

DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION
NEGOTIATED RULEMAKING PUBLIC HEARING
SESSION 1, DAY 2, MORNING
May 1, 2025

On the 1st day of May 2025, the following meeting was held virtually, from 9:00 a.m. to 12:00 p.m., before Jamie Young, Shorthand Reporter in the state of New Jersey.

P R O C E E D I N G S

MS. ABERNATHY: Good morning, everyone. Welcome to the Virtual Hearing for Negotiated Rulemaking. On behalf of the United States Department of Education, we welcome you and look forward to hearing your comments and feedback. My name is Tamy Abernathy, and I have the honor of introducing you to Mr. James Bergeron, who currently serves as the Deputy Undersecretary of Education and Acting Undersecretary. Now you've heard of a jack of all trades and master of none. We have a James of all trades and master of many. The office of the Undersecretary coordinates policies, programs, and activities related to the Office of Postsecondary Education, the Office of Career Technical Education, Adult Education, and Federal Student Aid, and is charged with planning and policy responsibilities to implement the President's higher education agenda. Prior to joining the Department, James served as President and Chief Executive Officer of the National Council of Higher Education Resources and Share, which represents state, nonprofit, and private higher education finance organizations that provide a holistic approach to student success from administering 529 College Savings Plans to operating state-funded grant, loan, scholarship, and college access and success programs for first-generation

low-income students. Prior to 2014, James worked as the Director of Education and Human Services Policy for the House Committee on Education and Workforce, where he developed and managed the committee's legislative agenda in all areas of education and human services policy, including the reauthorization of the Higher Education Act, Carl D. Perkins Career and Technical Education Act, Elementary and Secondary Education Act, No Child Left Behind, individuals with Disabilities Education Act, Education Sciences Reform act, Workforce Investment Act, Workforce Innovation and Opportunity Act, Assistive Technology Act, Head Start Act, and other Federal laws governing preschool, elementary, secondary, and postsecondary education. He received a Bachelor of Arts in Political Science from the University of Louisiana at Lafayette. Now, we certainly will benefit greatly from your wealth of knowledge and experiences, sir. Please join me in welcoming Deputy Undersecretary of Education and Acting Undersecretary James Bergeron to the podium.

MR. BERGERON: Thanks, Tamy. Good morning, everyone. Thank you for joining us today. On behalf of Secretary Linda McMahon, I am pleased to welcome you to this public hearing on Negotiated Rulemaking for the Department. I'm joined today by other Department officials, as you guys know, Tamy Abernathy,

as well as Jeff Andre from the Office of Postsecondary Education, and Karen Bauer from the Office of General Counsel. This is the second public hearing that we're convening to gather comments on potential topics regarding regulations that govern Title IV programs, as authorized under Title IV of the Higher Education Act of 1965, as amended. Please refer to our Negotiated Rulemaking website for additional details about this hearing and other information related to the process. Two months ago, Secretary McMahon tasked the Department and its leaders with bringing back common-sense solutions to postsecondary education and leveraging innovation to reduce college costs. As a businesswoman, the Secretary understands that higher education must lead to a well-paying career and that students and families should have a measurable return on investment. Unlike most commercial industries, where new startups regularly disrupt legacy companies, and competition creates an ecosystem of innovation to better serve students, today's higher education system has become overregulated and a little unfocused. At the heart of these problems are Federal regulations, red tape that force institutions to take on large administrative and personnel costs and hike tuition. Students are customers for colleges, no doubt, but they're rarely treated that way. Rather, colleges and

universities are forced to prioritize compliance with government regulations. That's why you're all here today as stakeholders who care about students and institutions, to make your voices heard through public comment and tell us about your experiences dealing with these regulatory burdens. To that end, the Department is soliciting feedback- specific feedback on ways to streamline Federal financial aid assistance that will maintain or improve program integrity and institutional quality. We're also looking for feedback on several regulatory proposals to align Federal student aid programs with the administration's priorities and clarify language on repayment plans impacted by recent legal decisions. On Public Service Loan Forgiveness, the Department is interested in ensuring that motivated public servants, who have dedicated their careers to critical services in government or nonprofit work, are able to continue to participate in these programs through qualifying employers who are not engaged in illegal activities. We are especially interested in feedback on how to best amend the definition of a qualified employer, to exclude those employers who engage in, perform any activity with the substantial illegal purpose. The Department also seeks to clarify the terms mentioned in the executive order for the purposes of determining PSLF eligibility.

On repayment plans, the Department would like to discuss those improvements included in the final rule establishing the SAVE or Saving on a Valuable Education repayment plan, around family size and other provisions. Those provisions were struck down by the US Court of Appeals for the Eighth Circuit and recently upheld by the US District Court for the Eastern District of Missouri, though they were not the subject of the suit. We also seek further feedback on further ideas for better aligning Income Contingent Repayment and Pay As You Earn repayment with the requirements of the law. Finally, the Department is interested in exploring ways to streamline Federal regulations to foster innovation and reduce college costs while maintaining institutional integrity and quality. The Department, in conjunction with the administration and Secretary McMahon's priorities, is eager to increase affordability and accessibility across the P-16 education system. In postsecondary education, the Department aims to empower states and institutions to reduce barriers to entry and completion and control, or better yet, reduce the cost burden of postsecondary education in the United States. The Department welcomes public input and innovative ideas on this important topic. In addition, we welcome ideas from all stakeholders on how to best improve your experience and

better improve affordability. For example, borrowers, what changes can we make to repayment plans that impacts you financially? How do they shape your decisions after graduating college? College leaders, what accreditation challenges do you face? Financial aid administrators, are there any improvements that we could make to rules around financial responsibility or change in ownership to simplify the process while maintaining program integrity? State officials, how can we best support and empower you to make the college system in your state world class? How can we reduce barriers? And taxpayer and public interest groups, how should we reform the Public Service Loan Forgiveness program to align with the President's promises? In all of this, your engagement will be essential. Today, everyone who wants to be able to contribute and provide comments will be able to do so, and our agency staff will be here to listen. With so many affected, it's appropriate that this process is fully collaborative. Together, we can build a higher education system that's cost effective, innovative, and inclusive, supporting all learners, whether those are pursuing traditional degrees or taking alternative postsecondary pathways. So once the public comment period is complete, the Department will publish a notice in the Federal Register bringing these issues and others that might be

added at the public suggestion before Negotiated Rulemaking committee. And we will also seek nominations for a committee, and we hope that you and your colleagues will consider serving in that capacity at that time. During the in-person negotiation process, the Department will provide issue papers on subjects that will be covered and will provide draft regulatory language for discussion, which will serve as the basis for proposed and final rules. Just like today, stakeholders will be invited to contribute to the process. It's important to keep in mind that the Department anticipates creating multiple regulatory committees over the next year, so there will be ample opportunities for participation by the higher education community and the public. Today, we continue this public comment period, building off Tuesday's public hearing as the first step in crafting rules that will reduce compliance burdens, lower college costs, and foster innovation. Yes, we're heading into what can become a slow, bureaucratic maze. This rule making process will require hard work and careful thought. But on a happier note, we know how impactful this process will be for students when we reach the end. The final rules or rules will advance educational opportunity for millions of students, and their families, begin to reverse the ongoing problem of rising college

costs, and provide a path for institutions to truly innovate without the heavy hand of the Federal government looking over your shoulder. Thank you for your commitment to this process. I look forward to your insights and to forge a brighter path for American education. So, before I turn it over to Tamy, I want to go over the logistics for the speakers for today's hearing. Tamy will call your name. When it is your time to speak, please begin by providing your name and your affiliation. You will have three minutes. She will provide a 20-second warning and inform you when the three minutes has ended. If you exceed your time, we may mute you. You may turn on your camera when presenting if you wish. We do ask that you turn off the sound for the public meeting site, because there is a few second delay on the public meeting, and the public may have difficulty hearing you. When you're speaking, you may not initially hear yourself, but after a few seconds you will hear yourself on a delay. This hearing is being transcribed, and we'll post a transcript on our website within the next few weeks. We'll also provide a recording of the hearing that will include audio and video. Closed captioning is also available in real time during the hearing. This is a public hearing, and it's possible that a member of the public may record your remarks and post edited clips of them before or

after the Department posts the full unedited hearing. And just a few more housekeeping items, we've extended the written public comment through May 8th. We have three scheduled breaks today, one at 10:30 to 10:45, another during lunch from 12 to 1, and then from 2:30 to 2:45. Breaks may be extended if we do not have commenters scheduled. So, with that, we'll look forward to hearing your comments. Thank you for your time and for sharing your information with us, and we look forward to a productive day. With that, I'll turn it over to Tamy.

MS. ABERNATHY: Thank you, James. As he mentioned, I'm Tamy Abernathy. I've worked with Federal student aid and loan programs since 1986, 39 years, and I'm the director of the Policy Coordination Group team in the Office of Postsecondary Education. And my team works on policy matters related to the Federal Student Loan programs. On behalf of the Department, we thank you again for joining us today. This concludes our introduction. Our first speaker is Adaku Onyeka-Crawford. And if I have mispronounced your name, my sincerest apologies. If you had read it yourself, and let me know when you're ready, we'll start the clock.

MS. ONYEKA-CRAWFORD: Hello. Good morning and thank you for allowing-

MS. ABERNATHY: You have three

minutes.

MS. ONYEKA-CRAWFORD: Okay, great.

Thank you. Good morning. My name is Adaku Onyeka-Crawford, and I'm here to testify in support of programs that encourage college graduates to pursue careers in the public interest, including broad Income Based Loan Repayment plans and Public Service Loan Forgiveness. And full transparency, I participated and benefited from both these programs, and during my nearly 15 years in public service, I connected working-class Americans to job training and educational programs to build their self-sufficiency and break the cycle of generational poverty. I've also represented students who have been discriminated against because of their race or sex, including a pregnant student who had been kicked out of school, and a high school student who was expelled for telling administrators she was forced to engage in sexual conduct on campus. These are not lucrative cases to take on, but they're vitally important to ensure that every student has access to equal educational opportunities and that folks who have been historically marginalized have opportunities to succeed and thrive in meet the American Dream. At the same time, the Public Service Loan Forgiveness Program allows individuals to participate to have families, buy homes, and even fully participate in

American life outside of work. And so, these programs are vitally important. They serve the public good while also allowing college graduates to also have economic opportunity. And I would just urge the Department to think broadly about what nonprofit status is and what programs can participate in the Public Service Loan Forgiveness Program, and not to target certain organizations because of the work that they do. Students, workers, many people, continue to be historically marginalized and currently marginalized, and there's still more work to do to lift people out of their disadvantaged status. And that is something that should be rewarded and not penalized because of the way that they do it. And that is all that I have prepared to talk about. And I just hope that this Negotiated Rulemaking process is broad and encompasses all the views of a diversity of stakeholders, including people who represent civil rights organizations, people who represent worker rights organizations, people who represent individuals who have been historically marginalized, because those are people who have lacked access to opportunity. And those are the people who benefit from these public good programs. And with that, that's all I have for my remarks. Thank you.

MS. ABERNATHY: Thank you for your

comments. Tamara Murphy?

MS. MURPHY: Good morning. Thank you for the opportunity to come and address you today. My name is Tamara Murphy. I am a special education teacher. I was late to becoming a teacher. Prior to that, I was an army wife, three young children, and I was the FRG leader for my husband's unit. My husband then got hurt after serving for almost ten years, and he was medically discharged from the Army. So, I taught preschool for a little while in a Head Start classroom to try and help support my family during my husband's recovery. My Head Start classroom was blended and co-taught with an intervention specialist and special education. I discovered that I loved it, I was not making enough money doing Head Start and preschool and decided to return to school under the promise of Public Service Loan Forgiveness. I should be eligible for loan forgiveness in August, after having taught special education in self-contained classrooms for some of our most significantly support meeting students for nearly ten years now. But instead, I'm caught in limbo because of having been forced into the Save Plan and all the things going on. Loan forgiveness was the reason that I returned to school, and now, if I do not get my forgiveness soon, I'm going to be struggling to help my own children as they

are now entering college. I do feel that we should consider having the saved time that we've all been stuck in limbo count towards forgiveness. In the last ten years, I have been making my payments, but at this point, my balance is still more than I originally borrowed because of some of the interest compounding and what my payment was set at based on Income Based Repayment because our family was low income. I chose to go into special education because my family has always been a type of family to serve. My husband in the army, my son is looking at enlisting when he graduates, it's the type of family we are. But I could have picked a degree that would have paid a lot more. My student loans are more than I make per year. If I did not have my husband's VA money in our income, we would have been below the poverty guidelines for a family our size, even on a teacher's salary. Teaching is not a lucrative field, and I think we all know that. But that's not the reason that we go into it. After ten years, I do feel that my forgiveness should go through. And I'm hoping that the board continues to champion these programs as they (20 seconds) recruit- as it is a good recruitment tool to get people into these fields with shorted pay. I feel it's like my husband's GI Bill. It allows me to do service even though I'm not physically capable of serving our country in the same

capacity he did. Given the current teacher shortage, I hope you will continue this program and thank you so much for your time.

MS. ABERNATHY: Thank you for your comment. Can you turn your camera off? Thank you. Rachel Patrick? Rachel Patrick? Christopher Laureano?

MR. LAUREANO: Hi. Can everyone hear me, okay?

MS. ABERNATHY: Yes, sir. You have three minutes.

MR. LAUREANO: Thank you. My name is Christopher Laureano, and I work as the director for a training and internship program at Baco Human Services in Boston, Massachusetts. I would like to bring up a few points regarding the usage of the Higher Education Act to make improvements on PSLF and increase its efficiency. I would like to start by bringing briefly up my experience with enrolling in PSLF. I had graduated from college with a bachelor's degree in 2015, and I remember knowing a little bit about this program, but not having a full understanding about how it works. It wasn't something that was brought up to me by anyone from high school or college. It was something that I vaguely bumped into online when I was looking for resources on student loan repayment plans after college graduation. I finally

enrolled in PSLF in September of 2017 based on my full-time job, but I never felt like I fully understood what I was supposed to do to have my payment counts updated. So, I left it alone. However, it wasn't until the limited waiver occurred in 2021 that I fully realized how PSLF operates, and how important it was for me to catch up on my payment counts through one time form submissions for all my employment. To me, I felt like this was a Godsend that I needed to be closer to getting my life back on track. And I'm forever grateful and thankful for this assistance I received. However, I've seen over the past few years, multiple reports online and on the news regarding continued funding for the Department being reduced and stalled during the previous administration because of various congressional budget reconciliation bills that were voted on. Additionally, I've experienced various issues with Federal Student Aid, including the help tool not working and being told that there was missing information on my PSLF forms when this was not the case. When comparing all these issues that I brought up with what the current administration is proposing for PSLF, it's very clear to me that these events occurred with purpose and intention, and that the idea of improving efficiency for PSLF is really another code phrase for saying that it should be restricted in some

way or eliminated entirely. What was proposed for the executive order for this program is to restrict eligibility, so that it aligns with what the administration wants, based on their harmful rhetoric. This is in addition to the executive orders to gut both the Department and any programmatic assistance in dealing with issues like mine. At this point, I'm thinking of not only myself, but those who are going for loan forgiveness to make student loan payments work for our budgets, and how much we will be struggling if this option is ripped apart from us. This is exactly what will happen if we change PSLF to the degree that it becomes inaccessible for so many of us, because of harmful rhetoric being spewed by an administration that is advocating for more pain and suffering. So, if we truly want to talk about improving efficiency for the program, I suggest we talk about ways to expand education nationally on loan forgiveness programs and to provide more support for resources and entities that can help make PSLF run more smoothly. I'll be more than happy to be a part of this effort, because to do this is to truly embody the definition of efficiency. Thank you for your time.

