

DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION
NEGOTIATED RULEMAKING PUBLIC HEARING
SESSION 1, DAY 2, AFTERNOON
MAY 1, 2025

On the 1st day of May 2025, the following meeting was held virtually, from 1:00 p.m. to 4:00 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: Welcome back. We hope you had a nice break and lunch. For those who have just joined us and are providing public comment today, you may turn your camera on 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, and the public may have difficulty hearing you otherwise. When you are speaking, you may not initially hear yourself, but after a few seconds, you will hear yourself on delay. Joining us on screen this afternoon from our Office of General Counsel is Jacob Lallo. And Mr. Bergeron, our deputy Undersecretary and Acting Undersecretary, is back at the table with us today. Without further delay, I'd like to ask Amanda Prasuhn to get ready to provide comments. Please let me know when you're ready and I'll start the clock. Amanda?

MS. PRASUHN: Hi. I just got in the room. I'm ready when you are.

MS. ABERNATHY: Three minutes, please. Thank you.

MS. PRASUHN: Thanks. Hi. Thank you for having me. My name is Amanda Prasuhn, and I am the director of public interest financial support at the University of California Berkeley School of Law. But I'm

here today. In my individual capacity, I manage Berkeley Law's loan repayment assistance program for law graduates working in public service jobs. And in this role, I work with hundreds of students and lawyers using Income Driven Repayment and pursuing Public Service Loan Forgiveness. Helping borrowers navigate their Federal Student Loan repayment system has shown me two things: that borrowers face tremendous hurdles accessing these programs, and that these programs are vital for keeping payments affordable and ensuring we have dedicated public servants in our workforce. Maintaining affordable IDR options and broadening access to PSLF are of the utmost importance. Without these programs, our economy would be in a tailspin. Millions of borrowers would go into default, while millions of others would be forced to leave lower-paying public interest and public service careers like teaching legal aid and firefighting to work for corporate interests. I'm asking the Department to preserve and expand IDR and PSLF, and I have three suggestions today. First, to decline to implement President Trump's illegal executive order asking the Department to limit PSLF access for certain public interest employees. We know the Higher Education Act defines a public service job as one in government or at a 501C3 nonprofit, and there's no room for the Department to carve out exceptions like the

president is attempting to do. It's clear the president's emphasis on illegal activities is targeted not based in fact, and not subject to the Department's or the negotiators' discretion. Second, I'm asking the Department to preserve an IDR plan alternative to Income Based Repayment, which is unaffordable for older borrowers from before 2014. If SAVE and then subsequently PAYE and ICR are overturned, the Department should propose a new, more affordable repayment plan that's in alignment with the Higher Education Act. These plans should provide an affordable path to forgiveness within a reasonable timeframe for borrowers who have high loan debts and low incomes, not saddle them with loan debt until their retirement age. And then third, I'm asking the Department to continue to work toward making PSLF easier to access for a broad swath of public interest workers. Innovations like the PSLF help Tool and the PSLF tracker on Studentaid.gov help borrowers understand what they need to do to qualify for PSLF and track their forgiveness. More effort should be made to make this process as easy as possible, like moving forward with automatically pulling employment and income records. I urge you to not only protect PSLF and IDR as they are now, but to continue to expand access to these programs as was done in previous Negotiated Rulemaking sessions.

With the cost of college only rising (20 seconds) programs ensure that our students and workforce can make their loan payments. Thank you.

MS. ABERNATHY: Thank you for your comments. Bob Carey? Please let me know when you're ready. I'll start the clock.

MR. CAREY: I'm ready.

MS. ABERNATHY: You have three minutes.

MR. CAREY: Thank you very much. I'm sorry that I'm doing this from on the street, but I'm going into the dentist right after this, and, well, anything to delay going to the dentist, , even testifying before a Negotiated Rulemaking committee. But let me say (inaudible) first, we believe- National Defense Committee is a veteran-serving organization that focuses on constitutional and legal rights of veterans. Our concern is that forgiveness of debts for anything other than fraud on the part of the educator or some significant problem by the Department in issuing the loan is fundamentally wrong. No one was forced to sign these loans. They knew what they were getting into. This is the same as forgiving someone's car loan. And frankly, you know, a lot of us in the military, a lot of us veterans, feel like we are gomers for signing on for six more years

to get GI Bill, when in fact, we could have simply gone and gotten ourselves a big loan and, and then gotten it forgiven. It's fundamentally unfair, especially to those that serve their nation in order to be able to get the GI Bill. Second, on three of the regulations, 90/10, gainful employment, and financial transparency, we strongly recommend- we- one of the things that you asked for is how to make the regulatory process more streamlined. All three of these regulations are unnecessary, are, are contrary to the ability of especially veterans and military personnel to be able to choose their education of choice and are unfairly targeted only against nontraditional education. One of the things that we have a great difficulty figuring out is while I'm on active duty, America trusts its sons and daughters lives to me. But once I become a veteran, they no longer trust me to make any of my own decisions. And that is fundamentally unfair. I know what I'm getting into when I go to a non-traditional or an online-only school. I'm currently a doctoral student in an online-only school, and I'm pleased with that. And for the Department to try to figure out where I can and cannot go to school with my earned educational benefits is fundamentally wrong. Last thing is, the Department has consistently failed to have a diverse participation in its Negotiated Rulemaking

committees for too many times in a row. Over the last 4 or 5 years, the Department has consistently chosen as its veterans and military representative, either Mr. Nassirian (20 seconds) from Veterans Education Success or another member of Veterans Education Success. And this is contrary to the type of diversity that a Negotiated Rulemaking committee needs to have. Thank you very much.

MS. ABERNATHY: Thank you for your comments. Abby Shafroth? Excuse me again if I have mispronounced your name. Abby Shafroth?

MS. SHAFROTH: Yes. Shafroth. That's correct.

