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P R O C E E D I N G S

MS. ABERNATHY: Welcome back from lunch. We'll get right started with our next comment. As a reminder, please come up to the podium, give your name, your affiliation, and then I'll let you know you have three minutes. Persis. Persis Yu. is it on?

MS. YU: There we go.

MS. ABERNATHY: Okay. You have three minutes.

MS. YU: Thank you. Good afternoon. My name is Persis Yu, and I'm the deputy executive director and managing counsel of the Student Borrower Protection Center. We stand in strong opposition to the Trump Administration's attempt to implement Project 2025, which calls for gutting Income Driven Repayment options and eliminating Public Service Loan Forgiveness. Let's be clear. The Trump Administration's assault on IDR and PSLF isn't reform, it's retaliation. These actions would force nurses, teachers, veterans, and others who have dedicated their careers to serve our communities, to choose between paying their monthly student loan bills and putting food on their table. Borrowers everywhere would be taken further into debt while relief is pushed further out of reach. Congress passed the Income Contingent Repayment statute with a clear goal to prevent student debt from

becoming a life sentence. Despite attempts by right wing groups to rewrite history, it is clear that Congress intended ICR to include cancellation after no more than 25 years. For 30 years, administrations of both parties have refined protections to keep borrowers out of delinquency, default, and a lifetime of debt. But for too long, government mismanagement and student loan industry abuses made existing IDR options more of a debt trap, allowing balances to balloon and failing to provide the financial relief borrowers need. These historic failures led the Biden Administration to create the saving on a valuable education plan. I proudly served as a primary legal aid negotiator on the rulemaking committee, which created the SAVE Plan. During these negotiations, borrowers provided heartbreaking testimony about the inability to afford their rent, pay for critical medical care, and cover other basic necessities. The resulting SAVE Plan, which proponents of Project 2025 claim is too generous, was pegged to the amount that would reduce food insecurity. It would have cut monthly payments in half for many borrowers, protecting borrowers from runaway balances and expedited debt relief for borrowers with low balances. Student loan delinquencies are now skyrocketing, with nearly four million borrowers behind on their student loan payments. But instead of defending

affordable repayment options, this Administration has forced millions to remain in economic limbo. As borrowers face a looming default cliff, this administration plans to start ripping vital Social Security benefits from millions of seniors and borrowers with disabilities. Instead of helping millions of borrowers who have been failed by this broken student loan system, it's eliminating what few safeguards exist to help them. Instead of strengthening Public Service Loan Forgiveness and ensuring public service workers get the relief they are entitled to, this Administration plans to illegally weaponize PSLF in order to punish public service workers employed at organizations engaged in work that is not in line with President Trump's agenda. These efforts will ultimately threaten critical public service fields and harm our most vulnerable communities.

MS. ABERNATHY: 20 seconds.

MS. YU: For these reasons, we strongly oppose any efforts that would force working families to pay even more on their monthly student loan bills and deprive borrowers of critical cancellation. Thank you.

MS. ABERNATHY: Thank you for your comment. Daniel Carter?

MR. CARTER: Good afternoon.

MS. ABERNATHY: You have three minutes.

MR. CARTER: Good afternoon. My name is S. Daniel Carter, President of Safe Campuses LLC, a campus safety consultant from Georgia. With three decades of experience in campus safety and security, I am grateful for the opportunity to speak today about the Clery Act regulations and their vital role in protecting students and ensuring institutional accountability. For context, the Clery Act is a Federal Law under Title IV of the Higher Education Act that requires colleges and universities to report campus crime data, maintain security policies, and alert the campus community about ongoing threats. This includes issuing annual security reports, keeping a daily crime log, and providing timely warnings, measures that promote transparency and safety on campuses nationwide, and protect taxpayer investment. The Clery Act regulations provide critical clarity that enable institutions to meet their statutory obligations effectively. For instance, they define key terms like campus security authority, interpretations that are not arbitrary but necessary to implement the statute's broad mandates. They also detail how to compile crime statistics and maintain logs, ensuring consistent,