MS. ABERNATHY: Thank you for your comments. Allie Wegner?

MS. WEGNER: Good morning, everybody.

MS. ABERNATHY: You have three minutes.

MS. WEGNER: Thank you very much. I join you here today to express my strong support of the PSLF program in the Income Driven Repayment Programs that make it possible. My name is Allie Wegner. I'm a policy researcher, public program evaluator, and current PhD student. And I'm also someone who's tried to do everything right as a student and financially. For my undergraduate degree, I moved almost a thousand miles away from my hometown to the University of Oklahoma, where I could have a scholarship that would cover my expenses instead of staying closer to home and going to a more prestigious institution. While there, I got my undergraduate degree in mathematics, which I chose because it was a highly employable field, led me to a passion for public service. I joined Teach for America. I moved to Kansas City, Missouri, where I was a Head Start educator. And in that time realized that my students and families deserve more than I could give them in the classroom alone. So, I did what a lot of teachers do. I took on personal expense to make sure my kids and families had what they needed. I paid out of pocket to go to my get my master's in education policy at an Ivy League institution, because that's where I knew I could

make the most impact, learn the most, make the kind of connections that would enable me to make a difference. Since then, I have worked in education research. In fact, my current role is as a program evaluator, working with government agencies to ensure that we are efficiently using our resources. And one of the most important resources that we can be leveraging is our young people, our bright people, our students who are working their best to put all that effort back into public service. I will keep it brief and leave it there. But just want to say that I urge us to continue this important program and to enable all these great people to continue working toward this collective future.

MS. ABERNATHY: Thank you for your comments. Alyse Hammonds. Alyse Hammonds, you have three minutes.

MS. HAMMONDS: Hi, yes. Thank you. Good morning, everyone. I came to talk about student loan debt. As a Community Action Council member for the Project on Predatory Student Lending, I am privileged to have lived through predatory student lending and overcome it. We all know that higher education has become so expensive. The average family simply can't afford it without taking on serious debt. Scholarships, grants, work study, and yes, loans are now the normal path. But

this system assumes every school is playing fair. And I'm here to tell you, many aren't. In fact, many schools have learned how to profit from the system not by educating, but by exploiting. I was accepted into a law school program in Phoenix, Arizona, with what I thought was a relocation scholarship. I'd already earned a full tuition scholarship for undergrad, and I believe the offer was legitimate. But once I enrolled, that scholarship turned into a loan, and not long after that, the school lost its accreditation. The courses I spent over \$200,000 on became worthless and nontransferable. That school later declared bankruptcy, but my debt ballooned to over \$300,000. For over 12 years, I kept my loans out of default, using Pay As You Earn Plan. I was also pursuing Public Service Loan Forgiveness as a local government employee. I experienced homelessness, I was underemployed, I couldn't qualify to buy a home, and my dream of becoming a lawyer, a dream I worked so hard for, was stolen from me. In 2020, I became part of the Sweet V Cardona class action. Through Borrower Defense, my debt was finally cleared in July 2024, 12 years after leaving law school. In September 2024, I purchased my first home. But now that lifeline is under threat. If we eliminate PSLF, PAYE, ICR, and Borrower Defense, future borrowers won't have the options I did. They'll be trapped often by

predatory schools that exploit the system for profit. Let's be clear, these programs aren't handouts. They're safeguards. They hold institutions accountable when they mislead or defraud students. In every other industry, if a product fails, the company is responsible. Why should education be any different? We need to protect these programs, not just for those already in debt, but for every future student chasing a better life. Education should lift people up, not lock them into lifelong debt. Thank you.

MS. ABERNATHY: Thank you for your comments. Jenna Wyatt. Jenna Wyatt.

MS. WYATT: Good morning.

MS. ABERNATHY: Good morning. You have three minutes.

MS. WYATT: I'm here to speak on the PSLF program definitions. I'm an assistant professor at a community college and have been teaching for ten years. Educators do not see the raises the way folks do in the private sector. Our institutions largely rely on the funding received through the state, and in fact, my institution has offered food banks to its faculty in the last few years because they would not give us a raise. A food bank doesn't pay my student loan bill. The average cost of a one-bedroom apartment in South Florida is over

\$2,000. An assistant professor's base salary cannot cover their basic needs and live in a one-bedroom apartment. Instead, I teach extra pay classes every semester that's beyond my workload, and in the summer, to make ends meet. Between skyrocketing costs and several years in between minimal raises, programs like PSLF ensure that educational institutions have faculty. Community colleges give back to their local communities, and we educate students and prepare them for the workforce at an affordable cost. But who sacrifices? It's the faculty. My institution has lost several professors due to the low wages and high cost of living. As of April 15th, I am six payments away from attaining Public Service Loan Forgiveness. Six. I requested to switch back to the Income Based Repayment Plan in January because the SAVE Program is caught up in the courts, and I am still five months later, waiting for MOHELA to process my application. MOHELA blames the nearly half-year wait on being "backlogged." And I'm not the only one in this situation. The waiting game adds undue stress to hardworking Americans who qualify for this program. But now, with the two vague executive orders, even professors are at risk of being removed from this program. What if a student whose brain isn't even fully developed yet decides to peacefully protest on our campus? Will the

faculty be punished and removed from PSLF? I urge the Department to keep professors and educators on the Public Service Loan Forgiveness program, and to accelerate their applications. When we educate our communities, we all thrive. Let's help the very ones who propel people to succeed in their careers. Lastly, I sincerely believe that this nation was founded on Christian principles, and I'm reminded of the parable that Jesus told in Matthew 18. A servant had his debts forgiven and went after a man who owed less than him when he had been forgiven. Now the forgiven man had the one with fewer debts thrown in jail. When the master found out, he threw the wicked man in jail for his lack of forgiveness. When politicians in our country have filed bankruptcy and seek to prey on those second loans and public service, we have lost sight of a Godly principle. We have lost sight of serving the American people. Thank you.

MS. ABERNATHY: Thank you for your comment.

MS. WYATT: Thank you.

MS. ABERNATHY: Betsy Mayotte? Sorry if I mispronounced that. Betsy Mayotte?

MS. MAYOTTE: You did well.

MS. ABERNATHY: Oh, thank you. You have three minutes.

MS. MAYOTTE: Thank you. My name is Betsy Mayotte, and I'm the president of the Institute of Student Loan Advisors, a nonprofit whose mission is to provide free student loan advice and dispute resolution to all consumers. I've been working in the student loan industry in a compliance or advocacy role for over 25 years and have worked with thousands of borrowers who struggle with their education debt. Over the last several years, student loan borrowers have experienced and continue to experience the most chaotic and confusing period in the history of the Federal Student Loan programs. One of the consequences of this chaos is borrowers finding that they are losing months that should count towards either PSLF or IDR loan forgiveness due to events out of their control. While the promise of buyback has been made, these borrowers must go through an arduous process to request this buyback and wait months to see a possible result. I'm requesting that for any period where a borrower is put in an administrative forbearance, that these months count towards loan forgiveness. Alternatively, I'm requesting that these borrowers receive an immediate buyback offer at the end of these forbearance periods without the need for the borrower's request. If the borrower was already an active repayment and on an eligible plan, the servicer should have the

data they need to quickly make such an offer. And as the borrower would have normally been due for payments, the borrower should have the funds to fulfill the offer if they should choose to. This change would stop the harm to borrowers and reduce the administrative burden for both borrowers and servicers. In addition, if borrowers choose to make their regular payments during these administrative forbearances, it should be treated as a buyback already fulfilled, and the month should be counted towards both PSLF and IDR forgiveness. I'm also requesting that this neg-reg session adjust the loan rehabilitation requirements to make the eligible payments equal to whatever the lowest payment option amount that would be available to borrower post rehab. In 2015, good intentions changes allowed for rehab payments to reduce the payment based on the borrower's income and expenses. As reducing payments based on expenses is not a feature of any repayment option, we have set these borrowers up for defaulting on their loans, as they can't get a payment as low as their rehab payment once out of default. As rehab can only be done once, and collection costs can be added every time, we are harming rather than helping borrowers in this situation. By tying rehab payments to the lowest payment available post rehab, we are setting the borrower up for success, as well as

getting them into the habit of making this payment in this amount. My third request applies to Perkins Loans. But the wind down, I am seeing an alarming number of borrowers who have not received bills on their Perkins for decades, only to receive a bill recently. In some cases, the borrower's loans have been paid off or forgiven under the Perkins program many years before. One borrower we worked with received a bill for over \$1 million after having their loans forgiven for teaching in the late 90s. Schools should have penalties, much like FFEL lenders do when they fail to perform due diligence on Perkins loans. Borrowers should not be held liable for these loans in these situations, much less the interest and fees during this period. Finally, I ask that you take this opportunity to codify the requirements for both the cancer treatment deferments and the joint consolidation separation process. Thank you for your time and the privilege of being able to submit comments on these important issues.

MS. ABERNATHY: Thank you.

MS. RIFFLE: Are you ready for me?

MS. ABERNATHY: Yes, I am. Thank you so much. If you'll give me one second, however, I'm having a bit of a difficulty trying to get my screen to load. So, hold on.

MS. RIFFLE: Okay, I was worried my speakers were muted.

MS. ABERNATHY: All right, Ms. Rachelle, thank you for your patience. You have three minutes.

MS. RIFFLE: Thank you. And I appreciate being here. My name is Rachelle Riffle. I'm from Salt Lake City, Utah, and I'm here today to comment on Public Service Loan Forgiveness and the Income Based Repayment Plans. I feel it's important to remind lawmakers of the human stories behind the changes they are proposing. And to be honest, I'm very angry. I'm angry at you. I'm angry at Congress, and I'm angry at those who have been content to hang us out to dry but are happy to benefit from what we contribute to our communities. I'm angry that we are the near constant strawman and easily blamed scapegoat in any argument about government assistance programs. I'm angry that no one has taken any time to put their biases aside and consider what would benefit us, and continue to benefit, and allow us to continue to serve our communities. For the last nine years, I've worked a thankless public job assuring that the rights, safety, and welfare of participants in clinical trials are protected. However, the messaging from the current administration is that

that is not enough, that I and countless others like me have not given enough. The purpose of Public Service Loan Forgiveness is to attract new graduates to lower paying jobs in the public sector by providing a way for them to repay their loans, both monetarily and through their services rendered to the public. So much of the discourse around student loans and forgiveness from our own Congress members has been what it costs the taxpayer. Now, I know we are a capitalist community and a capitalist country, but services rendered do still have value. And for the sake of the taxpayer, I broke down some numbers. Since 2007, \$46.8 billion have been forgiven under PSLF. And from 2022 to 2023, \$755 billion in PPP loans were forgiven. That's 16 times the amount forgiven under PSLF. If broken down per borrower, the average amount that's been forgiven through Federal programs is just over \$1,000 per student, compared to the average \$72,000 per PPP loan. It's objectively false to claim that any concern about Public Service Loan Forgiveness is merely a concern for the US taxpayer. We need public servants, and we should make it easier for public servants to qualify for Public Service Loan Forgiveness. Lastly, the new proposed student loan repayment overhaul put forth by Republicans this week is, to be frank, offensive and cruel. Not only have most of

us been in an involuntary forbearance that does not count towards our PSLF, now we're having nearly all our repayment options stripped from us. The fact of the matter is, the SAVE Plan offered the most reasonable repayment plan for those of us in these lower paying jobs. We've been dragged through the mud due to this political infighting. (20 seconds) . And if the point is to reduce the burden on the taxpayer, then our burdens should be the priority. Since, like I demonstrated, we the borrowers, are the ones shouldering the burden of repayment and always have been. Thank you.

MS. ABERNATHY: Thank you for your comment. Ron Reed?

MR. REED: Hi, good morning.

MS. ABERNATHY: You have three minutes, sir.

MR. REED: Okay, thank you. Good morning and thank you for the opportunity to speak. Again, my name is Ron Reed. I am from Pleasant View, Tennessee, and I'm a veteran of the United States Navy and a registered nurse who has spent over 27 years caring for our communities, including more than two decades at Vanderbilt Medical Center and Vanderbilt Children's Hospital. My career has been dedicated to helping others. I'm not here to ask for a free ride. I'm just here to ask

for fairness, for a repayment system that allows borrowers to repay their loans without being buried under compound interest. I want to acknowledge that student loan reform is evolving. Policy rules, forgiveness criteria seem to change almost daily. If I mention something no longer applies or has since been updated, I sincerely apologize. My intention is to not mistake the facts, but to share my experience and the frustration that comes from trying to navigate a system that feels like it's constantly shifting under our feet. When I graduated, my student loan balance was \$54,000. Today, despite making payments, my balance has grown to over \$72,000. And that's not because I borrowed more. It's because of the years of interest accumulation and deferments. Recently, I started making payments back in November of 2024 to Nelnet, my student loan provider, and have paid nearly \$3,000, and not a single dollar has gone towards principal. Every penny has gone to interest. That's not repayment, that's entrapment. This is financially and emotionally draining. Sometimes I get a little choked up talking about it. I've dedicated my life to service, yet I feel like I'm being penalized for trying to further my education. And I'm not far from alone. Many of us are in the same cycle, working hard, making payments, and watching the balance climb. I

respectfully ask, why is the government profiting off student loan interest, not just from veterans or healthcare workers, but from anyone who sought to better themselves through education? Interest shouldn't be a tool for a profit. It turns opportunity into a lifetime burden. To be clear, I am not opposed to student loan forgiveness. I would love for myself. I too support efforts that help people that truly need it. But I also believe we need a system reform that make repayments possible for us who want to pay what we owe. I owe my debt. I want to pay it back. But I need a system that doesn't make that impossible. I was even denied Public Service Loan Forgiveness. Not because I didn't owe, but because. Let me skip over. I'll just go to respectfully ask the Department to consider these changes. Stop charging interest that prevents borrowers from touching the principal. Explore removing interest entirely from Federal Student Loans. Structure loans so monthly payments reduce what the borrower's borrowed.