MS. ABERNATHY: Oh. All right. Three minutes.

MS. SHAFROTH: Thank you. And good afternoon. My name is Abby Shafroth, and I'm the director of the Student Loan Borrower Assistance Project at the National Consumer Law Center. Our project provides analysis and public education on the student loan program and support to legal aid attorneys across the country who work with low-income people on navigating their student loans. We also participate as a member on the 2021 IDR Rule Making Committee. I have two recommendations as the Department considers changing the rules on IDR yet again this year. First, the Department should reconsider its

timing. Student loan borrowers have been through unprecedented change and disruption over the past year as IDR plans have been removed, the terms of remaining plans changed, applications abruptly pulled down, and roughly a million borrowers been left in a backlog waiting for their IDR applications to be processed. We are hearing from borrowers across the country that they are incredibly confused and stressed about navigating these changes, affording their bills, and avoiding default. And more changes on the way. A House Committee advanced legislation just this week that would dramatically change repayment options next year and eliminate the Pay as You earn and ICR plans entirely. Changing these rules on borrowers now while Congress is pursuing changes that would change things yet again next year, threatens to create unnecessary disruption and stress for borrowers. Instead, the Department should wait and see if Congress enacts changes to repayment options and only then proceed from there. Second, if the Department does move forward with the rulemaking on repayment, it should focus on two things. First, keeping its promise to borrowers as reflected in their loan contracts to allow borrowers to cap payments at no more than 10% of disposable income, and to have any remaining balance canceled after no more than 20 to 25 years. That is in borrowers' contracts and

the government should honor its commitments. Two, providing access to affordable payments and addressing the default crisis. Prior to the payment pause, roughly 1 million borrowers defaulted every year, mostly from low-income and working-class families and with devastating consequences for their finances, their families, and the broader economy. The SAVE Plan was designed to improve repayment and reduce defaults, but with the SAVE Plan currently blocked and the cost of living much higher than it was in 2019, there are now some 4 million borrowers behind on their loans and on track to default this year. The Department can stem the default tide and help low-income people successfully manage their loans by restoring and implementing key reforms included in the SAVE regulations, including automatic enrollment (30 seconds) and IDR for borrowers who fall behind on payments, automatic recertification using data matching, affordable payments for all, and \$0 payments for borrowers whose low incomes leave them vulnerable to food insecurity, so borrowers and their kids don't go hungry because of student loans. Thank you.

MS. ABERNATHY: Thank you for your comment. Toma Bartlett? Please let me know when you're ready. I'll start the clock.

MR. BARTLETT: Yeah. I'm ready.

MS. ABERNATHY: Okay. Three minutes.

MR. BARTLETT: Sure. Absolutely. Good afternoon. My name is Toma Bartlett, and I wanted to start off by saying how honored I am to be recognized as an advocate for our veterans. I am a 12-year Coast Guard veteran, and I'm also one of the tens of thousands of veterans or dependents that were grossly misled by for-profit universities. The University of Phoenix used misleading and false information to recruit, retain, and absorb as much financial gain for me as possible. In addition to using my entire GI Bill, I was also prompted to take out additional financing to help support my family while I was attending school. In the end, I spent more than \$72,000 and held a degree that was rendered useless in the job market. Additionally, I was promised two things: guaranteed job placement and a mid-level management position. The University of Phoenix, along with numerous other for-profits, had and continues to have a poor reputation as a quality leader in education. Of all the classes I attended, there was only one class that challenged me, and I was forced to open a book. For all others, mere online posts and meaningless team-written papers were adequate to receive a 3.8 GPA. Often, the team participation meant that only one or two students in a group would actually participate, while the

others lacked any meaningful feedback or contributions. When these issues were brought forward to the facilitator, they were, they were dismissive and failed to hold others accountable. I graduated with a bachelor's degree in healthcare administration, but I didn't receive any benefit from my degree. It has taken me more than 12 years since receiving my degree to finally be relieved of my student debt due to the Borrower Defense and Sweet settlement. My wife and I, Dr. Nicole Bartlett, have been successful in building our own private mental health practices, of which we are able to serve a large veteran population. Many of these veterans suffer from depression, and a common denominator leading to depression is financial uncertainty. Just imagine being an energetic and driven member of the military wanting to receive a higher education because you want to better yourself and provide for your family, and in the end, dig yourself deeper in debt, have a meaningless degree, and have to settle for a mediocre job just to get by. How can that not send a vendor into a downward spiral of depression? Although there's no exact number of veterans who commit suicide solely based on financial hardships, I know firsthand that it is real. It is not well addressed and just shouldn't happen. Veterans deserve affordable repayment options- (20 seconds) -when they repay their

student loans, especially when their degree does not lead to jobs and salaries that allow them to repay those loans. They also deserve better oversight and accountability. It is my fear that as the Department, Department of Veterans Affairs continue to be dismantled, that all the work that I've done with the support of the Veterans Ed Success and many others will fade away.

MS. ABERNATHY: Time.

MR. BARTLETT: Yep. I just want to thank you for taking the time.

MS. ABERNATHY: Thank you for your comment. Nadine Greene-Hicks?

MS. GREENE-HICKS: Hi.

MS. ABERNATHY: Hi. Nadine, can you speak up a little bit to make sure we can hear you?

MS. GREENE-HICKS: Yes. Can you hear me?

MS. ABERNATHY: You're very low. Can you speak up a little higher or turn your volume up just a bit?

MS. GREENE-HICKS: Yes. Can you hear me better now?

MS. ABERNATHY: Slightly.

MS. GREENE-HICKS: Oh, gosh.

MS. ABERNATHY: Can I ask you to yell

at us today so that we can hear you?

MS. GREENE-HICKS: Yeah. How about now?

MS. ABERNATHY: It's a little better. We'll do our best. How about you got three minutes?