accurate reporting across institutions. If the Department is considering evaluating these regulations, I urge caution. The regulations are essential tools for compliance carefully aligned with the statute's purpose. It would be prudent to defer any evaluation until it can receive the thorough, thoughtful attention it deserves. Campus safety is a nuanced and dynamic issue and rushed changes could create confusion. Finally, if the Department opts for Negotiated Rulemaking on Clery Act issues, I strongly recommend including relevant practitioners and experts as nonfederal negotiators. Campus safety professionals, compliance officers, and victim advocates bring invaluable real-world insights. Having served as a non-federal negotiator three times, 1999, 2009, 2014, I can attest that this collaborative process, mandated by the Higher Education Act, encourages, ensures regulations are practical, effective, and responsive to institutional challenges. In closing, the Clery Act regulations are indispensable tools for compliance and safety. They are not mere additions, but necessary implementations of the statute's framework developed through a collaborative, expert-informed process. Any review should be measured, prioritizing clarity, caution, and collaboration to preserve their effectiveness. I encourage the Department to uphold these

principles in addressing these critical issues. Thank you for your time. And one last note I would second the request of the gentleman earlier outside the Negotiated Rulemaking process for some clarity on the timelines for the Stop Campus Hazing Act. Thank you.

MS. ABERNATHY: Thank you for your comment. Elizabeth Tang. You have three minutes.

MS. TANG: Hi, my name is Elizabeth Tang and I'm here to ask you not to make any changes that undermine or cancel critical programs like Public Service Loan Forgiveness and Income Driven Repayment, including Pay as You Earn. I'm a child of immigrants. I was lucky enough to receive both merit and need-based scholarships to attend college. After college, I spent two years working at a nonprofit advocating against gender-based violence in India, earning a salary of \$15,000 in total over those two years. When I returned to the US and started a dual degree program, including a law degree, I had to take out more than \$300,000 in federal loans to pay for it. Since graduating, I've been practicing as a civil rights attorney at a nonprofit organization advocating on behalf of survivors of gender-based violence. My work has included educating students and workers about their rights, advocating for stronger laws and regulations against gender-based violence, including

here at the Department and litigating against schools and government bodies that violate those rights. I could not have done any of this work without IDR and the promise of PSLF. When I started my career, my salary was \$50,000 a year despite having three degrees, including two advanced degrees. IDR was what allowed me to afford to live in DC at all. Today, I've made nearly 90 payments toward the 120 payments required for loan cancellation under PSLF, yet my total balance remains over \$300,000 and in fact has only increased. There is simply no way I could ever pay this off without IDR. My economic security and that of my future child, who is due in July, depends critically on the continued existence of IDR and PSLF. Now it is true I could switch to a corporate law job with an astronomically higher salary, helping a corporation accumulate more profit, but I have no desire to do so. I know that my lifelong passion is fighting systemic injustice for people who live at the margins of society. At the same time, I know the stark reality is that if the Department or Congress chooses to gut IDR, I will not be able to afford to pay 50% or 70%-75% of my take-home pay toward my student loans. And if you or Congress decides to gut PSLF, I will be locked in a catastrophic lifetime cycle of debt that will drastically limit and foreclose choices and possibilities not only for me, but also for

my future child. And this is the case for millions of students across the country. I remember in college how billion-dollar corporations avidly recruited on campus. I, too, explored but ultimately rejected one of these high-paying jobs. But today, a full 50% of my college's graduating class will take lucrative careers in finance, consulting, and technology. And 74% of my law school will take a lucrative career at a corporate law firm. Less than 11% of my law school will choose public interest. That number will only plummet further if you take away IDR and PSLF. IDR and PSLF are not just programs that support the livelihood of public interest workers like myself. They are also investments in our nation's public interest programs, public education, life-saving healthcare, pro-bono legal services, and other vital programs that serve millions of people across (30 seconds). Preserving IDR and PSLF is far bigger than the people testifying in this room today. It is about investing in the future sustainability and vitality of this country. It is undeniably a moral decision, and I hope you make the right one. Thank you.