MS. ABERNATHY: Time.

MR. REED: Oh, okay. Thank you.

MS. ABERNATHY: I'd like to remind everyone that you are still able to submit written comments. So, if you do run out of time and you feel it is important, please make sure that you submit a written

comment before the 8th of May. Donna Gurnett? Donna, you have three minutes.

MS. GURNETT: Thank you. Good morning and thank you for the opportunity to testify today on behalf of the Coalition of Higher Education Assistance Organizations. My name is Donna Gurnett, and I'm the executive director of COHEAO. COHEAO represents a partnership of colleges, universities, and organizations dedicated to promoting student friendly, campus-based loans, tuition payment programs, sound regulation of student financial service operations, and best practices in campus accounts receivable management. We appreciate the opportunity to respond to the Department's request for topics and ideas that would streamline current Federal student financial assistance programs. COHEAO will be submitting full written remarks outlining our ideas and suggestions. So, in the interest of time, I'll limit my remarks today on just a few of our ideas. First, we'd like to commend the Department's recent announcement on resuming collections on Federal direct student loans. Resuming collections after a five-year pause is a difficult but necessary step to preserving the integrity of the Title IV Student Aid program. This will require creative and forward-thinking solutions and partnerships. COHEAO encourages you to look at all available tools to

support this massive effort, including regulatory relief, as it will take an all-hands on deck approach if the return to repayment is to be successful. For instance, COHEAO urges the Department to reconsider the two-year mandatory assignment policy for outstanding Perkins Loans. This mandate creates administrative challenges for some institutions and negatively impacts student borrowers by disrupting established servicing relationships. We recommend an approach allowing institutional discretion in assignments, especially for loans less than ten years in repayment, as they remain highly collectible. Also, while the prohibition on transcript withholding aims to safeguard student access to academic records, it can also create unintended financial burdens for institutions and hinder effective debt recovery efforts. Students who fall behind on tuition payments are often at greater risk of defaulting on their loans after graduation. Institutions are deeply committed to student success and actively promotes financial literacy to reduce student debt and minimize defaults. Ongoing communication is critical to this effort. The ability to temporarily withhold transcripts as previously allowed often prompted students to engage with their institutions, seek assistance, and establish payment arrangements. In closing, COHEAO stands ready to

work with the Department to develop policies that both protect students and provide institutions with tools necessary to support student success. We appreciate your consideration of these recommendations and your continued commitment to improving higher education outcomes. Thank you again for the opportunity to share our perspectives today.

MS. ABERNATHY: Thank you for your comment. Kristin Tremmel?

MS. TREMMEL: Good morning.

MS. ABERNATHY: You have three minutes.

MS. TREMMEL: Thank you. Good morning. My name is Kristin Tremmel. I am a nurse in a very large 501(c)(3) nonprofit healthcare organization. I have tailored my career around the privilege of public service. I dearly love what I do, and I am privileged to care for those less fortunate than myself. I have also tailored major financial decisions, such as purchasing a home around the existence of PSLF. The nonspecific threat of the removal of this designation really concerns me. I have nearly come to the end of my obligation and, like many others, am caught up in this mess of litigation and squabbling that have ground to a halt those of us who are almost at the end. PSLF and the coexisting Income Related

Repayment Plans present opportunities for many people to pursue professions like nursing and medicine, who might otherwise not be able to afford them. PSLF encourages people like me to use that education and give back to the public good in the form of not only reasonable loan payments, but also in the service to our fellow Americans. There's noise out there that says we do not want to repay our loans, or that the taxpayers should not be on the hook for these loans. Nothing could be further from the truth. Many folks have been paying on these loans to the point where they have paid back more than what they borrowed. And yet, due to the predatory nature of the structure of these loans, they still owe appalling amounts of interest. Income Related Repayment Plans are a light at the end of the tunnel for us. As I stated before, there is a large swath of people who have been pursuing PSLF and are so very close to the end, myself included. We are held in what has colloquially been known as- come to be known as SAVE purgatory due to the mess of litigation that is in play. I signed a promissory note that stated that if I made 120 qualifying payments while working for a qualifying employer, the balance of my loan would be forgiven. I have done this and more. My record shows 112 payments, with the remainder being tied up in the unrequested unqualified forbearance placed on my

account as a record of the ongoing litigation. I have never wanted to give money to anyone so badly. (20 seconds) I realized that changes must be made. The cost of college must be reined in, but it should not be done on the backs of people who have already given so much, only to have the metaphorical rug pulled out from under us. Millions of me- millions like me, have held up our end of the bargain. It's time for the government to do theirs. Thank you.

MS. ABERNATHY: Thank you for your comments. John Foor? John Foor?

MR. FOOR: Good morning.

MS. ABERNATHY: Good morning. You have three minutes.

MR. FOOR: Thank you. Good morning. My name is John Foor, and I'm speaking on my own behalf. Thank you for the opportunity. There are likely members of many stakeholder categories present today. I offer my comments as a member of what I believe to be the most important of those categories, which is borrowers themselves. Student loan borrowers are a vulnerable population. To be sure, we all have committed to the terms of master promissory notes, but other stakeholders in this system have far more power than we do in dictating the execution of those terms in practice. I

speak primarily of the Federal government and of the for-profit and quasi-governmental debt collectors with whom it contracts. Under multiple administrations, Democratic and Republican, we have been made promises about our loan repayment options and have seen those promises broken. At nearly every turn, we have been given information about our obligations by those managing our debt that has been inconsistent or, in the worst cases, simply untrue. For years, millions of borrowers like me have attempted time and again to proactively communicate with the Department and its servicers about our debts, only to be met with contradictory instructions or no response at all to our inquiries. These problems are now being exacerbated by an administration that treats vulnerable populations like student borrowers with contempt. Many borrowers are members of multiple vulnerable populations, compounding their legitimate fear of interacting with the government. All the while, our options for affordable repayment arrangements continue to dwindle, and borrower protections are rescinded. In considering any rule changes, the Department and other stakeholder groups represented here today have an ethical and indeed a moral obligation to protect borrowers and aid them in their repayment. Contrary to the lazy yet pernicious trope of the irresponsible borrower that so many are eager to

perpetuate, most borrowers in delinquency or default are not intentionally shirking their obligations. They are confused by and afraid of interacting with the system that has failed them so profoundly for so long. More affordable, more affordable repayment options and more borrower protections, not fewer, is the answer to this question. Clearer and more consistent guidance from the government and its contractors, including better staffed and better supervised customer support, is also the answer. I end with a special comment about Public Service Loan Forgiveness. PSLF is not a courtesy that the Federal government extends to borrowers. PSLF is a guarantee that the government made to us. A guarantee borrowers like me took into consideration when deciding to assume our debt in the first place, and subsequently, around which we have constructed our entire professional lives and livelihoods. Borrowers like me have upheld our end of the bargain by working in underpaid and underappreciated occupations for years in service to our fellow Americans. It is now the government's responsibility to uphold its end of the bargain by honoring its guarantee. Meaning making PSLF more accessible, not less, to those who have earned it. Thank you very much.

MS. ABERNATHY: Thank you for your comments. Michael Smiley? Michael Smiley?

MR. SMILEY: Can you hear me now?

MS. ABERNATHY: Yes. You have three minutes.

MR. SMILEY: Alrighty. When does that start? This second?

MS. ABERNATHY: Right now.

MR. SMILEY: Okay. All right, start talking? Sure.

MS. ABERNATHY: Yes, please.

MR. SMILEY: Hi, I'm Mike Smiley, and I'm here today to speak in support of the Public Service Loan Forgiveness Program. After earning my bachelor's degree in 2001, I attended medical school at Saint Louis University and earned my MD in 2005. After my first year of medical school, I commissioned in the Navy as part of a scholarship program. However, I had preexisting loans from my first year of medical school and undergraduate degrees. Despite the military scholarship did not cover all necessary expenses to attend. My wife was also in graduate school during this time, pursuing her master's in social work. After med school graduation, I served in active duty for the Navy for 14 years from 2005 to 2019, and joined the Air Force Reserves, where I continue to serve. Throughout my entire time in the Navy, my wife and I were trying to figure out how to manage our student

loan debt with a growing family. She had to give up her career due to our frequent moves. We (inaudible) eight times from 2005 to 2019. I first learned about PSLF around 2014. When I inquired about the program, my loan servicer told me I couldn't utilize it because I had what was called FFEL loans. Every time I reached out to ask questions, it was never explained to me that I could consolidate these loans into Direct Loans to make use of the program. They just said I didn't have the right type of loans to be eligible. This deceitful practice by the student loan servicers has been well documented and reported on, so I won't go into that anymore. In early 2021, I heard a story driving to work on NPR that informed me I could qualify for forgiveness through the waiver. After well over ten years of qualifying employment, I did consolidate my loans, and I applied for forgiveness through PSLF. Unfortunately, I ran into challenges getting my military service counted correctly, as the Department was not accepting the standard DD214 as proof of military employment. I was very persistent and ultimately was able to get my employment certification approved. In March of 22, after many check-ins and help from the Department Ombudsman, I was notified I was receiving forgiveness. During this time, I joined a Facebook group for people who are working towards PSLF

forgiveness. I learned of many veterans who were having similar issues getting their military service counted. I worry that people who lack the rank that I had were less persistent or informed than I was, would be unable to fulfill the requirements. Since then, I've helped numerous fellow veterans navigate the PSLF program to get the loan discharge they're entitled to. And they've told me how important this program has been for their families to get away from education debt. I also currently work as a pediatric residency director at Children's Hospital. There's a national shortage of pediatricians, which is multifactorial. A combination of medical school debt and being in a lower paying field are major contributors, though. The PSLF program has been cited by many residents as a factor in their decision to pursue pediatrics and taking away this program would further exacerbate the pediatric shortage our country is experiencing. So, I got cut a little short but thank you for your time. And obviously the PSLF program has been a huge benefit to me and many other veterans and future pediatricians.

MS. ABERNATHY: Thank you for your comments.

MR. SMILEY: Thank you.

MS. ABERNATHY: Sabrina Calazans?

MS. CALAZANS: Good morning. My name

is Sabrina Calazans.

MS. ABERNATHY: You have three minutes.

MS. CALAZANS: Okay. Thank you. My name is Sabrina Calazans, and I'm the executive director of the Student Debt Crisis Center. Student Debt Crisis Center is a national advocacy organization with 2 million supporters calling for fundamental reforms to student loan policies and an end to the student debt crisis. At SDCC, we receive emails and stories from borrowers every day who are panicked by the latest proposals to limit access to public service, loan forgiveness, and Income Driven Repayment Plans. The people being impacted by this crisis are everyday Americans, their individuals and families who sought a better life through higher education. They're farmers, like Lisa, who took out a Parent Plus Loan to put her daughter through college but is now behind on her payments. They're single parents, like Michelle, a single mother of two trying to support her family. They're teachers like Michael, who is still waiting for his loan forgiveness application to be processed. They are firefighters like Joseph, who risk their lives every day, but whose loans from the 90s still haven't been forgiven. There are small business owners like Elise, who attended a predatory for-profit school

who is struggling to meet her basic needs. And they are older Americans like Angela, who's 84 years old and must put off retirement because of her loans. Now, this is just a snapshot of what it looks like to struggle under the burden of student loans. These same folks are now wondering how they're going to afford their monthly payments and invest in their futures if these repayment plans and forgiveness programs are taken away. Attempts to gut these programs and any forgiveness aspect tied to them will effectively increase monthly payments and plunge millions more into default by pulling the rug out from under them. What will happen to these folks? Many are already behind on payments and delinquent. 5 million are already in default, and 5 million more are on the verge of defaulting and being subject to collections. How will removing repayment plans and garnishing people's paychecks and Social Security help Americans? This will only make matters worse, especially for the most vulnerable individuals who are already struggling to stay afloat. We need to make it easier to get out and stay out of default, not more difficult. We need to improve programs and make them accessible to all, not gut them or limit them to only certain individuals. The deal was that if you worked in public service for ten years for a qualifying employer and you made your monthly payments,

your loans would be forgiven through Public Service Loan Forgiveness. The other option was if you paid on your loans for 20-25 years and made the 240 or 300 payments, your loans would be forgiven through IDR forgiveness. Millions of Americans are enrolled in these programs and count on them to this day. Many have had their loans forgiven, but millions more await their turn. We are keeping up our end of the bargain, and now it's time for the government to keep up its end, too. Thank you.

MS. ABERNATHY: Thank you for your comments. Nicholas Dunn? Nicholas Dunn?

MR. DUNN: Hello.

MS. ABERNATHY: Hi, Nicholas. You have three minutes.

MR. DUNN: Okay. I'm James Dunn, but yes, I'm under the other email.

MS. ABERNATHY: You have three minutes.

MR. DUNN: Okay. Am I ready to go now?

MS. ABERNATHY: You have three minutes. Yes, sir.

MR. DUNN: Okay. Thank you. I just wanted to come on and say I have the Income Based Repayment Plans, and it's very important to me because I have two college degrees, but I don't make enough to

fully pay it right now. I am against the student loan forgiveness because I don't think loans should be forgiven because that's not the way it should be. And I just want to thank President Trump for everything he's doing. I think the cuts to DOGE are necessary. But I have a family of five. I have three children. And the Income Based Repayment Plans- our household income is about \$50,000, so we can't afford the increase. I just encourage everyone with Linda McMahon, who I worked on her Senate campaign, to keep that in place, because it is very important., At the rate of the income we make it's very hard to take on the challenge of a new, of a new payment. And my wife is also in student loan debt. I got a degree in business management, with about \$80,000-\$100,000 in debt. And my wife has around \$20,000 with a degree in psychology. I would just encourage all the lawmakers and my great Congressman, Pat Harrigan, to do what they can to try to keep that in place. I don't have much else to say, but I just want to thank President Trump. I think he's doing an amazing job, and I know he's going to do what's right for the American people. Thanks for giving me the chance to share this.

MS. ABERNATHY: Thank you for your comment. Betsy Vogt-Lundeen, or excuse me, Becky Vogt-Lundeen.

MS. VOGT-LUNDEEN: Yes.