MS. GREENE-HICKS: Sorry. Okay, so I just wanted to say that PSLF is not about student loans. It's about the people who show up for all Americans: firefighters, social workers, mental health professionals, doctors, nurses, corrections officers, and more. We don't serve just Republican or Democrat Americans, not just white, Black, Hispanic, or Asian Americans. We serve everyone. That is what public service is. My story isn't different from a lot of people. I grew up in the foster care system and was adopted at 14. My adoptive family did not have the money to send me off to college. I had to apply for scholarships as well as being awarded some of the Pell that we qualified for. My dad was on Social Security and my mom was an LPN. They didn't really make that much money, but in the eyes of the Government and based on the rules, they had. I chose Human Services because I wanted to give back to youth and families just like those who supported me. I worked in juvenile corrections while in college, making 30K before taxes. My first job out of college in 2017 was in Child

Protective Services, earning \$27,000 and only taking home about \$24,000. Today, I'm grateful to make more money, but it doesn't feel like it. My mortgage is \$1,400, daycare is \$600, groceries \$600, utilities, car payments, insurance, all necessary, and rising. I bring home about \$3,000 a month and under the new IBR plan that I'd have to apply under, I'd owe about \$400 a month towards student loans. That's a big leap from the previous payment plan I was on. And like many Americans, our household recently took a hit. My husband, a good, strong man who cares deeply for his family, was laid off from work. Not a federal job, this was last year around Christmas. That loss of income put a serious strain on our finances. He found new employment, but it pays significantly, significantly less than what he had made before. He was recently hired into a better-paying role, but we're still recouping from the lost wages. And where family debt lives below our means, we budget, we plan, we do the best we can with what we have. My debt started at \$45,000, and that's not even counting the \$10,000 I had to pay towards my university because they allowed me to enroll while still carrying a balance. Public service workers like me don't do this work for the money. We pay with our hearts and our souls. Meanwhile, we've all seen government waste in other areas go unchecked. To those

opposed to PSLF, (20 seconds) with you for what shall a man profit if he shall gain the whole world and lose his own soul? You want to be selective about where your tax money goes? Fine. But consider this, PSLF isn't a loss, it's a moral investment. It's a chance to stand behind the people who stand for everyone else. Let's make America better by keeping our promises to those who serve. Thank you.

MS. ABERNATHY: Thank you for your comment. Michael Blackstone? Michael Blackstone?

MS. MCKAY: Hello.

MS. ABERNATHY: Janna McKay.

MS. MCKAY: Thank you. Good afternoon.

My name is-

MS. ABERNATHY: You have three minutes.

MS. MCKAY: Okay. Thank you. My name is Janna McKay, an accredited financial counselor and director of educational debt counseling and financial wellness at Oregon Health and Science University. I've spent the past 20 years in higher education, helping students, alumni, faculty, and staff navigate federal loan repayment and forgiveness programs. In my current role, I've had the privilege of helping the OHSU community secure over \$15 million in loan forgiveness

through the PSLF program. I've seen firsthand how transformative PSLF can be, not just for individual borrowers, but for the communities they serve. PSLF is more than financial relief. It's a social contract that ensures those who commit their careers to public service aren't burdened with lifelong debt for answering that call. PSLF and Income Driven Repayment support people in essential, often underpaid roles; teachers, healthcare workers, social workers, first responders, and others. Weakening or narrowing the definition of a qualified employer would create barriers for individuals to enter or remain in these essential professions that serve our communities. At OHSU, over 70% of our medical students who borrow Federal Student Loans depend on IDR and PSLF to make their career paths financially viable, from residency and fellowship through to practice. Students and alumni from our schools of dentistry, nursing, and public health also rely on these programs. PSLF plays a key role in shaping where they choose to train and ultimately where they serve. The same is true for our faculty and staff. PSLF affirms the value of their service by providing a path to financial stability, while supporting the broader mission of service-driven healthcare and education. Most importantly, they all rely on the original bipartisan definition of a qualified

employer, unchanged since the program's creation in 2007 as a stable and trusted foundation for their career and financial planning. PSLF is also essential for workforce stability in fields already facing staffing shortages. It is one of the most effective tools we have for attracting and retaining qualified professionals. Undermining PSLF puts public service and every one of our communities that rely on it at risk. Regarding IDR, I specifically want to call out ICR as any changes to or elimination of this plan could disrupt or completely stop borrowers' progress toward IDR or PSLF forgiveness. Many long-term borrowers consolidated their loans during the one-time account adjustment, and ICR is now their only eligible payment plan to reach forgiveness, since it does not require proof of partial financial hardship. These programs aren't perfect. They require ongoing oversight, simplification, and more effective outreach. But the answer isn't to restrict or dismantle them. We must strengthen and protect them, so they fulfill their promise to public servants and preserve trust in our higher education system. From first responders to healthcare workers, (20 seconds), these (inaudible) are the backbone of our nation's resilience and vital to every community. I urge the Committee to protect PSLF and IDR as critical investments in our public workforce, the

communities they serve, and the promise of a more equitable future for all Americans. Thank you for your time and consideration.

MS. ABERNATHY: Thank you for your comment. Aisha Baruni?

MS. BARUNI: Hello. Good afternoon.

MS. ABERNATHY: You have three minutes.