MS. ABERNATHY: Thank you for your comments. Clinton Walls?

DR. WALLS: Hi, my name is Clinton Walls.

MS. ABERNATHY: You have three minutes.

DR. WALLS: Thanks. I'm Dr. Clinton Walls. I have no fancy affiliation aside from just being a student loan borrower who has over half-a-million dollars in student loan debt and nine years and eight months into the PSLF program. So, if we look back at this in 1965, the original AGA passed and out of that, we got GBL, which in the 90s evolved into FFEL, which was then scrapped for the FDLP. And under all these repayment programs, we got IBR and then we got the broader-based IDR, which had PAYE and then had REPAYE and has ICR and then SAVE REPAYE turned into SAVE and now SAVE doesn't exist basically. And anyway, we got this alphabet soup and my idea or my opinion on all of this is that the student loan system has become very fragmented. And I can, as a physician who works in hospitals and I'm used to age caps and HIPAA and EMTALA and all of the alphabet soup of that world, I appreciate the effort to try to reform this and streamline things. I kind of feel like if we look at this whole situation here, after six decades of this process, we've come to a pretty good program in the 2010s. PAYE was working well the powers that be that could have challenged the repayment terms under PAYE did not choose to do so. And actually, that's now passed the

statute of limitations. REPAYE was created just to backfill in an arbitrary cutoff date that was created under PAYE and essentially had very similar terms; 90% of the terms were similar. And that was kind of trucking along fine until prior administration decided to rock the boat. And I'm not here to talk about the prior administration rocking the boat, but I feel like moving forward, you're looking for solutions. I feel like if we look at what was previously created, there's an opportunity here to create a unified repayment plan that would apply to everyone that takes the best of the terms of PAYE and REPAYE that were not challenged a 10% cap on discretionary income for the payment amount. You could look at what Congress passed with IDR that said that a 25-year repayment term would be the max, combine those things, make it apply to all borrowers, and you'd have a very simple, straightforward, every borrower knows what they're getting themselves into, every borrower is eligible for the same kind of program, which hopefully is what you're looking to do. The only other thing I would say is Public Service Loan Forgiveness, if I'm being honest, I think it should be outside the scope of what's being considered right now, because it was created by an act of Congress and by being created by an act of Congress, executive action, and the action of the

Department should not be able to modify that. And a lot of people have been relying on that for a decade of their lives, like myself. Thank you for your time.

MS. ABERNATHY: Thank you for your comments. Latianna Nichols-Badu? Mary Lyn Hammer? You have three minutes.

MS. HAMMER: Thank you. My name is Mary Lyn Hammer, and I'm the president and CEO of Champion College Solutions, Champion Empowerment Institute, and Champion for Success. And my passion for this industry comes from growing up in an abusive home in Montana where it was pretty rough, and I figured out early on that education was my ticket to freedom. And so, I enrolled in advanced classes early on. And I graduated from college when I was 19 years old. And that allowed me to break away from the generations of abuse that had gone on in my family. And in 1988, January, I was hired as the first full-time default manager in the history of the country. The first language about default management was Appendix D, and that was written by me with some of the Department officials. And that was mandatory language from 1989 to 1996. When it was rewritten into subpart M and subpart N, I was one of the negotiators. I've negotiated many times, and I've helped to contribute to every higher education law since 1988, so I have

extensive knowledge of the business. My oldest company is 35 years old, and we've been doing default management for 35 years. So, during that time, what I have discovered is that there's basically three categories of people who either pay or default. There's a percentage that will always pay. There's a percentage that will never pay. And then there's a big bucket in between. And those are the people where we can make a difference. Those are the people that just need some extra handholding. And based on the criteria for qualifying for these loans, the more you qualify, the lower the income. And they often come from welfare recipient backgrounds where nobody's ever had a checking account. And so, what's happened over the years is complexity is the enemy of execution. And it's become way too complex for most of the people who qualify for the biggest amounts of loans. So that's something that I feel that we can address. The solutions and repayment should reduce the debt, which has been a huge problem. It should support higher education, and it should empower people who otherwise would never have a chance to build a credit portfolio. So, it can truly change somebody's life, not just in student loans, but in what it can do for them down the road when they have a credit file. So, the components of it that are important are that it must be affordable. And that's the most

complex part of this is, what is affordable? So, you have to take into consideration-

MS. ABERNATHY: 20 seconds.