MS. ABERNATHY: You have three minutes.

MS. VOGT-LUNDEEN: Becky Vogt-Lundeen here. Good morning. I'm a certified financial planner that works with healthcare professionals. My husband is a resident physician working about 80 hours a week, saving lives, making about \$70,000 a year, and, of course, carrying about half a million of student loan debt. And unfortunately, he isn't alone. Many healthcare professionals who we rely on every single day are in the same boat. This Negotiated Rulemaking is a part of a coordinated political strategy framed as fiscal responsibility. But it's just proposing corporate tax breaks while harming student loan borrowers and increasing the deficit. The 2017 Tax Cuts and Jobs Act alone is projected to add over \$1.5 trillion to the debt or deficit. Republicans are using the budget reconciliation to fast-track Federal spending, but under the Byrd Rule, they cannot push unrelated policy changes like altering statutory programs such as IBR. These programs are grounded in law, and changes must go through Congress and not forced through rulemaking. Borrowers structured their lives, careers, families around these plans. They are reasonably relied on, and these legal

promises are made through their master promissory notes. To change the rules now is unethical and grounds for litigation through reasonable reliance. Even Linda McMahon previously acknowledged that she would uphold congressionally authorized plans like IBR, which includes a payment cap with the standard repayment plan. But today, that promise is being broken, and it's a betrayal of public trust. This budget reconciliation is not about reducing deficits. It's about slashing social safety nets to tax, to have pay cuts for tax cuts, for benefiting corporations. And while they try to cut corners and rewrite these plans, they're allowing for-profit colleges to continue siphoning billions in Federal aid. So, let's be clear, changing Pay As You Earn and ICR to the proposed budget reconciliation without congressional approval is illegal, right? They have not passed anything yet. And using that budget reconciliation to fulfill your political wish list breaks the Byrd Rule through the merely incidental test. And lastly, taking away those repayment plans that borrowers have relied on is unethical and potentially illegal under reasonable reliance. I am asking you to grandfather, in these repayment plans, such as Pay As You Earn, and do not attempt to make changes through this process. As we know, most of the things that this administration is doing and

the way that it's been done is illegal. And the American people will sue, as we've seen with the American Federation of Teachers. Thanks.

MS. ABERNATHY: Thank you for your comments. Syed Ahmed? Syed Ahmed?

MR. AHMED: Hi. Good morning.

MS. ABERNATHY: You have three minutes.

MR. AHMED: My name is Syed Ahmad, and I'm an internal medicine resident in West Virginia. I wanted to highlight the impact the Department's decision to stop supporting Income Driven Repayment Plans would have on medical residents, such as me, and across the country. For my family, we were financially stable for most of my early life. Things started getting difficult for us during college when my parents had to pay for my college education out of pocket. With two siblings also in college and a combined family of seven, we all lived frugally and worked part-time jobs during college. I made it out of undergraduate without loans, but during medical school the tuition doubled, and had to take loans. As of today, I am more than \$150,000 in debt, which is much less than the national average for a resident. Using a standard loan repayment, I'd be paying \$1,400-\$1,500 per month. With an Income Based Plan, this could be \$500 or

\$600 a month, which is way more doable. With our resident's salary averaging \$12 per hour for the 70 to 80 hours we work in a week, and after rent, I am left with \$1,500 for food, necessities, gas and clothing. So, a standard loan payment of \$1400 or \$1500 is impossible. My friend in my residency program, pays \$900 per month just for daycare. I have another friend who has two kids who he must send to elementary school, and another friend who walked for two weeks as he waited for his next paycheck to come in because he couldn't pay the repairs for his car. We have countless stories of residents who are working the most at 70 to 80 hours a week but struggling to make ends meet with the current payments that we're getting. The road to becoming a doctor is 11 to 16 years, with average debt way above \$200,000 for graduates. We have rising tuition costs and tight budgets for 5 to 10 years of our lives during residency. The current system is making it increasingly challenging to become a doctor, especially for those from low-income backgrounds. For medical residents, Income Based Repayment Plans aren't a luxury. They're a lifeline. They don't erase the debt. They make it more manageable, and it acknowledges the reality that students are increasingly avoiding becoming a physician (20 seconds) due to the financial barriers in place. If we start losing doctors before they even become

working in the hospital and clinics, this has significant negative consequences for the healthcare system in the future, I strongly urge the Department to reconsider their decision to stop the repayment program. Without this program, we're pushing out passionate, altruistic people simply because they can't afford this calling. Thank you.

MS. ABERNATHY: Thank you for your comments. Ben Cecil?

MR. CECIL: Good morning.

MS. ABERNATHY: Good morning. You have three minutes.

MR. CECIL: Thank you. Thank you for the opportunity to comment today on the Department's proposed rulemaking agenda. My name is Ben Cecil. I'm a senior education policy advisor with Third Way, and we're a national public policy think tank based in Washington, DC. The regulatory issues raised for consideration by the Department cover a range of topics for which sound Federal regulation is essential to ensuring programmatic and institutional quality, while promoting transparency and accountability for students' and taxpayers' investments in higher education. The Department has shown interest in developing regulatory proposals related to the Public Service Loan Forgiveness Program and Income

Driven Repayment Plans, including the Pay as You Earn and Income Contingent Repayment Plans. Third Way urges the Department to prioritize clarity and consistency for student loan borrowers while adhering closely to these programs' established aims. The Department should ensure continuity and uphold intent for the Public Service Loan Forgiveness Program, a congressionally mandated program or a congressionally established program that provides targeted and earned relief to borrowers serving their communities in careers like law enforcement, firefighting, military service, nursing, or teaching working at approved public service employers as outlined in the PSLF statutory framework. A key challenge as well for the Department is ensuring the continued functioning of the Federal Student Loan Program and bringing borrowers back into repayment. Income Driven Repayment Plans like PAYE and ICR provide practical and vital repayment options for borrowers to ensure an affordable monthly payment, while providing the Department with mechanisms to help prevent student loan default. Additionally, Third Way urges the Department to prioritize auto enrollment of struggling student loan borrowers into IDR programs like PAYE and ICR and implement rules like preventing interest capitalization to keep more student loan borrowers in good financial

standing. Relatedly, we strongly urge the Department to prioritize and implement the gainful employment and financial value transparency frameworks. Prioritizing program level data and common-sense measures for assessing ROI provides a valuable accountability tool to weed out underperforming programs that otherwise high performing schools. The expanded data that will be made available through FBT in the transparency it mandates, gives students and families the decision-making power to pursue college and the ability to compare price and outcome information before they even apply. Third Way urges the Department to maintain all required data components in the final framework and ensure compliance and accuracy. Additionally, the Department should prioritize and allocate appropriate resources to support the website or platform required to house FBT data so that it can be implemented and made publicly available promptly following the reporting deadline. Thank you for your time and consideration of these comments.

MS. ABERNATHY: Thank you for your comments. Cory Nash?

MR. NASH: All right. I am ready whenever you guys are.

MS. ABERNATHY: Three minutes, please.

MR. NASH: All right. Good morning,

everyone, and thank you for this opportunity to speak to you all about this important topic. My name is Cory Nash, and I'm a graduate who is currently paying back their student loans. I want to speak to you today about how changing the definition of a qualifying employer could have an impact on American citizens who are relying on, or will be relying on, Public Service Loan Forgiveness. I'm a pathologist assistant, and the pathologist assistant profession is a niche field of medicine, but as a very simple overview, we have two main responsibilities. One is to dissect tissue to look for things like tumors and diseases, how well patients responded to treatments, but then we also help perform autopsies to kind of give closures to families. Now, the reason I mention this is that approximately 27% of pathologist assistants work in teaching hospitals, and the majority of those are not-for-profit. In a teaching hospital, you have your doctors and your nurses and your pathologist assistants, but you also have many residents. These residents, they enter their program with a very basic understanding of medicine as a whole. But it's during their residency that they become experts in their field and in pathology when it comes to learning about how to dissect and do autopsies, it's the pathologists assistants who are responsible for teaching them these

things. So, if changes are made to the definition of a qualifying employer, I have two concerns and two scenarios that might arise. One is that when medical professionals graduate, they have a variety of settings in which they can practice. One of them being teaching hospitals, but they could also work in a private group. Now, private groups are usually for-profit, and so they don't qualify for Public Service Loan Forgiveness, but they do tend to offer higher salaries to kind of offset that. So, if changes are made to the definition of a qualifying employer, my concern is that more medical professionals would opt to work in a private group and get that higher salary, knowing that, knowing that they don't qualify for PSLF rather than a teaching hospital. It's going to create a mass exodus of medical professionals away from teaching hospitals, and it's going to create a workforce shortage. The second scenario I worry about, and this is kind of more directly related to the first, is that if more medical professionals work in these private groups, there will also be fewer medical professionals to teach residents. Residents aren't going to get the adequate training they deserve, and in turn, patients won't be able to get the proper diagnosis and treatments that they very much well deserve. These examples are obviously more focused on the medical field,

but this topic and these ideas could obviously be broadly applied to any field of study or work. Just in closing, I just want everyone to kind of keep in mind that the citizens who take out student loans and started working at a not-for-profit organization, don't do it for any political reasons. They don't have any say over any initiatives that their organization may or may not be involved in. Instead, they take out these jobs in a not for-profit because they want to own a home, raise a family, and have a comfortable life without the stress of student loans hanging over their heads. If you change the definition of a qualifying employer, it doesn't hurt just one single US citizen. It hurts the American dream. Thank you, everyone, for this opportunity to speak today. I really appreciate it.

MS. ABERNATHY: Thank you for your comments. Heather Jarvis?

MS. JARVIS: Good morning. Thank you for the opportunity.

MS. ABERNATHY: Three minutes, Heather.

MS. JARVIS: Thank you, and thanks for the opportunity to speak with you today. In too many areas, schools are struggling to fill vacancies. Clinics are short on doctors. Mental health services are

stretched beyond capacity. These aren't just gaps. They are threats to the health, the safety, and the future of entire communities. And public service loan forgiveness is about keeping nurses in these rural hospitals, keeping teachers in remote classrooms, and mental health providers in isolated communities. This program helps close these gaps by giving public service professionals a reason to stay. When someone with a specialized education is choosing where to live and work, the program can make the difference between settling in a rural town or moving to a city where the pay is higher. PSLF allows passionate and qualified professionals to put roots down where they are needed most, without being forced out by financial pressure. This program works. It makes rural schools more competitive in hiring. It helps community health centers attract skilled providers. It brings stability to the people and the places that form the backbone of America. The office of the Republican Attorney General of Missouri emphasized this point last April, calling PSLF a tremendous asset to achieving their goals of protecting the public from criminals, preserving state tax dollars, and improving the quality of life for Missouri citizens. And PSLF works because of Income Driven Repayment. Income Driven Repayment ensures that someone working in a modest salary public service job can afford to make their

payments without leaving the job or the town that depends on them. The program is not a giveaway. It has unprecedented and unrivaled work and repayment requirements. Diminishing the scope of PSLF and IDR risks more school vacancies, more unstaffed clinics, and more burnout among those trying to do it all. This is not about politics. It's about real people and real places, your neighbors, your schools, and your first responders. My name is Heather Jarvis. I spoke today on behalf of a coalition of more than 100 nonprofit public service organizations. We urge you to protect PSLF, strengthen it, let it continue to do what it does best, giving our communities a fighting chance to recruit and keep the public servants that rely on it every day.

MS. ABERNATHY: Thank you for your comments. Tim Powers?

MR. POWERS: Good morning and thank you for the opportunity.

MS. ABERNATHY: Three minutes, please.

MR. POWERS: Thank you so much, Tamy. Good morning and thank you for the opportunity to address the Department through this Negotiated Rulemaking process. My name is Tim Powers, and I serve as vice president of government relations and policy development at the National Association of Independent Colleges and

Universities, or NAICU. I have the privilege of speaking today on behalf of our nation's 1700 private nonprofit, or independent colleges and universities from across the nation. Institutions that have long been community anchors of access, innovation, and excellence in American higher education. Our schools serve a wide array of students, often with fewer public resources, but with a deep commitment to mission, character formation, and academic excellence. Nearly 40% of all students attending a private, nonprofit college or university at the undergraduate level receive a Pell Grant. We welcome the Department's stated focus on streamlining regulations, cutting unnecessary red tape, and improving Federal programs. And we stand ready to work together in the public interest. First, we urge the Department to prioritize clear and reliable communication around Public Service Loan Forgiveness. Graduates of our institutions serve as teachers, nurses, nonprofit leaders, and public servants across the country. Yet too many encounter confusion and administrative hurdles that undercut the program's very promise. Borrowers and the institutions that support them need stable, transparent guidance to ensure that PSLF is a tangible reality and not a moving target. Second, we strongly support simplifying the repayment program, particularly the Pay As You Earn and

Income Contingent Repayment Plans. For many students, loan repayment can be a maze of options, terms, and shifting rules. We believe that a clearer, more predictable framework is essential, one that allows borrowers to focus on their careers and communities rather than on deciphering bureaucracy. But beyond these program specific reforms, we respectfully also urge the Department to address structural challenges that burden independent institutions without advancing educational quality. Rules intended to ensure integrity must not inadvertently penalize well-governed nonprofit institutions or stifle the very innovation that has made American higher education the global gold standard. To that end, we recommend a few potential ideas. First, clarifying that nonprofit board members who are not owners under Federal financial responsibility standards. Second, correcting financial calculations that punish prudent fiscal management. Third, protecting faith-based institutions religious identities without imposing disproportionate financial liabilities. Repealing or reforming flawed financial value transparency and gainful employment regulations. Streamlining the merger and acquisition processes to perverse educational opportunity and eliminating redundant invasive disclosure requirements. Thank you for your time and for your

commitment to strengthening our nation's future through thoughtful policymaking.

MS. ABERNATHY: Thank you for your comment. Lucinda Sanchez?

MS. SANCHEZ: Hello.

MS. ABERNATHY: You have three minutes.