MS. BARUNI: Thank you. My name is Aisha Baruni. Thank you for the opportunity to speak. I'm a staff attorney with Legal Services NYC, the largest provider of free civil legal services in the country. Every day, we help low-income clients with their student loans. Many of our clients are disabled or work low-wage jobs. The vast majority want to repay their loans but need an affordable monthly payment plan that they can easily enroll in and remain eligible for. Right now, there are two types of repayment plans: standard and income driven. Standard plans pay off the student loan debt over a fixed period and don't consider household income. These plans can be extremely unaffordable. For example- I think numbers are good- a single borrower with no dependents with \$38,000 of Federal Student Loan debt, that's the national average, would have to pay approximately \$439 a month for their student loans on a

ten-year standard repayment plan. Unless you have a good job, this is going to be very difficult. That's why Income Driven Repayment Plans, IDR Plans that consider a borrower's income and household size, are so critical. Imagine that same hypothetical borrower has only \$30,000 a year of income. Under an Income Based Repayment Plan, IBR Plan, she would pay only \$62 a month, rather than be required to pay \$439 a month. But the promise of an affordable monthly payment plan vanishes for many parents who take out student loans for their child's undergraduate education. The IDR plan for Parent Plus borrowers available after they consolidate their loans is the Income Contingent Repayment Plan, the ICR Plan. Under an ICR Plan, our hypothetical borrower with \$30,000 of income has to pay \$249 a month. That \$249 ICR payment, yes, is significantly lower than the \$439 standard plan payment, but it's still likely unaffordable for a borrower with only \$30,000 of annual income. And it is much higher than the \$62 payment under IBR that would be available to a non-Parent Plus borrower. IDR plans are a lifeline for many borrowers, and borrowers and IDR plans have a lower rate of default than borrowers in other plans. But low-income Parent Plus borrowers often have no good repayment options, which increases the chance of delinquency and default. With these complicated options,

our clients need reliable information from their loan servicers to help them choose and enroll in the best repayment plan. Instead, borrowers receive inaccurate or generic servicer notices that only frighten and confuse them. Many borrowers cannot reach their servicers by phone, particularly (20 seconds) when borrowers can get through, they receive information that conflicts with the notices or is just wrong. This is an ineffective and inefficient system. Servicers need to be adequately staffed, properly trained, and more user-friendly. Finally, my clients, many of whom are seniors, are challenged by the yearly process to manually recertify their income for IDR plans. This process threatens borrower ability to stay on a plan.

MS. ABERNATHY: Time.

MS. BARUNI: Thank you.

MS. ABERNATHY: Thank you for your comments. Michael Blackstone? Excuse me. Michael Blackstone? Let me know when you're on, I'll give you your time. Dolores Niccolai, please let me know when you're on. Dolores Niccolai? Do we have Spencer Dixon?

MS. NICCOLAI: Dolores is here.

MS. ABERNATHY: Dolores, welcome. You have three minutes.

MS. NICCOLAI: Alrighty. So, thank you

for the opportunity to comment today on Public Service Loan Forgiveness or PSLF. I am Dolores Niccolai, principal loan and contract analyst and student financial support at the University of California Office of the President. The University of California enrolls close to 300,000 students and has 2.5 million alumni. You see both prepare students for careers in public service and employee's public servants. Economically, you see operations support 529,000 jobs in California and contribute \$55.8 billion to the state's gross product. As someone who is committed to public service, I urge you to preserve the current structure and employment eligibility criteria for the PSLF program. PSLF is a pathway for students and employees to serve in roles that are vital to the health, education, and welfare of the communities we live in and serve. Any change that refines or narrows the scope of PSLF employment undermines the statutory purpose of attracting students in public service roles. This also increases risk that presents eligible, eligible employers will lose highly qualified current talent to the private sector, as many valued public service roles cannot compete with private sector wages. In a 2024 study published in the Journal of American Taxation Association, the PSLF program promoted nonprofit employment and increased organizational effectiveness

across the nonprofit sector, with employee output exceeding the average PSLF forgiveness amount for 94% of nonprofits. Additionally, the communities served would bear the brunt of these changes. Reducing access to PSLF threatens the availability of qualified teachers, doctors, nurses, and other public service professionals in essential service settings. It risks creating service gaps and areas already facing workforce shortages. For example, the UC Berkeley Labor Center found that many public service occupations such as nursing, policing, and teaching had shortages that predated the pandemic and that those shortages have increased since then. These shortages have short and long-term impacts on the community's safety and prosperity. PSLF is an investment in the communities where people serve. I strongly urge the Department to maintain the current employment eligibility criteria and uphold the original intent of this essential program. Thank you again for the opportunity to provide comments today.

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

MR. BLACKSTONE: There we got it.

MS. ABERNATHY: All right. You have three minutes.

MR. BLACKSTONE: I am joining as a

veteran. I served Marines in the Army. I'm 61 years old this month, and I have over \$100,000 in student debt currently. I went to college later. That's the main reason for that. And my concerns for Income Driven come from a lot of places. But for one, a lot of people enter college, and they don't know what the final cost is. And my analogy is you don't buy a car and then find out a year later, well, now it's \$10,000 more. You need a second loan, and in the third year, it's \$20,000 more. I actually ended up with 15 different loans. And when they hit my credit, that reported 15 times delinquent. I went from a low 800 score to a 515 literally overnight. Some other concerns, just on the education side itself, for new families not in my scope, but college people that want to start families, they have to weigh- that's a big topic now, having babies. You can't weigh- you have to make a choice. You're going to pay your student loans, or you're going to start a family or buy a house. We really need an Income Driven Plan that also takes discretionary income based on what, maybe zip code, something like that. They cost somebody in California a lot more to live on the same income as it does in another state. I thought national security was part of it. You need people that are educated to hold the jobs here instead of bringing H-1b visa people to hold those jobs just because we don't

have people to do it. And then cost of living changes over time. What makes sense for like, a fixed payment today is not going to be any good ten years from now. Some things I did look at where the Income Driven plan had a higher payback rate compared to other plans. I think it was 6% default rate where other plans were 15% default rate. Some of the suggestions I have for an Income Driven were- however they do the formula, what they call discretionary income, really needs to be- (20 seconds). I would like to see a 1:1 tax credit or amounts actually paid to your student loans. I think that would encourage repayment ahead of schedule.

MS. ABERNATHY: Time. Thank you for your comments. Spencer Dixon?

MR. DIXON: I'm sorry. One second. All right.

MS. ABERNATHY: You have three minutes.

