapter
National Association of Social Workers, New York State Chapter
National Association of Social Workers, North Carolina Chapter
National Association of Social Workers, North Dakota Chapter
National Association of Social Workers, Ohio Chapter
National Association of Social Workers, Oklahoma Chapter
National Association of Social Workers, Oregon Chapter
National Association of Social Workers, Pennsylvania Chapter
National Association of Social Workers, Puerto Rico Chapter
National Association of Social Workers, Rhode Island Chapter
National Association of Social Workers, South Carolina Chapter
National Association of Social Workers, South Dakota Chapter
National Association of Social Workers, Tennessee Chapter

National Association of Social Workers, Texas Chapter
National Association of Social Workers, Utah Chapter
National Association of Social Workers, Vermont Chapter
National Association of Social Workers, Virgin Islands Chapter
National Association of Social Workers, Virginia Chapter
National Association of Social Workers, Washington Chapter
National Association of Social Workers, West Virginia Chapter
National Association of Social Workers, Wisconsin Chapter
National Association of Social Workers, Wyoming Chapter
New Jersey Citizen Action
New Jersey Institute for Social Justice
New York Legal Assistance Group (NYLAG)
NextGen California
NJ Communities United
Northeast Organic Farming Association of New Hampshire (NOFA-NH)
OCA Greater Chicago
Ohio Student Association
Olive Hill Community Economic Development Corporation, Inc
OneJustice
Partners Against eXploitation
San Francisco Rising
SEIU Local 500
Southern California College Attainment Network
Student Loan Fund (SLF)
Students Engaged in Advancing Texas
Students United
Texas State Teachers Association
The Academy of Financial Education
The Counseling Lounge
Tzedek DC
UAW Local 2325/Association of Legal Advocates and Attorneys
UC-AFT Local 1474
UIC United Faculty, AFT-AAUP Local 6456
United University Professions/AFT 2190
University of California Student Association (UCSA)
University of Washington Graduate and Professional Student Senate
Vermont-NEA
Virginia Poverty Law Center
Washington Office of the Student Loan Advocate
Washington Student Association

Wisconsin Education Association Council
Women Employed