MS. HAMMER: -if the payments are affordable, if it pays down the principle, and if the loan forgiveness is affordable. And so, I think through a combination of changing what we have, incorporating more of the standard repayment program where it's predictable, we can get there.

MS. ABERNATHY: Time.

MS. HAMMER: Thank you.

MS. ABERNATHY: Thank you for your comments. Melissa Byrne?

MS. BYRNE: Hi. My name is Melissa-Byrne with We the 45 Million. I am a borrower and I'm here today because there's a bunch of billionaires in America, including Linda, who is at this agency who lied to everybody about a golden age in America, but really, they just want to bring back a gilded age in America. We're not here today because you guys actually want to help borrowers. You're here because people like James care more about the loan companies and the people that are profiting off us. You don't care about the fact that they've been defunding higher education for the last 40, 50 years so that way we have a loan-based system as

opposed to a free higher education system that's public. So, we're here because you guys want to hurt borrowers. You want to hurt future students. And I think that's despicable. There's nothing American about coming here and saying, we're going to hurt you and we're going to harm you. The best you guys could do for student loan borrowers for the next three and a half years is nothing. If you just kept things as status quo, we can hopefully in four years be able to clean up the mess that you and your DOGE Bros are doing to people. And it's disgusting and it's horrible. Right now, you fired the people that could actually help student loan borrowers. And for some reason, you've kept around other people who don't want to actually help borrowers. And people like James and on the outside who are on the outside the last four years, you brought it all the way to the Supreme Court over the contract for MOHELA to harm borrowers, and all of a sudden now you just slashed contracts every single day as if there's nothing to do with contracts. So, let's be clear. What you guys' care about today is hurting borrowers. It's burning down the American Dream because you would rather kids who are born poor and middle class wipe the shoes of people that are born affluent, wipe the rings of Linda McMahon. It is time for these billionaires just to go float on their yachts in the Mediterranean and

leave the workings of America to people who actually care about each other. And it is shameful. And anybody here who works to hurt student loan borrowers, shame on you. Shame on everybody who wants to hurt borrowers, hurt students, hurt families. And I hope every single day of your lives you feel guilt and shame for hurting everybody. And you have a chance today to leave here after listening to borrowers and say, you know what? The DOGE Bros, Elon, Trump, they're all full of (inaudible) and I'm going to turn my life around and I'm going to help borrowers. I'm going to help students. Or you can choose to say (inaudible) Americans, we're just going to help the few become super wealthier than they already are. Maybe you all can just get on a rocket ship with Elon and go to Mars. (30 seconds) And so in closing, literally just do nothing for the next three and a half years. That's the best you can do for borrowers. Otherwise, just know (inaudible)

MS. ABERNATHY: Thank you for your comments. Amelia Mercado? Three minutes.

MS. MERCADO: My name is Amelia Mercado. I am a third-year medical student at Baylor College of Medicine in Houston, currently interning with the American College of Physicians in DC. Thank you for this opportunity to speak about PSLF today. Like many

students, I researched financial aid options before curriculum or faculty-to-student ratios when applying to medical school, and this approach helped me secure a full tuition scholarship at Baylor to also graduate with debt from living expenses. I am incredibly lucky, though. Many of my classmates from undergrad had to accept their only admission offer from medical schools charging over \$70,000 annually, accumulating over \$280,000 in tuition debt alone. And these costs are unfortunately changing medicine. A 2023 survey found that 1 in 4 medical students consider quitting, and 61% plan to pursue careers that do not involve patient care. For those that remain, many choose lucrative specialties or wealthy areas just to manage debt, avoiding public institutions entirely. Rural families, working-class communities, and veterans suffer as a result. But PSLF provides that critical bridge, allowing physicians to serve vulnerable populations while maintaining financial stability. During my clinical rotations, I've witnessed firsthand that public service hospitals are where we help America's most vulnerable. I've seen the best and worst of humanity in Houston's beloved Ben Taub, our community safety net hospital where no one is turned away. I will never forget caring for an incarcerated woman giving birth completely alone. With no family or support allowed, I held her hand