MR. DIXON: Okay. Thank you for the opportunity to provide comment. My name is Spencer Dixon. I'm a former student debt advocate, current student loan borrower and current state employee pursuing PSLF. In its April 4th posting announcing its intention to form a Negotiated Rulemaking committee, the Department identified changes to the PSLF, ICR, and PAYE programs.

For PSLF, I think it's important to look at what the law says. 20 US code section 1087e defines a public service job as a job for "an organization that is described in section 501(c)(3) of Title 26 and exempt from taxation under section 501A of such title," in addition to listing specific public sector jobs. The law is clear. If an organization meets these requirements, full-time wage employees are eligible for PSLF. Full stop. There exists no authority for the Department to make additional arbitrary determinations of which organizations may qualify. There is already an extensive nonprofit status review process at the IRS that ensures PSLF-eligible organizations are serving the public interest. It's disheartening to have to say this, but this should not be an invitation for this administration to abuse its power and politicize the nonprofit review process at the IRS. On March 7th, the White House released an executive order that calls on this Department and Treasury to restrict eligibility for PSLF to organizations for seemingly innocuous reasons like aiding or abetting violations of immigration laws and supporting terrorism. Without taking into account the previous actions of this administration, these restrictions seem like common-sense safeguards. But the American people are not stupid. They know that, like the unprecedented actions of deporting lawful residents

based on their nonviolent political speech or the rescinding of funding to public schools based on their support for transgender students or their promotion of diversity, equity and inclusion, these restrictions will be used to abuse power and punish people and institutions this administration disagrees with. As numerous courts have found, these actions are unlawful. And let's be very clear, an unlawful policy does not magically become lawful just because it goes through a formal regulatory process. That's not even to mention that this EO breaks a promise to millions of borrowers who already work or plan to work for affected nonprofits' (20 seconds) public interest. As for changes to ICR and PAYE, the law is similarly clear that payments are required for no longer than 25 years. Any change to extend repayment periods beyond that range would be unlawful. In the interest of time, I will end there. Thank you.

MS. ABERNATHY: Thank you for your comments. Kristie LaSalle? Kristie, let me know when you're on so I can tell you your time.

MS. LASALLE: I'm on, I believe. I believe I'm on now.

MS. ABERNATHY: Three minutes. Three minutes. Yes.

MS. LASALLE: My name is Kristie

LaSalle. I'm a lawyer, so I need to say that I'm here today in my personal capacity. Unlike many speakers today, I have no student debt. I've been lucky enough to pay back my loans in full, and I often hear that affordable student loan payments and Public Service Loan Forgiveness is a slap in my face, that because I paid my debts, PSLF is unfair to me. Let's talk about fairness. A while back, I loaned a friend money to start a house painting business, and he couldn't have gotten his business off the ground without that loan. And we made a deal. If he painted my house green every year for ten years, I'd forgive his debt. He agreed, even though that meant he had to pass up on other higher-paying gigs over the years in order to make good on that promise. And he's done a fantastic job for the past nine years. But this year I decided I'd rather paint my house blue. So, I told him our deal was off and that he owes me the full amount plus interest. Was that unfair? Is it cruel? It's both. And don't worry, my story is completely made up. But for thousands of Americans, that situation is very real. The government promised borrowers that serve their community for ten years and made affordable income-driven payments while they did, that their remaining debt would be discharged. But now the agency is contemplating defying that contractual promise. My sister works in a public

school and it's the middle of the school day, so she can't be here, and that means she can't stop me from bragging about her a little bit. She followed her dream of becoming a school psychologist, even though that would require advanced degrees for a very small salary. But because of Public Service Loan Forgiveness, and the promise that was written into her lending documents, she could make it work. So, she's been painting your house for nine years. She has made every payment on time. She has navigated the utter negligence of servicers like MOHELA, and she's been stuck in limbo for almost a year, because some attorneys general thought it was unfair to me that she should be able to afford her payments. And now, to hear that the agency is considering renegeing on its contractual promise after she's already performed 90% of her obligations, that is what is unfair. Our public servants deserve a repayment and loan discharge program that is strengthened, not diminished. Income Based Repayment plans should have updated discretionary income tolerances that take into account inflation and the cost of living. Protect the buyback program that remedies the months that borrowers have been forced into involuntary forbearances, even while continuing to perform qualifying service. Public servants should have their remaining balance discharged after they've held up their end of the

bargain. Our public servants deserve (20 seconds) that they have earned. Thank you.

MS. ABERNATHY: Thank you for your comment. Denisa Gandara, please let me know when you're ready.

MS. GANDARA: Hello. I'm ready.

MS. ABERNATHY: Three minutes, please.

MS. GANDARA: Good afternoon. My name is Denisa Gandara, and I'm an associate professor of educational leadership and policy at the University of Texas at Austin. I applaud the Department for taking steps to streamline Federal Financial Aid programs in ways that reduce burdens on both students and higher education institutions. First, I want to underscore the importance of not only maintaining but expanding access to postsecondary education as a driver of our nation's economic well-being. This includes four-year and advanced degrees, which are essential as well as associate degrees and shorter-term credentials. Our knowledge economy is central to America's global competitiveness, and that hinges on access to education for everyone, regardless of economic circumstances. Second, I want to offer a few suggestions for reducing the administrative burdens that students face in accessing federal financial aid, particularly through Income Driven Repayment plans. I

agree with the premise that simplifying repayment by streamlining IDR options into a single plan can reduce confusion and enhance transparency for borrowers. But simplification should not come at the cost of affordability or access. To truly support borrowers, the new plan should include strong protections such as a low-income repayment threshold, ideally 5%, and interest subsidies that prevent balances from growing when payments are too low. The new plan should also offer forgiveness after a reasonable period, ideally between 10 and 20 years, and to reduce informational barriers which are significant when it comes to Income Driven Repayment. The new plan should be paired with loan counseling and communication tools, and this is one area where AI could be leveraged to deliver personalized, accessible guidance. One word of caution here is that data protection and privacy should be prioritized. The new plan should also grandfather in existing borrowers and avoid forcing transitions into the new plan, which could disrupt the lives of those who made financial and life decisions based on current repayment terms. Crucially, any changes should preserve the Public Service Loan Forgiveness program. While refinements to improve access and clarify eligibility are welcome, changes shouldn't reduce benefits for public servants or discourage

