

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