MS. SANCHEZ: Okay, thank you. My name is Lucinda Sanchez, and I live in Lombard, Illinois. I'm a student borrower and a member of the Project on Predatory Student Lending, Community Action Council. I believe in the power of education. I believed that if I invested my time, my money, and my dreams, this system would invest in me too. As a first-generation college student from a low-income household, I knew I had to be smart about money. So, after graduating from Quincy Senior High School, I earned as many credits from community college as I could. When it was time to transfer, a friend recommended DeVry University because she had seen multiple advertisements and heard that they were a lower-cost option, and I needed online courses to accommodate my work schedule. It seemed like a great fit. Immediately upon contacting DeVry, I was bombarded with phone calls and emails. They made me feel like they saw my potential despite my rough background, both

financially and educationally. In reality, they saw me as an easy target. As soon as I completed enrollment and began classes, everything started to fall apart. My professors seemed haphazard and not easy to reach. It was obvious that there were no standards set for students. As I neared the end of my degree program, I was informed that I wasn't eligible to take out any more Federal Student Loans. My only option to continue to have my education Federally funded would be for one of my parents to take out a Parent Plus Loan. I was infuriated that I had to pull my family into my financial choices. I felt like I'd already sunk so much into getting this degree. I couldn't turn back. Those loans burdened my parents and impacted their financial decisions as well. After graduation, reality hit as to what I just wasted my hard-earned money and time on. As I started interviewing for jobs, I realized how underprepared I was. It was clear that nobody took my degree from DeVry seriously. I felt stupid and cheated, but when the system failed me, Borrower Defense is what kept me from being stuck paying for a scam. No one deserves to be penalized and taken advantage of when attempting to better their education. Higher education institutions must do better. Our government must do better. Protections like Borrower Defense exist for a reason, and we need to make sure they

remain in place. Programs like Income Driven Repayment and PSLF are essential for borrowers like me who are just trying to stay afloat. Having access to an affordable repayment plan can help borrowers stay out of default. Instead of working to end these critical protections, the Department and Congress should be working to shore them up and make sure (20 seconds) they have the resources to carry these out effectively. For example, they should be expanding IDR to Parent Plus borrowers repaying these loans with (inaudible) not just by my parents, but by me as well. And it was that much harder with fewer repayment options. We need our federal government to look out for us, not schools and servicers. Thank you.

MS. ABERNATHY: Thank you for your comments. Victoria Jackson? Elizabeth Bell? Elizabeth Bell. We are going to take a break. We'll be back at 1045. Thank you so much. Welcome back, friends. Joining us at the table now is Jeff Andre. He is the new Deputy Assistant Secretary for Policy, Planning, and Innovation in the Office of Postsecondary Education. He comes to the administration with nearly 40 years of experience in Federal education and workforce development policy, in both the public and private sector. From his initial start as a student advocate pushing for improvements in the Higher Education Act, Jeff first worked at the

Department as a career civil servant, working his way up from entry level policy analyst to senior budget analyst responsible for student financial assistance. On Capitol Hill, he was a senior Republican staffer on the House Education and Workforce Committee, successfully reauthorizing the Higher Education Act, Workforce Investment Act, and other important legislation to assist people with disabilities. He also drafted Landmark Legislation which created the Federal government's first performance-based organization, the Department's Federal Student Aid, or FSA office. In addition to having served previously as Deputy Assistant Secretary, he has also served in other Federal executive roles, including Director of the Fund for Improvement of Postsecondary Education, Special Assistant to the Deputy Secretary of Education, and Associate Administrator for Entrepreneurial Development at the US Small Business Administration, where he managed programs that provide training and business counseling for over 2.4 million small business clients. Most recently, Jeff worked in the private sector as an outside consultant and in house roles with schools, colleges, and universities in all sectors, lenders, as well as other corporate and nonprofit clients. A first-generation American originally from New Bedford, Massachusetts, Jeff was the first in

his family to graduate from college with the help from Pell Grants, Federal loans, campus-based aid, and institutional scholarships. He holds a bachelor's degree with honors in political science from the American University in Washington, D.C., and resides in Anne Arundel County, Maryland, with his wife, Kathy, and 11-year-old son, Anthony.

MR. ANDRE: Thanks, Tamy. I look forward to everyone's testimony today.

MS. ABERNATHY: Carolina Rodriguez? Carolina Rodriguez? Carolina?

MS. RODRIGUEZ: Yes.

MS. ABERNATHY: You have three minutes.

MS. RODRIGUEZ: Thank you for the opportunity to provide testimony today. My name is Carolina Rodriguez, and I serve as the director of the Education Debt Consumer Assistance Program, or EDCAP, at the Community Service Society of New York. We are proud to be the first program of its kind in the nation, offering free, unbiased, one-on-one assistance to student loan borrowers across New York State who are navigating repayment, default forgiveness and everything in between. We've directly assisted thousands of borrowers, giving us a deep understanding of how Federal Student Loan policies

impact real people's lives. Let me be clear, proposals to eliminate Income Driven Repayment Plans like SAVE, PAYE, or ICR, or to restrict the type of employers eligible under the Public Service Loan Forgiveness program, would cause significant harm and push struggling borrowers further into financial distress. We recently conducted national research to better understand borrower repayment challenges. What we found was stark. The high cost of everyday living and immediate expenses are the top barriers to repaying student loans, not a lack of willingness or responsibility. Many borrowers are juggling multiple types of debt payday loans, credit cards, back rent and reported this scary, more immediate stress and consequences than student loans. In New York City, or Unheard Third survey, at an even deeper layer, nearly half of households with student loan debt reported experiencing housing hardship and 40% reported food insecurity. Among low-income borrowers, 60% experienced three or more economic hardships from healthcare issues to childcare barriers to reduced wages. And this is not just a low-income issue. Even moderate and high-income households with student loan debt reported multiple financial strains. These findings are a clear warning. Eliminating IDR plans will not increase repayment. It will increase default for many borrowers, including

Parent Plus Loan borrowers who consistently are left struggling. Affordable repayment plans are the only viable path to staying in good standing while covering basic needs. PSLF is equally critical. It has taken over 17 years to make the program work as intended. Restricting access to PSLF would have far-reaching consequences not just for borrowers but for the public. Critical fields like healthcare and education are already facing severe workforce shortages. Making loan forgiveness harder to access would only deepen these challenges. No American wants to be told that they must wait weeks or months to see a doctor, or that their child is sitting in an overcrowded classroom because we made it harder for public servants to afford staying in their jobs. In closing, I urge the Department to protect and strengthen, not dismantle IDR and PSLF. These are lifelines and not loopholes. And I will say it again, eliminating IDR plans will not increase repayment. It will increase default. Thank you.

MS. ABERNATHY: Thank you for your public comment. Anya Clark? Anya Clark?

MS. CLARK: Good morning, everyone. Can you hear me?

MS. ABERNATHY: Yes. You have three minutes.

MS. CLARK: Thank you so kindly. Good morning. Thank you all for allowing me the opportunity to speak today. I'm very honored to be here, to speak to something that's very important to me. My name is Anya Clark. I am a single mother from the South Side of Chicago, but I'm also a college graduate, and my pathway to get to college was not that easy. And my pathway out of college has been just as hard. When we are talking about something like Negotiated Rulemaking, it's very important to me because my path, like so many Americans, is not necessarily linear. I graduated right at the end of Covid, and of course, our loans went into forbearance. But as we move further in life, I'm very, very afraid of what's going to happen when those loans become due. Due to a lot of the instability in our economy, it's been very difficult to keep and maintain jobs that pay adequate to the amount that I paid for my student loans, and right now, the estimated cost of my student loans, when it comes time to repay, will be around \$833 a month. Now, unfortunately for me, as a single mother, I don't have that much disposable income. But that's why this conversation is so important today. My income yearly does not look the same as a one-person income as those who have more disposable income or less children. And that's why it's so important for people like me and people

across this country to have a stake in creating the rules that will govern ourselves. We know the nuances that it takes to live life in America. We know what we can and cannot do. And when we uplift voices, we can make sure that whatever policies we create are equitable. We don't have to go after folks and garnish their wages if we put them at the table in the forefront of that rulemaking to begin with. I'm not going to take up too much of your time, but I would encourage everyone to move forward with this idea of allowing those of us who are burdened with student debt to be the solution to paying it back. Thank you so much for your time.

MS. ABERNATHY: Thank you, Anya.

Michele Zampini?

MS. ZAMPINI: Good morning. My name is Michele Zampini, and I'm the senior-

MS. ABERNATHY: Michele, three minutes.

MS. ZAMPINI: Thank you. Good morning. My name is Michele Zampini. I'm the senior director of college affordability at the Institute for College Access and Success. I appreciate the opportunity to provide these comments today. We strongly urge the Department to uphold its responsibility to students and student loan borrowers, and caution against any efforts to roll back

affordable, Income Based Repayment options or to gut the Public Service Loan Forgiveness program. Under our current higher education financing system, millions of students face an affordability gap between college costs and financial aid, and the Federal Student Loan Program serves as a critical access tool. Without it, millions of students cannot afford to enroll in college at all. In turn, the Income Driven Repayment system was created more than three decades ago in response to the growing problem of many borrowers who are unable to afford their monthly payments under standard repayment plans. IDR plans adjust a borrower's monthly payment by their income and family size to enable them to stay current on their loans and avoid the devastation of default, even in times of financial hardship. Borrowers enrolled in income-based plans default at much lower rates than those in non-income-based plans, and there are currently more than 13 million Americans who are enrolled in these plans. Without access to a truly affordable Income Based Repayment option, millions more student loan borrowers will likely default on their loans. Therefore, we strongly urge this administration to work on behalf of these borrowers and to uphold its statutory responsibilities to the 44 million Americans who hold Federal Student Loan debt by ensuring these borrowers

have continued access to affordable repayment options that do not sentence them to a lifetime of debt. Thank you.

MS. ABERNATHY: Thank you for your comment. Brian Garrett? Brian Garrett? Khoa Nguyen? Forgive me if I've mispronounced that. You have three minutes. Khoa Nguyen, you have three minutes.

MR. NGUYEN: Alrighty. Okay. Hi, everyone. Thank you, members of the Negotiated Rulemaking Committee. My name is Khoa Nguyen, and I'm here to discuss PSLF, the IDR plans and what needs to be maintained and expanded. And when you hear the words American dream, what do they mean to you? Because for some, this could mean owning a home or raising a family, and for others it means starting a business or finding success in their careers. The United States of America has long been a pillar and bastion of pushing boundaries in education, societal advancement, providing every American the opportunity to work towards their goals and dreams. In our current society, as the workforce becomes increasingly specialized and technically competent and industries undergo rapid changes, education remains a steadfast option for many students, families, and young professionals to achieve economic gain. This country has always emphasized the idea of pursuing higher education

to become competitive in this existing workforce. Growing up, I was told that going to university and college would open up more opportunities for economic gain in the future. However, even in my pursuit of education and my career building, I've had to make sacrifices and choose specific programs and opportunities over others due to the high cost of education, and so far, I've only seen my debt increase. I currently have over \$150,000 in student debt from choosing to pursue a career dedicated to helping others, and this is the more cost-affordable path to obtaining a medical license. This debt hampers my ability to buy a home in the future, raise a family, and take care of my loved ones. And I think about my student debt daily and how I will manage it in mine and my family's future. Without programs such as PSLF and IDR and PAYE, really, all those programs, students and young professionals may be forced into a difficult position where they must delay or defer their goals and achieve their dreams, rather more so focusing on attempting to address student debt. Higher education should be affordable and accessible for everyone. And student debt forgiveness is a path to economic opportunity, and imposing unnecessary barriers not only harms borrowers, but also hinders the future of our economy and nation. The United States Department should protect PSLF and IDR

and work to expand them. We must ensure that future generations have the opportunity to pursue meaningful and fulfilling careers. Thank you, and I'm happy to answer any questions.

MS. ABERNATHY: Thank you for your comments. Lovisha Williams?

MS. WILLIAMS: Hi. Good morning.

MS. ABERNATHY: Hi. You have three minutes.

MS. WILLIAMS: Okay. My name is Lovisha J. Williams. I am a student borrower and a member of the Community Action Council of Project on Predatory Student Lending. Unfortunately, my story reflects the experience of many others who were misled and harmed by ITT and other predatorial institute. In 2009, fueled by the hope of a brighter future and leveraging my father's hard-earned G.I. Bill benefits earned through (inaudible) service, the US Marine (inaudible), I enrolled at ITT Technical Institute, Torrance, California, pursuing an associate in science in Criminal Justice. I subsequently continued my education there at Culver City campus, completing a Bachelor of Science in project management and business administration in 2012. Instead of this pursuit of higher education, intended to be a steppingstone to stable and fulfill careers, plunged into

a deep financial crisis. ITT Tech's deceptive practices were insidious. Despite repeat assurances that my GI Bill benefits would cover tuition, I relentlessly pressured to take out (inaudible) additional loans, both federal and private. These loans incurred in my father's name and mine to continue a crushing burden severely impacting our, our- severely impacting our credit score overall to this day. The education itself proved to be utterly worthless. The degree I received from ITT Technical Institute is not accredited nor recognized by other educational institutions or employers. Eight years of my life dedicated to pursuing higher education have been relentlessly, (inaudible) fruitfulness, a profound waste of time and resources. I was left with ten \$10,000 of debt and (inaudible) student loans I accrued necessity until enrollment of IDR plans to ensure manageable monthly payments. This personal experience underscores the urgent need for more accessibility and affordable student loan repayment programs to support borrowers. Many borrowers across the country struggle and will likely default without programs like Income Driven such as SAVE, PAYE, PSL and Borrower Defense. The Department should be working on improving programs, not shutting them down or limiting access. (20 seconds) Beyond the financial devastation emotional tolls has been amidst the

stress and anxiety and the betrayal has been overwhelming. I am grateful for assisting- having assistance and having received from PPSL and navigating the aftermath of ITT Technical Institute fraudulent, fraudulent actions. They must be held accountable for their deceptive practices. Thank you.

MS. ABERNATHY: Thank you for your comment.

MS. WILLIAMS: Thank you.

MS. ABERNATHY: Elizabeth Bell?

DR. BELL: Good morning. I'm Dr. Elizabeth Bell. Can you hear me?

MS. ABERNATHY: Three minutes.