talented individuals from entering public service. As we've heard throughout the day, teachers, nurses, public defenders rely on PSLF to sustain their livelihoods and to plan for the future. Finally, I urge the Department to put in place a plan to evaluate the effects of any changes made through this rulemaking process, including on borrower outcomes. In closing, students and borrowers are watching. As we've heard today, and as research confirms, loan uncertainty affects not just their (20 seconds) -but also their mental and physical health, their career paths, their workplace productivity, home ownership, and their family planning decisions. I hope this process results in reforms that make college more affordable, not less affordable for people seeking higher education and a better life. Thank you.

MS. ABERNATHY: Thank you for your comment. Rita Jones? Please let me know when you're ready.

DR. JONES: Hello. I'm ready.

MS. ABERNATHY: Three minutes.

DR. JONES: Hi. My name is Dr. Rita Jones. I am a student borrower and a member of the Community Action Council of the Project on Predatory Student Lending. My experience with predatory lending and deceptive practices in higher education has been both

deeply frustrating and disheartening. I attended Grand Canyon University to pursue a master's degree in counseling. Initially, the program seemed promising. However, as I neared graduation, I learned that many states require CACREP-accredited degrees for professional counseling licensure, something my program did not have. Without this accreditation, my job opportunities were severely limited. By the time I realized the limitations of my degree, I was drowning in debt without a lucrative career. Trying to pivot, I pursued a doctorate in healthcare administration at Capella University. The school advertised through my employer, which led me to believe it was a solid investment. Once again, I was disappointed as my institution's reputation hindered advancement. Today, despite holding two advanced degrees, I'm burdened with overwhelming student loan debt and stuck in a career far removed from my original aspirations. The emotional and financial toll has been devastating, and that's- even more heartbreaking is knowing that my story is far from unique. Colleagues who attended similar programs face the same barriers resulting in underemployment and massive debt. Now, the situation is poised to become even worse for borrowers like me. President Trump's plan to change Public Service, Public Service Loan Forgiveness, Income Contingent

Repayment programs, and Borrower Defense represents a direct threat to already vulnerable borrowers. If you eliminate or narrow these programs, you will effectively trap millions of borrowers in debt with higher payments for longer periods. These programs are often the only safeguards preventing low and middle-income borrowers from being crushed under unaffordable monthly payment, default, and lifetime debt. For those of us who were cheated by predatory schools, it is especially devastating because instead of a degree that would advance our careers, we got a lifetime of predatory loans that never should have been made in the first place. Poll after polls show Americans from both parties overwhelmingly oppose gutting student loan debt repayments like IDR. Voters are also overwhelmingly agreed that defrauded borrowers should be eligible for discharge of their loans. We need tighter oversight of both educational institutions, lenders, and servicers to prioritize student success over profit, not less. Thank you.

MS. ABERNATHY: Thank you for your comment. Amy Wiesbrock? Let me know when you're ready. I'll start the clock. Amy Wiesbrock?

MS. WIESBROCK: Hi.

MS. ABERNATHY: Hi. Three minutes.

MS. WIESBROCK: I'm here to speak about the need to continue the important Public Loan Forgiveness program. It is critical to help our overall community to have nurses, doctors, public prosecutors, public defenders, social workers, and more. I want to state that the cost of college has significantly increased over the past 40 years. I graduated higher education over 20 years ago and enjoyed much lower education costs as well as a low interest rate when I graduated. I was lucky. The cost of higher education has increased in multiples of inflation, and the interest rates have also increased at the same time. This has made the Public Loan Forgiveness program and other income-based programs even more important. The New York Times podcast, The Daily, had an interesting podcast ten days ago, on April 21st, that went through the history of what occurred, and I feel that this would be a good source for all of you to look at. I am highly concerned on the millions of people who are currently stuck through no fault of their own, in the same forbearance, forbearance due to the current lawsuit, and I am concerned that the millions of students who have recently graduated and are about to graduate, with the stress of the discussions and potential risks to the Public Loan Forgiveness programs. Please, the one thing I ask you is do no harm. I have

worked in the nonprofit field for almost two decades, most in the housing, unhoused, and the eviction prevention areas. One thing that I do know is that preventing an eviction is 10% of the cost of helping those once they become homeless. We need to make sure that those loan forgiveness programs are more robust and not less. Otherwise, we are going to have a significant number of our community members who come even closer to the brink of losing their homes. Thank you for your time.

MS. ABERNATHY: Thank you for your comment. Jennifer Poole? Please let me know when you're ready. Jennifer Poole?

DR. POOLE: Hi.

MS. ABERNATHY: Hi. Three minutes.

DR. POOLE: All right. Sounds good.