throughout her delivery and when the nurse asked for the baby's name, my patient turned to me, looked at my badge, and quietly read my first name, Amelia. And this wasn't gratitude. It simply revealed how little kindness she had experienced in her life and the simple act of holding her hand, the most basic form of human compassion, prompted her to name her baby after me. And it shows how really she had been treated with basic dignity. This moment shows what public service medicine offers the opportunity to be present for society's most marginalized, treating them with the humanity everyone deserves. Student debt should not force physicians away from these essential settings towards higher-paying private facilities, serving only those who can afford care. PSLF provides a clear, compact, committed decade to serving your community and receive student debt relief. It upholds service and responsibility, which are values that transcend political divides and unite us as Americans. I urge you to strengthen and protect this vital program that represents the best of who we are as a nation. Thank you.

MS. ABERNATHY: Thank you for your comments. Kathryn Gimborys. I apologize if I've massacred that name. You have three minutes.

MS. GIMBORYS: Good afternoon. My name

is Kathryn Gimborys, and I'm the government relations manager at the American Association of Community Colleges. AACC will submit detailed comments on the rulemaking process next week. But today, we would like to highlight four key areas that we urge the Department to look at as you put together your rulemaking agenda.

First, we share the Department's goal of streamlining and improving existing Title IV processes to promote innovation in student success. To that end, we encourage the Department to revisit the regulations around return of Title IV funds. While the rules were improved during the last round of Negotiated Rulemaking, they remained needlessly complicated, burdensome, and time-consuming. We believe that they can be further simplified. Second, our member colleges continue to tell us that approval of program participation agreements, recertification, and program review procedures are extremely burdensome and time intensive. Collectively, they stifle the ability of community colleges to be nimble and to adapt to changing workforce and student needs. We urge the Department, rather, to systematically review the regulatory framework in these areas to decrease institutional burden, in part by reducing overlap. Next, we ask the Department's help in combating fraudulent students who used stolen identities to access and steal financial aid refunds.

This is an issue that greatly impacts community colleges because of our low tuitions. Our colleges continue to devote significant resources to identifying fraudulent students, often partnering with expensive vendors, and to date, they have received very little material or technical support from the Department. They are then left on the hook for any stolen funds as part of R2T4. We urge you to consider this problem during Negotiated Rulemaking. Excuse me. Finally, as the Department weighs changes to existing Income Driven Repayment plans, we urge you to craft policies that consider the experiences of low balance community college borrowers by only 12% of our students borrow, and they borrow significantly lower amounts than other types of students. They are more likely to be low-income and face greater obstacles to repayment. To that end, we ask the Department to consider a shorter timeline to forgiveness under IDR for small balance borrowers. Thank you for the opportunity to share these topics, and we look forward to working with you on these and other issues throughout the rulemaking process.

MS. ABERNATHY: Thank you for your comments. Did Latianna Nichols-Badu show up? No? At this time, are there any of you in the audience who have not already spoken that would like to come up and make a public comment? Going once, going twice. Once again, I'd

like to acknowledge and thank the wonderful team members we have who have worked tirelessly behind the scenes to make this hearing happen. Conference team, event planners, technical assistance, logistics, our staff in the Office of Postsecondary Education. There were a number of logistic and technical, issues that needed attention and monitoring. Thank you to all who coordinated and organized, tested, confirmed, and assisted in every way with the many details needed to host this event. Without your efforts, this would not be possible. On behalf of Deputy Undersecretary and Assistant Secretary James Bergeron, we thank you, team, for your hard work and dedication to make this event successful. And from the bottom of my heart and our hearts, we appreciate you. And to you, and our virtual public, on behalf of the entire Department of Education team, we thank you for your comments and joining us today. Thank you for your feedback.