DR. BELL: Great. And I'm a professor of higher education policy at the University of Texas at Austin's LBJ school. And it's thanks to Title IV aid, including Parent Plus Loans and subsidized loans, that my family was able to access higher education, allowing us to serve our community and strengthen the American economy. I decided to pursue a PhD a decade ago to find out what works and what doesn't work when it comes to providing effective, efficient, and fair policies that expand college access and affordability for families like that, like mine, weren't born into wealth, but were willing to work hard to achieve success. Over this

decade, I've come to realize that we agree, our college financing system is broken and is far too complex. I'm here today to advocate for streamlining administrative processes and making it clear how efforts to change student loan repayment plans and any cuts to the PSLF program, the Parent Plus program, and subsidized student loan programs would impact our economy. I know I'm extremely limited on time and thank you so much for your time today. I'll focus the content of my testimony on two main points based on my research and expertise. First, any attempt to dismantle the PSLF program is an assault on our cops, teachers, counselors, and other public servants who keep our country safe. I agree wholeheartedly with the notion that the PSLF program should be simplified, and there are ways to accomplish this using existing data that can be shared across agencies that would reduce unnecessary bureaucratic inefficiency and administrative burden in the process. I encourage the Department to investigate opportunities for automatic eligibility verification for PSLF, and this would save us valuable taxpayer money by reducing the verification burden on Department employees and save citizens time, and maybe even restore trust and faith in government, something that my research shows are desperately needed at this time. Second, the Income

Driven Repayment Plans allow citizens to pay back their loans at a pace that doesn't cripple them. If this option was not available or is cut, many citizens wouldn't be able to pay for their homes, their cars, or food for their children. In addition, without Parent Plus and subsidized student loans, many families like mine would not be able to access higher education. These risks making higher education a private commodity that only wealthy families can access. Together, taking these programs away from citizens will skyrocket default rates and plummet our economy into economic ruin. (20 seconds) More than just the economic catastrophe, though, this move would also undermine trust in government, which would not serve this administration well in the long run. Moving forward, wrapping up, I hope the Department does not move forward with plans to get rid of the IDR payment plans and PSLF program, and I look forward to engaging with you moving forward on how we can create policy that's both fair, efficient, and effective. Thank you.

MS. ABERNATHY: Thank you for your comment. Nicholas Hartlep?

DR. HARTLEP: Hi, my name is Nicholas.

MS. ABERNATHY: Three minutes, sir.

DR. HARTLEP: Okay. Hi. My name is Dr. Nicholas D. Hartlep. I hold the Robert Charles Billings

Endowed Chair in Education and chair the education studies Department at Berea College in Berea, Kentucky, where we train future K-12 teachers. At Berea College, every student receives a Tuition Promise Scholarship that covers 100% of tuition. And through our labor program, students work campus jobs to help offset other expenses. Our model allows most graduates to leave with little or no student loan debt, making Berea a national leader in affordable higher education. However, most students across the country do not have this opportunity. Student loan debt weighs heavily on borrowers, particularly those entering public service professions like teaching, where salaries are low. As a former public-school teacher and now teacher educator, I have studied and researched student loan debt. I have published peer-reviewed books and articles on the negative impact that student loan debt has on individuals in our society. I also personally benefited from the Public Student Loan Forgiveness PSLF program, having my student loans forgiven this past year under President Biden's temporary expanded PSLF, or TEPSLF program. I'm here to urge the US Department to preserve and strengthen Income Driven payment plans and the PSLF program. PSLF was signed into law by a Republican president and has bipartisan legislative support. I'm concerned by data that shows that very few

Americans enrolled in the PSLF program have had their student loans forgiven. The Department should make it easier to recertify employment annually and improve communication with borrowers to make sure they understand eligibility requirements. Vendors like MOHELA haven't made this process very easy. MOHELA often gave incorrect or misleading advice, leading borrowers to make ineligible payments. Moreover, many borrowers were unaware their loans or repayment plans didn't qualify. We must streamline and safeguard these programs, not make them harder to access. Thank you for your time and for your commitment to improving these critical programs.

MS. ABERNATHY: Thank you for your comment.

DR. HARTLEP: Thank you.

MS. ABERNATHY: Dr. Jennifer Brull?

DR. BRULL: Good morning. My name is-

MS. ABERNATHY: You have three minutes.

DR. BRULL: Okay. Good morning. My name is Dr. Jen Brull. I'm a family physician in Fort Collins, Colorado, and the current president of the American Academy of Family Physicians, representing 128,300 physicians and medical students across the country. Thank you for the opportunity to provide

testimony today. Family physicians are at the heart of our communities. We care for patients across their lifespan. Preventing chronic illness, managing complex conditions, and increasingly supporting mental health. Our work improves lives and strengthens communities, especially in rural and underserved areas. Yet, the high burden of medical education debt continues to limit who can become a physician and where they can afford to practice. Physicians are the most likely professionals to carry student loan debt, with nearly 80% burdened by debt. And while the cost of medical education is the same, whether a doctor enters a primary care or a non-primary care specialty, primary care specialists, including family physicians, typically earn far less than their peers. That gap makes programs like Public Service Loan Forgiveness critical for family physicians, not just for personal financial stability, but for sustaining access to care in rural and underserved communities. Loan forgiveness programs directly influence the choice to enter family medicine. They also offer economic benefits to communities. A rural primary care physician generates an estimated \$1.4 million in annual economic activity and supports more than 26 local jobs. Supporting debt relief for family physicians doesn't just strengthen our healthcare system, it boosts entire local economies. The

Public Service Loan Forgiveness program has been especially important for family physicians. In a recent AAFP survey, more than 75% of respondents said they were either currently or had previously been enrolled in PSLF. Many shared stories of returning to practice in their rural hometowns, choosing public service careers they love because PSLF made it possible. Without it, many would have been forced to leave the public service for the private sector, leaving critical health needs unmet. In closing, the AAFP urges the Department to advance policies that provide meaningful debt relief for physicians and medical students. Addressing medical education debt will help tackle our country's chronic disease crisis, strengthen rural health, and give patients and physicians alike the autonomy to choose the path that best serves their community. (20 seconds) Thank you again for the opportunity to testify today. The AAFP stands ready to assist the Department in advancing policies that support a strong, resilient healthcare workforce. If we can be a further assistance, please reach out to the AAFP Government Relations staff.

MS. ABERNATHY: Thank you for your comment.

DR. BRULL: Thank you.

MS. ABERNATHY: Holly Adams? Holly

Adams?

MS. ADAMS: Hello. My name-

MS. ABERNATHY: You have three minutes.

MS. ADAMS: Hello, my name is Holly Adams and thank you for the opportunity to speak today. I'm here to express my deepest concerns and strong opposition to the administration's proposed changes to the Public Student Loan Forgiveness program. These changes aren't just bureaucratic. They're deeply personal. They threaten financial stability and futures of thousands of Americans like me, who chose purpose over profit and service over salary. To date, I've made 113 qualifying payments toward the Public Student Loan Forgiveness, only seven shy of the 120 required. I've dedicated myself to serving the public and have been diligent about making monthly payments. Over the nine and a half years, I've spent countless hours on the phone with my lone survivor to ensure compliance with the rules. I was looking forward to 2025, the year my Public Student Loan Forgiveness program would be concluded. Now I feel the promise of support is at risk, impacting my livelihood and my sense of security. Public Student Loan Forgiveness is not about rewarding debt, as some critics would say. It's about ensuring that critical public

service roles remain accessible to those who can't afford to take on low-paying jobs and shoulder the crushing burden of student loans. To say that the Public Student Loan Forgiveness program is unfair because it doesn't help everyone is like saying food stamps are unfair because they don't feed the wealthy. Equity does not mean every person gets the same benefit. It means we tailor support to meet people where they are, especially when they're doing critical work and services all society relies on. Without Public Student Loan Forgiveness, entire sectors, public education, community healthcare, social work, environmental advocacy are being at risk of being gutted. Many of these roles require advanced degrees yet offer salaries that do not match the cost of that education. Loan forgiveness is one way our society helps balance that gap. I don't own a house. I don't have any children. I don't own my own car. Not because I'm irresponsible. Because I can't afford to do so with a full-time job. Public Student Loan Forgiveness allows people like me to live with dignity- do matter- do work that matters and contribute meaningfully to the communities without being crushed by debt. (20 seconds) It's not unfair. It's essential. The proposed rollbacks would break promises. It would break people. Public servants are not looking for special treatment. We're

asking the government to honor its commitment and invest in the very people that hold our society together. Please protect the Public Student Loan Forgiveness program. Please protect those who have already sacrificed. And please protect the future of public service in this country. Thank you.

MS. ABERNATHY: Thank you for your comment. Andrew Gillen?

MR. GILLEN: Hello. Can you hear me?

MS. ABERNATHY: Yes. You have three minutes.

MR. GILLEN: Great. Thank you. So, I'm Andrew Gillen, I'm an analyst with the Cato Institute. And I'd like to talk about the three sections that were highlighted in the announcement. So, for public sector loan forgiveness, the current eligibility criteria result in a lot of nonsensical results. So, for example, you could have a nurse working at a nonprofit hospital eligible for PSLF. That same nurse moves to a for-profit hospital doing the exact same job is no longer eligible. And this is, a flaw of PSLF. One of the ways you could address this flaw is by using the Bureau of Labor Statistics' standard occupational classification codes. For example, the code for nurses is 29.1141. Anybody with a job with that, with that classification code could then

be eligible. That would help address the disparity between the nurses. Alternatively, you could also look at the tax status of the organizations. For example, there's organizations called 501(c)(13). These are cemetery companies. I have nothing against cemetery companies, but I don't see a compelling reason why they should have preferential treatment when it comes to student loans compared to everyone else. And you could limit eligibility based on, on the tax status of these various groups. Regarding the IDR plans, so, so particularly for the PAYE plan, there were a couple of changes that the Obama Administration's REPAYE reforms made that I thought were good. One was increasing the years of repayment, particularly for grad students from 20 to 25 years. I think that's an appropriate change. And we should look to do the same thing for PAYE. The other thing they did was they closed the married filing separately loophole where families could strategically choose their tax filing status to minimize payments. I view that as a loophole. And REPAYE closed it, but it's still open in PAYE. A couple of things that REPAYE did not do that I think would be worth doing as well is dropping the interest subsidy and eliminating the monthly payment cap. And then finally, something that I think would also make a lot of sense is removing the partial hardship requirement. This

should just be an option; a repayment plan that folks can choose if they want. We don't need to have an income test for them. Regarding the last one, improving program- (20 seconds) for accreditation, the Department could issue regulations to encourage accreditors to increase transparency or to use their flexibility to move away from such binary decisions. And then finally on quality assurance. Section 454 of the Higher Education Act requires the Secretary of Education to establish quality assurance system. We don't have one. We should have one. And it should really focus on repayment rates where schools where students fail to repay their loans, lose eligibility to participate in the program. Thank you so much.

MS. ABERNATHY: Thank you for your comment. Jarrod? I'm sorry, that was- Jarrod Wall is next. Jarrod? Frederick Engram? Frederick Engram?

DR. ENGRAM: Good morning.

MS. ABERNATHY: You have three minutes, sir.

DR. ENGRAM: Good morning. I would like to first thank the Department, the Association for the Study of Higher Education and Scholar Strategy Network for the invitation to speak today. My name is Dr. Frederick Engram Junior, and I'm an assistant professor

of higher education at Fairleigh Dickinson University. At Fairleigh Dickinson University, I teach a course titled The History of Higher Education, among others. This makes me an expert on this subject matter, directly impacted by the decisions of this government entity and the current administration. I come before you today to speak directly to you regarding the student debt crisis, PSLF, and the anti-Black racism inherent within the system of higher education and the loan borrowing process. In his quintessential text regarding the creation of the American Higher Education Complex, Professor John R. Thielen pointed out a single fact that shapes higher education. That fact? Who higher education was intended for. Higher education at its inception and even now was intended for wealthy, white, cisgender, heterosexual males. This specific identifier excludes everyone else who does not fit its criteria. It is the same criteria that the current administration of this country and the white supremacists associated with it, are attempting to drive higher education backwards to. From the lawsuits aimed at upending former President Biden's student forgiveness plans to the overturning of Roe v Wade and affirmative action. Each of these actions aimed at destabilizing the most marginalized among us. Public college was free until the administration of former

President Ronald Reagan, who intended to determine who could attend college. His tax bills and pulling public support from higher education is what forced student borrowing to become essential for the non-wealthy. The intent was to weaken the middle and lower-middle class, read as people of color and women specifically. Public Service Loan forgiveness was supposed to provide an opportunity for college-going folks to receive relief after meeting the outlined qualifications. However, the PSLF system is not without flaws and has helped to add an additional layer of stress to already overburdened people. Black women carry a disproportionate amount of the \$1.7 trillion debt, and this is solely because of anti-Black racism. Anti-Blackness is what drove Reagan's agenda, and it is what is driving Trump's agenda. The debt should be canceled just as the PPP loans were for elected officials. But in the meantime, reimagine the PSLF process so that it is intentionally equitable and not performatively so. Consider the fact that attending college is essential to fill the professional manual and alternative modes of employment, and that, just maybe (20 seconds) people should not be forced into lifelong debt to achieve any degree. This ask is not outside the scope of possibilities. It just needs to be made a priority for people more concerned about being labeled racist than

they are about not actually being racist. Thank you for your time.

MS. ABERNATHY: Thank you for your comment. Megan Sanchez? Megan Sanchez? Megan?

MR. SANCHEZ: Yeah. Magin, yes.

MS. ABERNATHY: Oh, I'm so sorry. Excuse me. You have three minutes.

MR. SANCHEZ: Thank you. Good morning. My name is Magin Sanchez, and I'm a higher education policy analyst at UnidosUS, the nation's largest Hispanic civil rights and advocacy organization. We strongly oppose the Department's efforts to restrict nonprofit employer eligibility to Public Service Loan Forgiveness as outlined in the recent executive order. PSLF was created as a vital investment in our country's future, empowering talented graduates to serve the very foundation of our democracy through public service. This critical program not only addresses the severe nonprofit staffing shortages, but one that serves the public interest. Like many Americans, Latinos are being crushed by student loan debt, making it impossible to plan for the future. When these professionals, teachers, librarians, firefighters commit to giving back through public service careers, they're often less lucrative than in a private sector. We have both a moral obligation and

an economic incentive to honor that commitment through loan forgiveness. Assessing public service careers should be based on merit and not limited to those born with wealth. The law clearly established statutory authority for broad-based eligibility 401(c)(3) tax exempt organizations, and we reject politically motivated attempts to narrow this eligibility and break the long-standing commitment made to borrowers who have faithfully been making payments for years. Such organizations should not have to check their admissions at the door so that their employees can access PSLF. This includes missions that ban so-called illegal DEI, even though the administration has yet to define what it considers as illegal DEI. This sets a dangerous precedent that any administration can eliminate PSLF for any ideology it disagrees with. In addition to protecting PSLF, we strongly urge the Department to prioritize including time-based forgiveness as part of any Income Driven Repayment plan. A shocking 40% of Latinos student loan borrowers have already defaulted. This is not their fault, though. These students are more likely to come from low-income backgrounds, be the first in their family to graduate college, and have limited resources and guidance. A poorly designed repayment policy that leads to default would undoubtedly keep Latinos and other

underserved communities in poverty. Having a group of Americans who can fully participate in the economy through home ownership and entrepreneurship hurts us all. Lastly, to have an honest and productive rulemaking process needs to ensure that a range of representative voices are at the table. Those most directly impacted students and borrowers. We strongly urge the Department to ensure the interests of these groups, including a seat for the long-standing members of the civil rights community and additional seats for students at the negotiating table to represent students of color and other underserved communities. Failure to do so will then accurately capture the voices of all stakeholders impacted by these proposed regulations. (20 seconds) For these reasons, we strongly oppose the Department's proposed changes. Thank you.

