

June 2, 2025

James P. Bergeron
Acting Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20024

Dear Acting Under Secretary Bergeron,

We write as advocates for students, student loan borrowers, consumer protection, civil rights, union members, veterans, and other stakeholders in higher education to respond to the Education Department's (ED) May 12, 2025, Federal Register (Docket ID ED–2025–OPE–0016) notice inviting nominees for the upcoming negotiated rulemaking committee. A diverse set of negotiators representing the broad set of stakeholders—within a manageable number—is critically important when crafting regulations that affect millions of students and borrowers nationwide. The Department's currently planned combination of stakeholder seats for this table fails to elevate key views and does a disservice to the rulemaking process. We urge ED to provide distinct seats that enable a fuller set of needed perspectives at the negotiating table.

We are concerned that the Trump Administration is using this negotiated rulemaking session to make harmful changes to Income-Driven Repayment plans and the Public Service Loan Forgiveness Program—both of which act as critical components of the student loan safety net and provide critical debt relief to workers in public sector jobs. Specifically related to the topics of this upcoming rulemaking, 12.3 million borrowers are now enrolled in an Income-Driven Repayment plan, representing borrowers living in every state of all ages, degree attainment levels, and loan amounts. As of December 2024, nearly 2.5 million borrowers were in the pipeline for Public Service Loan Forgiveness.

Given the breadth of experiences that will be affected as a result of this rulemaking, borrower voices, whether directly or through advocacy organizations, must be prioritized. In particular, entities that represent legal aid organizations, consumer advocacy organizations, and civil rights organizations should be separate and distinct categories to ensure proper representation for each of these essential stakeholder groups. Individuals with disabilities or groups representing them should also be included. These groups represent distinct interests and areas of expertise that are critical for understanding the macro issues that impact borrowers writ large.

Accordingly, we urge you to provide separate the seats for those constituencies, and present you with a set of highly qualified experts nominated by the following constituencies for your consideration as negotiators:

- Civil rights organizations.
- Consumer advocates.

- Legal assistance organizations that represent students and/or borrowers.
- State officials, including state higher education executive officers, state authorizing agencies and state attorneys general.
- Student loan borrowers in repayment.
- Individuals with disabilities or groups representing them.
- Financial aid administrators at postsecondary institutions.
- Organizations representing taxpayers and the public interest.

Thank you for your consideration of these prospective negotiators, as well as of the needed reformatting of seats at the negotiating table. Please contact any group listed below with any questions or further ways we can support a better informed, more inclusive process.

Sincerely,

AACTE: American Association of Colleges for Teacher Education
 Affordable Homeownership Foundation Inc
 AFT-Oklahoma
 AFT, AFL-CIO
 American Association of University Professors (AAUP)
 American Association of University Women (AAUW)
 Center for Responsible Lending
 Church Women United in New York State
 Clearinghouse on Women's Issues
 Community Legal Aid Society, Inc. (Delaware)
 Community Service Society of New York
 Consumer Action
 EdTrust
 Equal Rights Advocates
 Faith Voices of Southwest Missouri
 Feminist Majority Foundation
 Formerly Incarcerated College Graduates Network
 Fosterus
 Georgia Budget & Policy Institute
 GLBTQ Legal Advocates & Defenders (GLAD Law)
 HEAL (Health, Environment, Agriculture, Labor) Food Alliance
 International Federation of Professional and Technical Engineers (IFPTE)
 La Raza Centro Legal
 MDC
 Minority Veterans of America
 Missouri Faith Voices
 NAACP
 NASLL [National Association of Student Loan Lawyers]

National Association for College Admission Counseling
National Association of Social Workers
National Education Association
National Women's Law Center
New America Higher Education Program
Ohio Student Association
Olive Hill Community Economic Development Corporation, Inc
Project on Predatory Student Lending
Protect Borrowers Action
Public Justice Center
RootsAction
Secular Student Alliance
SEIU Local 500
Student Borrower Protection Center
Student Debt Crisis Center
Student Loan Fund (SLF)
Students Engaged in Advancing Texas
Texas State Teachers Association
The Academy of Financial Education
The Freedom BLOC
The Institute for College Access and Success
Tzedek DC
UnidosUS
United University Professions/AFT Local 2190
University of California Student Association (UCSA)
Vermont-NEA
Washington Office of the Student Loan Advocate
Washington Student Association
Wisconsin Education Association Council
Women Employed
Young Invincibles

Civil rights organizations		
Name	Organization	Email
Jaylon Herbin	Center for Responsible Lending	jaylon.herbin@responsiblelending.org
Chavis Jones	Lawyers' Committee for Civil Rights Under Law	cjones@lawyerscommittee.org
Consumer advocates		
Name	Organization	Email
Winston Berkman-Breen	Student Borrower Protection Center	winston@protectborrowers.org
Terrell Blount	Formerly Incarcerated Graduates Network	tblount@ficgn.org
Legal assistance organizations that represent students and/or borrowers		
Name	Organization	Email
Abby Shafroth	National Consumer Law Center	ashafroth@nclc.org
Alexandria Farrell	Bay Area Legal Aid	afarrell@baylegal.org
Individuals with disabilities or groups representing them		
Name	Organization	Email
John Whitelaw	Community Legal Aid Society, Inc.,	jwhitelaw@declasi.org
State officials, including state higher education executive officers, state authorizing agencies and state attorneys general		
Name	Organization	Email
Martha Fulford	Colorado AG	martha.fulford@coag.gov
Amber Hay	WA Office of the Student Loan Advocate	amberh@wsac.wa.gov
Student loan borrowers in repayment		
Name	Organization	Email
Satra D. Taylor	University of Maryland, College Park	satraty@gmail.com
Greyson Cox	University of Maryland Francis King Carey School of Law	gcox1@umaryland.edu
Financial aid administrators at postsecondary institutions		
Name	Organization	Email
Katherine Presutti	University of Hartford / Executive Director of Financial Aid	kpresutti@hartford.edu
Organizations representing taxpayers and the public interest		
Name	Organization	Email
David Hawkins	National Association for College Admission Counseling (NACAC)	dhawkins@nacacnet.org