Hi, everyone. My name is Dr. Jennifer Poole, and I conduct research and coaching for higher ed and workforce development organizations. I urge the Department to do the following in writing the rules for PSLF and financial aid, both for undergraduate and graduate borrowers. First, implement an Income Driven Repayment plan that truly meets people where they are. I was originally on REPAYE. I didn't ask to be moved, but the Government transitioned me to SAVE. However, both plans offered manageable payments based on real-life income. I

appreciate the goal of simplification, but not if simplification just raises the payments across the board. We don't need fewer plans if they leave borrowers behind. Second, use take-home pay, not gross income to calculate the loan repayment and cap PSLF payments at no more than 5% for undergraduate and graduate loans. Gross income overstates what borrowers actually have to live on. Many graduate borrowers work in lower-paid public service roles and should not be expected to pay more than others. A single 5% cap based on take-home pay is clearer, fairer, and more sustainable. Third, protect borrowers with high debt burdens from being penalized. According to Dr. Daniel Collier at University of Memphis, those most likely to be in IDR plans are borrowers with high balances, middle earners, women, and minorities. The exact groups that PSLF and IDR are intended to support. Now, graduate school wasn't what I was told it would be in terms of cost. My fully funded program didn't cover basic living expenses for a 32-year-old adult with work experience. I worked nights at a bar, made coffee, and rented a single room in a family's home across the hall from their five-year-old. I made it work because PSLF and IDR gave me hope that my service would be recognized, and my payments would be affordable. I went on to complete an award-winning dissertation that brought undergraduate

women together to share their experiences with MeToo on campus. One day, I hope to launch a nonprofit that focuses on this and other intractable problems in education and workforce development, solutions that empower learners and workers and create meaningful change. But today, I spend hours navigating PSLF paperwork and uncertainty, time and energy I would rather spend building the public good. Now I owe \$165,000. I can handle whatever the Department throws at me, but not everyone can. I'll also have to make sacrifices to do it. Possibly the last years of my fertility and the chance to start a family. I share this not to ask for special treatment, but to show what it costs to stay in public service, especially if these rules are not written in a way that meets people where they're at. I'm asking that you please write the PSLF and IDR rules in a way that truly meets people where they are, keeping opportunity open for future generations and fighting back against a brain drain that is, I'm afraid, potentially coming soon. Thank you.

MS. ABERNATHY: Thank you for your comment. Dr. Asmara Hoo-Cardial?

DR. HOO-CARDIEL: Hello?

MS. ABERNATHY: Hi. You have three minutes.

DR. HOO-CARDIEL: Thank you. My name is Dr. Asmara Hoo-Cardiel, and I'm a physician and training graduating fellow in child and adolescent psychiatry. I've been in training for ten years, medical school for four years, psychiatry residency for four years, and subspecialty training in child and adolescent psychiatry for another two years. I'm also a daughter of immigrants, a daughter of a single mother, a mother myself to a 14-month-old, a wife, a sister, a friend, an aunt, and niece. And I am the first in my family to become a physician. I'm here today to advocate for PSLF and strongly oppose changes to the Student Loan Forgiveness programs. And like so many other medical trainees, I pursued a life in medicine because I wanted to help people. It was in high school when I was first inspired by my pediatrician to become a physician. I later committed to this school after finding out about the PSLF program during my first year of college, as I knew it would require a significant amount of financial resources. I attended a local state university, and upon college graduation, I worked as a middle school math and science teacher for two years to save for application fees. You can imagine how I felt upon my first acceptance to medical school. It was life changing and I knew it would change the course of my family for years to come.

Like the majority of medical students, I needed student loans to finance my way through medical school. The average medical student has over \$240,000 in student loan debt. My tuition alone in total was about \$200,000, and this doesn't include costs for board exams, prep courses, residency applications, and living expenses. After all this time invested, I have seven and a half years' worth of eligible payments towards PSLF to date. Shifting gears, without the promise of PSLF, I worry about what this means for the impending workforce shortages in healthcare. Healthcare workers might be forced to consider higher-paying jobs in the private sector, which could lead to a reduced workforce and community mental health centers, federally qualified health centers, and other safety net hospitals. I worry about less physicians pursuing lower-paying specialties, such as in pediatrics and primary care. I worry about what this means for access to services for patients. Even now, it's not uncommon for patients to wait six months to over a year to see a psychiatric provider or therapist. I worry about what this means for ongoing burnout in physicians of all specialties and sustaining the future of the healthcare workforce. Because of this, I'm advocating for the following: one, investing more resources into the PSLF program so applications, inquiries, submissions can be

processed within a reasonable amount of time so that service representatives can be reached to answer questions borrowers may have about their account. Two, (20 seconds) maintaining affordable, Income Driven Repayment plans, including how minimum monthly payments are calculated when filing taxes separately from a spouse. Three, continue to count payments during medical training for doctors and dentists because without this, it would disincentivize those pursuing the medical field. And lastly, four, maintaining tax-exempt status for nonprofit hospitals and healthcare agencies, which allow not only doctors to qualify for PSLF, but nurses, social workers, therapists, medical technicians, speech pathologists, physical therapists, dietitians and administrators, and more.

MS. ABERNATHY: Time.

DR. HOO-CARDIEL: Thank you for this opportunity for my personal testimony today.

MS. ABERNATHY: Thank you for your comment. Lewis Derrick? Please let me know when you're ready. I'll start the timer.

MR. LEWIS: Hey, can everyone hear me?

MS. ABERNATHY: Yes.

MR. LEWIS: Hey, good afternoon. My name is Derrick Lewis, II. I'm from a small town by the

name of Lamar, Texas. But currently reside in Hyattsville, Maryland. I serve as the interim national director for the NAACP Youth and College (inaudible), representing over 28,000 youth members that make up 700 college chapters, youth councils, and (inaudible) across the United States. The Public Service Loan Forgiveness Program was created to honor those who dedicate their lives to serving others, but for far too long it has been broken promises more than benefit. While reform is long overdue, today's proposed changes do not move us forward. They drag us backwards. Let's be clear, the Administration is (inaudible) the historic and legal use of waivers that helped correct years of failure. That temporary relief didn't abuse the program and honor public servants who had already done the work and were wrongly denied forgiveness. Walking back that relief or threatening to revoke earned forgiveness would be a cruel and unjust behavior to Americans, and we cannot allow that practice of this process to become an excuse to punish borrowers retroactively. No one should have to fear losing their relief that they've already been promised, especially those who've stepped up during the national crisis. We have an opportunity now to expand, not restrict, the PSLF program. So finally, ensure that all public servants, regardless of race, occupation,

background, can access this program. Teachers, organizers, healthcare workers, city employees and nonprofit staff all keep this country working. The work that they do is public service-

MS. ABERNATHY: Mr. Lewis?