MS. ABERNATHY: Thank you for your comments. Brian Garrett?

MR. GARRETT: Good morning. Good morning.

MS. ABERNATHY: Good morning. You have three minutes.

MR. GARRETT: Thank you. My name is Brian Garrett, and I'm here today to talk about why Public Service Loan Forgiveness, often paired with Income

Driven Repayment Plans, not only needs to be protected, but expanded. All my life, I was told that going to college would open a door to opportunity and economic freedom. But instead of finding stability, I watched my student debt grow while my financial prospects shrink in this economy. As a graduate of a small college, Medgar Evers College, CUNY, luckily, I was not as impacted by student loan debt as many of my recent graduate peers. In 2022, Medgar Evers College, 98% of students, think about that for a moment, 98% of students receive some form of tuition assistance, for without these services, most, including myself, would waive that financial burden on ourselves and ultimately our futures. Student debt makes it harder to buy a home, invest in the future, or even think seriously about starting a business, something many of us have only dreamed of. Programs like PSLF and IDR give graduates the chance to serve communities, whether in education, public health, or government, without sacrificing one's financial well-being. They acknowledge that public service matters, and that borrowers shouldn't be punished for choosing to invest in their education. We were told on student loans was an investment in ourselves and our country. But that promise has fallen flat for too many. Higher education should be affordable and accessible. Student debt forgiveness is not just a

financial issue, it's a socioeconomic issue. When we put up unnecessary barriers to forgiveness, we're holding back our country and the next generation of a future leaders. - It's more than about individual debt. It's about building a shared universal education state and implementing an infrastructure sound enough for societal progression, one where education is treated as a public good and not a private burden, one that invests in people because we believe in every student, regardless of their income. By protecting and expanding programs like PSLF and IDR, we're not just helping individual borrowers, we're affirming an American commitment to a shared opportunity and the idea that education should uplift and not entrap. We need policies that reflect our American values and prioritize the well-being of those who serve. We must provide a real pathway out of student debt, not just for today's borrowers, but for the future of our country. The Department must not only protect PSLF and IDR, but they must also expand them. If we want a society built on a shared opportunity- (20 seconds). We must invest in a universal education state, as students and public servants can no longer afford to wait. Thank you for your time.

MS. ABERNATHY: Thank you for your comment.

MR. GARRETT: Thank you.

MS. ABERNATHY: Dr. Arielle Kuperberg?
Dr. Kuperberg? You have three minutes.

DR. KUPERBERG: Hello. My name is Arielle Kuperberg, PhD. I'm an associate professor of sociology at the University of Maryland, Baltimore County. And I've been doing research on student loans for around ten years. This research has included analysis of national data sets, along with surveys and interviews of college graduates with and without loans, who my collaborators and I have followed over time for up to eight years past graduation. I've published five peer-reviewed articles and numerous additional works focused on the non-financial consequences of student debt for college graduates with loans, including family, housing, and physical and mental health. If the Department wants to streamline and improve student aid programs, my research suggests four key actions. One, the Department should reduce administrative barriers, such as simplifying the Public Student Loan Forgiveness program process. Two, they should shorten repayment periods in Income Driven Repayment Plans. Three, they should reduce or eliminate interest on loans. And finally, the Department should maintain strong borrower protections, including being able to discount spousal income and

Income Driven Repayments. Eliminating this protection would further discourage loan holders from getting married. My research has found that loans expand access to higher education, to those who don't have family money to pay for college up front, leading to large gains in lifetime income for the average borrower. However, despite increases to average income, those who graduate college with loans are less likely than college grads without loans to get married or have children. They have worse self-rated health and mental health and are more likely to delay healthcare or reduce the amount of prescribed medication they take to save money. These healthcare delays also result in more major medical problems in the long term. My research has determined that these outcomes result in large part from a strong sense of financial responsibility when it comes to paying down debt before getting married, having children, or paying for other expenses. Many borrowers have reduced disposable income from high loan payments and compounding interest, which makes them feel they will never be able to pay off their debt. These negative outcomes for those with student debt demonstrate the importance of debt relief programs. Reducing or eliminating compounding interest would allow those with loans to make meaningful progress on paying off their debt, expanding access to

Income Driven Repayment and PSLF, and reducing the time to which debt is paid off in full on these plans would allow those with loans to move forward with family formation and would improve health and mental health. Finally, (30 seconds) I would add that the uncertainty and constantly changing programs and policies related to student loans are worsening the problem. Borrowers struggle to plan long term, especially when it comes to decisions such as starting a family in the face of unclear or shifting policies. Thank you for your time.

MS. ABERNATHY: Thank you for your comment. Payton Cole?

MS. COLE: Hello.

MS. ABERNATHY: Hi. You have three minutes.

MS. COLE: Thank you. Good morning. My name is Payton Cole, and I am a deputy prosecutor from Indiana, who is approximately four and a half years of payments into the ten years necessary to receive Public Student Loan Forgiveness. I have been working at the prosecutor's office for eight and a half years, and as a deputy prosecutor for over five years. I specialize in special victims' crimes, meaning sex crimes, domestic violence crimes, and crimes against children. I'm in a supervisory position in our Special Victims Division. I'm

also a wife and a mom, and I work extremely hard to balance providing for my family, while also giving everything I can to victims of violence in our community. It's no secret that the state and county government simply cannot pay their attorneys the same amount that private practice can. Because of that, it is imperative that these government entities be able to provide other benefits that allow for talented attorneys to choose to spend their careers in the public sector. PSLF is the benefit that I hear talked about more than any other, because typically our law school debt is the financial burden that is holding us back. To be clear, the attorneys that I work with are very passionate about the work that we do for the people of our community, and they want to be doing that work. But the simple fact is, if they're spending a third of their monthly salary on student loans, it just isn't maintainable. The only way to properly serve our communities, meaning getting dangerous individuals off of our streets and holding them accountable for the harm that they do is to make sure that our deputy prosecutors that we are hiring, are passionate about their work, are able to stay in that position over time to gain the necessary knowledge and skill to be effective, and to do it without the constant stress that our families are going to go without, so that

we can do the job that we feel is our calling. I grew up with parents who have always worked very hard to provide for me and my three siblings. They did everything they could to provide for us financially, but there's no way they could pay for all four of us to pursue higher education, especially something as expensive as law school. So, when I made the choice to go to law school, I did it with the specific intention to become a deputy prosecutor. I met with financial advisers to talk about my options, and the only option I had was to take on extreme amounts of debt. But I was told about the PSLF program and the Income Driven Repayment Plans. If it hadn't been for the promise of PSLF and the IDR plans, I would not have gone to law school. When I made the decision, I made it knowing that the government was making me a promise. If I worked for them for the betterment of our community, they would make sure that I was okay financially and I believed that promise. Now, as the SAVE Plan was stripped away from us, my monthly payments went from \$113 to being estimated to be over \$500 per month. If PSLF and Income Driven Repayment Plans cease being an option, I will be paying over \$1,000 a month for the next 25 years to pay off my loans. I don't have an extra \$1,000 a month at my disposal, so that means that I'll have to decide if I take that money away

from my son's education or plans to buy a home in the next few years, or my retirement. (20 seconds) Likely, all those things will be affected. What I'm asking is simple. Keep the promise that you made to me, and others like me. I give you my time, my experience, my heart, and my very best every single day that I walk into my office. I can't imagine doing anything else, and I need these programs to be able to continue this work. Thank you for your time.

MS. ABERNATHY: Thank you for your comment.

MS. ABERNATHY: Stephanie Aguilar-Smith? Stephanie Aguilar-Smith? Hi. You have three minutes.

MS. AGUILAR-SMITH: Perfect. Thank you. I'm a higher education scholar whose research broadly focuses on federal policies' impact on minority serving institutions, particularly Hispanic serving institutions, or HSIs and their students, most of whom identify as Latino. And some of my work examines administrative burdens and the racialized consequences. These burdens include complex rules and processes that limit access to and the use of public benefits like federal student financial assistance programs. And one key burden is learning costs, and the time and effort

required to understand a policy, its benefits, eligibility, and how to apply. Research, including a 2018 GAO report, shows that the Public Service Loan Forgiveness, or PSLF program, is riddled with learning costs due to its confusing criteria, and thus many eligible beneficiaries miss out on this critical debt relief. But while deregulation of PSLF and related programs may be warranted, changes could also bring serious unintended consequences. Borrowers and program implementers must relearn new regulations, likely causing confusion and missteps, and students may also make different college and career decisions in response, changes that are tricky to predict, right? For instance, modifying PSLF could deter people from public or not-for-profit work. I'm also unclear about the direction of possible changes amid the current political pressures. The administration's March 7th executive order alleges that PSLF misuses taxpayer dollars and seeks to cancel these benefits to borrowers of activist organizations. And so, compliance here will add more regulatory hoops to an already encumbered process. Rather than streamlining access, it would restrict it, harming those who pursue generally lower paying public and not-for-profit careers essential to our democracy. Moreover, barriers to these programs don't equally affect all borrowers. Wealth and

student debt are unequally distributed, and students of color, particularly black students, carry more debt, which limits economic mobility and opportunities like homeownership. Latino students are also disproportionately impacted. Research shows they're often driven by a desire to give back to their communities, and thus often gravitate towards public and nonprofit sector work. And they also tend to be averse, limiting their participation in higher education despite these programs and HSI's generally affordable price points. Ultimately, additional hurdles to debt relief, including ones inadvertently resulting from these deregulatory efforts, may counterproductively suppress- (20 seconds) (inaudible) to college and debt relief for many Americans. To close, I strongly urge including diverse voices in this rulemaking process, especially Black, Indigenous, and Latino borrowers and representatives from HSIs and MSIs. Their perspectives are essential to improving these programs. Thank you.

MS. ABERNATHY: Thank you for your comment.

MS. AGUILAR-SMITH: Thank you.

MS. ABERNATHY: Zera Kwende?

MS. KWENDE: Yes. Can you hear me?

MS. ABERNATHY: Yes. You have three

minutes.

MS. KWENDE: Sure. Good afternoon and thank you for organizing this. I'm Zera. I'm a federal worker and a beneficiary of the Public Loan Service Forgiveness. I've been doing further work for about maybe nine and a half years already, and I was due for forgiveness, or I am due for forgiveness in August. But like many others, we are stuck in the SAVE forbearance, forbearance bucket where we don't know what it is. And I'm just coming on here to sort of either ask you to consider the time, which we have no control over being stuck in that plan or in that forbearance to count toward forgiveness as this is important and this is something we've been working towards for over almost a decade, or at least have the program for the buyback, which was an excellent option to be more practical because at this time that is on paper what is supposed to be. But based on our efforts on what the research shows, the buyback is something which is not working the way it's intended to work. I would like for that program to be investigated and to see how more efficient it can be to get most of us out of limbo. And given our work in the public serviceto get this goal that we've been striving to do, because this affects other decisions in our lives in terms of not knowing if this thing is going to be over with this year

or next year. And there's a lot of other things financially which families deal with, education and planning for the future financially. This is a hold on us. I would plead for the buyback program specifically to be more efficient, and either stick with the 45-day or give more options that we have. Just being stuck in limbo is the most frustrating thing for us as borrowers or for me, particularly as a borrower. Either the best scenario is having our time and forbearance count towards our forgiveness, or at least get the buyback more effective so we get results and contracts on time to get this (20 seconds) (inaudible) and just looking forward to seeing what, what we do hopefully soon. But thank you for the opportunity. That's all I got.

MS. ABERNATHY: Thank you.

MS. KWENDE: Thank you.

MS. ABERNATHY: Caryn Jeffries?

MS. JEFFRIES: Hello.

MS. ABERNATHY: Hi, Caryn. You have three minutes.

MS. JEFFRIES: Yes. Thank you for your time, everybody. My name is Caryn Jeffries, and I am currently more than halfway through my PSLF and IDR plans. I am a born and grown American. I went through the college experience. I am almost finished. Literally next

weekend, graduating with my second master's degree. And the way that the debt has shaped the economic experience, I am unable to buy a house. I am so highly educated and doing public service has been an opportunity to interact with the community in unique ways, but also acknowledge until this loan option is taken off our backs, that I can't have my American dream of buying a home. My family, recently welcomed in a special needs child into our family and with that, my job options have been limited and moving forward, the main thing I look for, it doesn't even matter what the job is, is that it's a PSLF qualifier. This feature is so important to working hard American families. Breaking this, I fear, and eliminating these programs would break the agreements that have been made for years to so many genuinely hard-working folks and would be truly devastating to both the economy and the middle class who are trying to move up through educational opportunities. It's heartbreaking that we can be so close to making this work and being able to buy a house and it all be stripped away. My consumer debt is very low. My consumer debt shows I can buy a house. But the way that it looks at for home purchasing and student loans, I cannot. I am hoping and praying that I can be an actual adult making these big steps. But if these programs are eliminated, what's the point? Instead of

using my actual graduate degree, I might as well be working at McDonald's. So, there are so many hard-working families who are using opportunities for PSLF and IDR and removing it would literally strip us of every opportunity to change the way the debt is viewed, no longer be able to pursue home ownership or any other type of consumerism. And these changes are inducing a lot of fear. (20 seconds) Thank you, everybody, for our time. This is a big problem if this goes away, and people have been working hard for a long time to make it right from their loans and take that responsibility. But if the agreements are taken away, then no one's responsible. Thank you.

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

DR. COLLIER: Are we good?

MS. ABERNATHY: Yes. You have three minutes.

DR. COLLIER: Very good. Greetings. My name is Dr. Daniel Anthony Collier. I'm an assistant professor of higher and adult education at the University of Memphis, and nationally recognized expert on Income Driven Repayment and Public Service Loan Forgiveness programs. Millions of working and middle-class Americans pursue higher education and advance their socioeconomic

standing, contribute to a more educated workforce and society, but also incur debt that cannot be repaid under traditional mortgage-like repayments. Income Driven Repayment Plans provide critical relief adjusting payments based on income and family size. These plans are a lifeline for borrowers with significant debts and moderate incomes, including graduate students, women, and persons of color, two groups who are disproportionately affected by systemic wage and employment inequities. However, IDR remains problematic. Borrowers often face negative amortization causing balances to grow, which increases financial burden and drives psychological distress, even suicidal ideation, as borrowers feel trapped. Moreover, individuals cannot control wider economic shocks such as those we are currently experiencing. Although the prices of goods might be on the rise due to inflation and/or trade-related scarcity, IDR policies are not responsive to those shocks, only income. In certain and uncertain economic times, current policies force borrowers to choose between loan repayment and basic needs, worsening hardship for families on the financial edge. This concern drove the Trump Administration's decision to pause student loan repayment during Covid and several extensions beyond. The lack of clear communication from loan servicers leaves borrowers

confused and dependent on online communities. Scaling back tools like the IDR Visual Tracker has further eroded trust and increased uncertainty. Public Service Loan Forgiveness has faced administrative challenge, and low approval rates. Restricting who might be eligible right now would upend the lives of millions of borrowers and students planning on this benefit. Any redesign or future policy must consider factors associated with well-being. It's not merely about balancing financial inputs and outputs. This issue is- deeply affects broader factors like family planning, workplace productivity, ultimately, imposing significant financial and non-financial costs on society. Borrowers suggest that addressing negative amortization and offering incremental forgiveness could help reduce their distress. Current policy grants forgiveness only after decades of repayment. Implementing this approach would reduce loan balances over time while maintaining the same degree of forgiveness, easing both financial and emotional burdens. Another valuable pathway forward is to treat borrowers IDRs as if they were paying taxes. Remove loan balances from credit reports and structure repayments as a percentage of income over a set amount of years, like Milton Friedman's original proposal for student loans. Such a policy would bolster the ability or borrowers' abilities to buy durable goods, and

likely help ease financial and mental distress, as the balance is truly abstract, translating into lower financial and non-financial costs more widely, as I previously pointed out. (20 seconds) In conclusion, IDR and Public Service Loan Forgiveness offer pathways to manage and alleviate student loan debt. Systemic reforms are necessary to address shortcomings beyond those we have already imagined. Thank you.

MS. ABERNATHY: Thank you for your comments. Rhea DeBussy? Or Rhea DeBussy?

DR. DEBUSSY: Yeah, Rhea DeBussy.

MS. ABERNATHY: Rhea, you have three minutes. Sorry about that.

DR. DEBUSSY: No problem. So, hi there. My name is Dr. Rhea DeBussy, and I'm the director of external affairs at Equitas Health, which is a federally qualified health center look alike. And each year, we serve tens of thousands of patients across Ohio. We appreciate the opportunity to provide feedback related to the Department's management of Income Driven Repayment Plans and the Public Service Loan Forgiveness Program. As the largest LGBTQ+ serving healthcare organization in Ohio, we'd like to emphasize the importance of IDR plans for LGBTQ+ borrowers, given that many of our patients may be impacted. Roughly 2.9 million LGBTQ adults currently

hold more than \$93 billion in Federal Student Loans, and LGBTQ+ adults are statistically more likely to have Federal Student Loan debt. Additionally, it's important to note that LGBTQ+ people report higher poverty rates compared to their peers. Further, LGBTQ+ People of Color, queer women, transgender people, and LGBTQ adults with children are even more likely to be- to report living at or below the poverty level. As such, access to IDR plans is of serious importance to this community, and this is underscored by the fact that many LGBTQ+ adults also experience workplace discrimination and harassment, which further impacts their earning potential. Assuming the administration moves forward with the IDR plan options recommended in Project 2025, borrowers could expect an average payment cost to double. This would have a detrimental impact on borrowers living in poverty and working families more generally, and we strongly encourage the Department to avoid making such detrimental changes. Regarding the importance of the PSLF program, the National Council of Nonprofits recommends that this program is an essential policy solution for the public workforce shortage. As a community health center, we'd also like to emphasize the importance of the PSLF program to the health center workforce as, as noted by the National Association of Community Health Centers,

workforce shortages are largely driven by burnout and salary gaps in the nonprofit healthcare workforce. The PSLF program is an important recruitment tool to attract qualified applicants into a career in nonprofit healthcare, and as community health centers provide integrated primary care to more than 32 million patients across 16,000 delivery sites nationwide, protecting this program helps to advance the administration's goal to make America healthy again. To help address this issue, we strongly encourage the Department to ensure continued application of the PSLF program as strongly authorized by Congress and with no new restrictions. With this in mind, we recommend the following policy solutions. One, continue to offer the existing portfolio of Income Driven Repayment Plans to provide a variety of repayment options for borrowers. Two, implement a revised definition of discretionary income that is defined at 300% of the Federal poverty level, i.e., \$46,950 for a household of one to help ease the financial burden on lower income borrowers. And three, continue the Public Service Loan Forgiveness Program as authorized by Congress and with no new restrictions to borrowers. We greatly appreciate the opportunity to provide public feedback to the Department, and we're available to answer any questions that you may have at this time. Thank you so much.

MS. ABERNATHY: Thank you for your comment.

DR. DEBUSSY: Thank you.

MS. ABERNATHY: R. Emmett Murphy?

MR. MURPHY: Hello. Can you hear me?

MS. ABERNATHY: Yes. You have three minutes.

MR. MURPHY: Thank you. Good morning. My name is Emmett Murphy. I speak here today on behalf of PSLF Defense. PSLF Defense is an organization of nearly 2,000 public servants. We include doctors and lawyers, teachers and nurses, professors, government personnel and nonprofit workers. All of us and thousands more across the country made a covenant with the Department when we took our student loans that after ten years of serving the American people, our student loans would be discharged. We are holding up our end of the deal, and we expect the Department to do the same. The promise of PSLF shapes the entire lives of those who pursue it. We plan our careers around it. We turn down more lucrative jobs because of it. Our abilities to have children or to own a home depend on it. Now, PSLF is for the moment, enshrined in statute. However, the regulatory changes the Department makes can easily rob us of the loan discharge we've been working towards. Our anxiety over PSLF is

based in part on harm we have already suffered due to unprocessed applications and mistakes by loan servicers. For these reasons, we implore the Department to provide for the following. First, ensure that any changes to the definition of qualifying employer do not apply to current borrowers if their employer previously qualified. Second, ensure that there exists for current borrowers at least one IDR plan that results in monthly payments at least as affordable as under current plans. Third, give borrowers credit for all months during which they have performed qualifying employment, including those months in which the Department or a loan servicer could not or would not accept a payment. And fourth, ensure that any borrower who applies for PSLF after making 120 qualifying payments receives prompt discharge of their loans, regardless of who their employer is at the time they apply. While there are many more considerations, we would like the Department to account for, such as how PSLF eligibility should be expanded to combat the shortages of doctors, teachers, prosecutors, and public defenders, I am using my three minutes here to speak for the professionals who have already been serving the public in their careers. No matter what regulatory changes you make, do not pull the rug out from under us. Fulfill your end of the deal and do not punish good deeds. We are public servants. We are

not indentured servants. Thank you.

MS. ABERNATHY: Thank you for your comments. Diana Marginean? I'm so sorry.

MS. MARGINEAN: Yes. Can you see me?

MS. ABERNATHY: Yes. Can you mute?

MS. MARGINEAN: Yes.

MS. ABERNATHY: Can you test one more time for me?

MS. MARGINEAN: Yes. Hello.

MS. ABERNATHY: Yes. You have three minutes.

MS. MARGINEAN: Okay. Thank you so much. I appreciate the time to speak here. My name is Diana Marginean, and I work as an assistant director for research at the Five Colleges Consortium in Massachusetts. Prior to that, I taught for 14 years in higher education. Today, I want to share a little bit about my background and how instrumental PSLF has been for me. I am a product of brain drain. I left Romania after the end of the dictatorship in 1989. My parents were farmers. My father was a foreman who was never promoted because he refused to be a member of the Communist Party. God made it possible for a poor kid like me to move to the US, study, become a citizen, and eventually continue to work here. Access to student loans

was fundamental for me and helped me finish my dissertation. After graduation from my PhD program, I could have worked in a lucrative position in a private sector. I only continued to teach because of PSLF. To date, I taught more than 2,000 students, and yet my starting salary as a full college professor was \$55,000 and the highest, I earned was \$73,000. Without PSLF, I simply would not have been able to teach. The math just doesn't compute. I understood PSLF as a law that guarantees that the Federal Government will support public servants like myself as they deliver public service value that could never be earned in any other way. And I trusted the government to keep its side of the deal, while I kept mine for the past nine years as a PSLF enrollee. The past few months have been extremely stressful and anxiety-producing to the point that I've lost sleep, and honestly, it's affected my productivity. I watched the constantly shifting opinions around PSLF and it scares me profoundly. With a reduced access to PSLF and without IDR options, I fear that I will be profoundly in debt and honestly worse off than my grandparents. So today, I beseech the government to consider the following simple recommendations that are based on my personal experience. First, the Department should keep its promise. Please keep people enrolled in

their current IDR programs and PSLF as was designed by Congress and respect the rules of the original contracts that we signed. Second, work on improving the implementation of PSLF. Make the application repayment process more transparent. Work with the IRS to certify taxes and qualifying employment on the back end. Hire staff so they can process backlogs and move borrowers through the system. (20 seconds) Third, please scale up the buyback program so that we can earn back the months held in the SAVE litigation. Fourth, let research data lead the way to change. Run a cost-benefit analysis on the return of investment for PSLF. Fifth, and finally, a cautionary tale. Please beware of the brain drain from public sector work toward the private sector. This is a real threat, and I believe it's going to consequently change the landscape of the education and public sector work. Thank you for listening to me.

MS. ABERNATHY: Thank you. Alexandra Farrell? Alexandra Farrell? Excuse me.

MS. FARRELL: Can you hear me?

MS. ABERNATHY: Yes. You have three minutes.

MS. FARRELL: Thank you for the opportunity to comment today. My name is Alexandra Farrell and I'm a lawyer working at an environmental

nonprofit. I have been pursuing PSLF since I graduated law school in 2019, and I have been trying to get out of the SAVE forbearance since last summer. I'd like to speak today about issues affecting PSLF, including the definition of qualifying employer, the treatment of spousal income for married borrowers, and issues with Income Driven Repayment Plans. First, I ask that as you consider making changes to PSLF and underlying regulations, you bear in mind the millions of current borrowers who have made significant life decisions in reliance on that program. I would not have gone to law school without PSLF. I always knew that I wanted to work in public service, even though those jobs generally pay less. I also knew that law school would be expensive, even with the generous scholarship I ended up receiving. I felt comfortable taking on student loans and planning to work in public service only because of the guarantee of making income-contingent payments and only for ten years. The definition of qualifying employer is one aspect of PSLF upon which borrowers like me have relied. I fill out a verification form every year to ensure that I have qualifying employment. For almost six years now I have, first as a federal law clerk, now as an employee of a 501C3 nonprofit. But to read and listen to official executive statements about withholding PSLF relief from

employees of organizations deemed "not good" raises concerns about singling out individuals for disfavored treatment when their expression does not align with administrative priorities. I urge the Department to do better, ensuring respect for settled law and constitutional principles, as well as the settled expectations of current borrowers. With respect to spousal income, the Department recently set off shockwaves by suggesting that it would begin to account for spousal income in determining the monthly payment for married borrowers, regardless of tax filing status. I understand that the Department later changed its position, but I bring this up to emphasize how important accurate information is when the Department's decisions may affect the payments of millions of borrowers. Also, the timing of these statements was particularly unfortunate. The Department did not submit what it terms a corrected declaration until the Federal tax filing deadline, when many borrowers had already decided how to file their 2024 taxes. I was one of them. My husband and I file our taxes as married filing separately because it is the only way to make my monthly student loan payment manageable. I am solely responsible for making that payment. My husband is a public-school teacher in North Carolina, so his income isn't enough to cover our shared

bills with my student loan payment on top. I ask that the Department continue to allow married borrowers to exclude spousal income when they file taxes separately. I'd like to conclude with some thoughts about IDR plans generally. I've spent almost a year unsuccessfully trying to switch IDR plans and resume making monthly student loan payments. I am unable to reap the sole benefit (20 seconds) from filing separately tax status, while I'm prevented from making PSLF qualifying payments during the SAVE forbearance. If the Department creates incentives or disincentives for certain IDR plans, it should expect to receive many IDR applications and facilitate their processing in a reasonable time with adequate staffing, funding, and direction to servicers. If it decides to simplify the qualifications for IDR plans, it must ensure that current borrowers do not fall through the cracks. Every borrower currently eligible should remain eligible under any new proposal. Thank you.

MS. ABERNATHY: Thank you for your comments. Jarrod Wall? Jarrod Wall?

MR. WALL: Yes. Hi. Good morning.

MS. ABERNATHY: Three minutes, sir.

MR. WALL: Thank you. First, I want to thank you for the opportunity to speak in this public hearing. My name is Jarrod Wall. I'm a PhD student at

Tulane University in New Orleans, and I'm also a student loan recipient with debt. While I just want to speak for all borrowers, I want to particularly speak for formerly incarcerated individuals who are borrowers. We talk about the wealth gap or disparities. I literally came out of prison and my only wealth was a trash bag on my back. Many of us had debt before entering prison, and many of us wanting to increase our life opportunities just like anyone else accrued student debt after we were out. When I was in school, I attempted to borrow responsibly. Some of it was for tuition and some for daily living. You must understand, when I was first out, I was living on my mother's couch. But I borrowed on a certain set of assumptions that are being challenged now. I borrowed on the assumptions that I would be able to pay as I earn, that I'd be able to pay according to the level of my earnings, and that I would be able to receive loan forgiveness after serving ten years at a non-for-profit that aligned with my values, my ethics, and my beliefs. But now all these assumptions, the facts that I signed the dotted line on are, are at stake or, or, you know, being challenged, might be revoked. Now, with the- if these are revoked and they are challenged, then I'm looking at, it'll be more likely that I'll have to pay longer on my student loans and a greater amount. I

already owe 40- over \$42,000, of which 17% is interest. Unfortunately, those of us who are formerly incarcerated are not playing on the same field, you know, on the same playing field as others, the general population. We are like many students of color, race, disparities in employment and earnings. Now, with the student loan debt myself, I must wonder will I or when will I be able to afford a car again? Will homeownership ever be an option for me? Will I even be able to afford to have children? In closing, I believe if successful, these attacks on Pay As You Earn on Income Contingent Repayment Plans, Public Service Loan Forgiveness will undermine our long-held American narratives of class mobility, of hard work paying off, and of education being the great equalizer of future opportunities. Thank you.

MS. ABERNATHY: Thank you for your comment. Currently, this concludes our morning session. We will break for lunch. We'll see you back at 1:00.