MR. LEWIS: Correct.

MS. ABERNATHY: Mr. Lewis?

MR. LEWIS: Hello? Can you hear me?

MS. ABERNATHY: Yes, I stopped your time. Please continue.

MR. LEWIS: Thank you. The work they do in public service is not- is their debt- should not be- - the work they do in public service and their debt should not be a life sentence. We must also stop sharing the idea that some jobs are worthier than others. Black borrowers in particular are disproportionately represented in roles that sustain communities, yet they've received (inaudible) little relief. This isn't just a flaw in administration systematic injustice. The PSLF, the PSLF program must work not just for today's workforce, but for future generations who should not inherit a system designed to fail them. Let me be clear, the NAACP supports the meaningful PSLF reform, not political attacks, colloquial language for fake forgiveness already granted must be protected, and

expansion must reflect the real lives, real jobs, and real service of the people this program was built for. We can fix the Public Service Loan Forgiveness program, but only if we choose justice over politics and people over prejudice. Thank you for your time today.

MS. ABERNATHY: Thank you for your comment. Kulwa Aparara? Kulwa Aparara? If you will let me know when you're ready so I can start the timer.

MS. APARA: Greetings.

MS. ABERNATHY: Ready?

MS. APARA: Yes, I'm ready.

MS. ABERNATHY: Three minutes.

MS. APARA: Good afternoon, everyone. My name is Kulwa (inaudible) Aparara. It's a pleasure to be here. I was very excited when I received the email and I said, I have to speak if I am able to, as an American citizen. I am a millennial. I'm actually the first of my family's generation. I mean, of my family's bloodline. Me and my twin sister and our younger sister to be born post-civil rights, meaning all of my parents and all of my grandparents were born either under legal segregation or some type of legal, sanctioned oppression or systemic injustice. I am the first of my generation to really kind of come off or get a start on a- somewhat of a fair footing. I come from a social worker mom and a bilingual

schoolteacher dad. I do not come from any type of generational wealth. Everything that I have gained has been through hard work. I am a product of public schools, including the University of California at Berkeley. And for graduate school I went into considerable debt, including a medical school program that I had to not finish because the loans were just enormous. It was an overseas Caribbean but accredited university. And I want to say that we have a lot of foreign-trained physicians, because it's actually more affordable to attend a medical school in a different country and come here and pass the boards. I would say that a lot of working-class Americans like myself deserve access to equitable loan forgiveness. I am in so much debt at this moment and it is unbearable. I live in the Bay Area where we already have \$3,000 rent, and people like me who dedicate their life to the public service sector, we deserve a fair chance. Because I work for a nonprofit that does DEI work, now, it has been said that my loan forgiveness (20 seconds) will not be honored. Please have a heart and thank you all for your time.

MS. ABERNATHY: Thank you for your comment.

MS. APARA: Thank you, Tamy.

MS. ABERNATHY: Julie Tanguay? Julia,

excuse me. Julia Tanguay?

DR. TANGUAY: Yes. Hi. How are you?

MS. ABERNATHY: Hi. You have three minutes.

DR. TANGUAY: Thank you. My name is Dr. Julia Tanguay, and I'm a pediatrician. I've been a general pediatrician now for five and a half years, not including my residency. I did my training in Ohio and then worked in the emergency department for two and a half years before I moved back to Colorado to do primary care in Colorado Springs. I am here today to talk about and give testimony about my professional service and how I've worked in the public sector now at nonprofit organizations since 2016. This has included my residency and all the places I've worked since then. I will be due for forgiveness, if it hadn't been for the SAVE injunction in December of 2026, and I'm restarting payments with Income Based Repayment this month. I'm not sure if the members of this hearing are aware of this fact, but pediatricians are the lowest paid medical specialty, and knowing that I wanted to do pediatrics, I worked throughout my undergraduate studies and worked service jobs. I also lived with my parents at home for two years to save money and to try to take out less loans than- as much as- least amount of loans as I could. And I

also went into pediatrics because I wanted to help children who cannot always advocate for themselves. When George W. Bush signed the bipartisan Public Service Loan Forgiveness program into law, I was in shock. I didn't know that this was real or if it was legitimate. When I learned more about it, I knew that this would be my path to become the pediatrician that I am now, and what I do today. I currently have \$345,000 in student loan debt, even after paying for seven years on my loans. I want to briefly shift to talk about the patients that I serve. My specific panel is about 700 patients right now. Forty-two percent of my patients use Medicaid. 23% of my patients use Tricare, which is the military insurance, and the remainder use commercial insurance and self-pay, which is about 28% and 1%, respectively. With this breakdown, the majority of my patients are either children with disabilities, foster children that rely on Medicaid, and other under-resourced families that utilize Medicaid, or military families that are on Tricare. In my region, there's a scarcity of pediatrics. It's very difficult to find someone, and I can only do what I do because of Income Based Repayment and the Public Service Loan Forgiveness program. I recently heard that the House Education and Workforce Committee has plans to take away (30 seconds) -for dental and medical professionals to

pursue public service while in training. This will be detrimental to pediatricians like myself and future medical students from pursuing care for children. I want you to know that it will make payments unaffordable, and people won't be able to be physicians, and we're facing 180,000-.

MS. ABERNATHY: Time.

DR. TANGUAY: Thank you.

MS. ABERNATHY: Thank you for your comment.

MS. STANLEY: Hi. Good afternoon.

MS. ABERNATHY: Hold on one second.

MS. STANLEY: Okay.

MS. ABERNATHY: I need to make sure I get your time straight. Just a second. Hello, Alexis Stanley.

MS. STANLEY: Yes.

MS. ABERNATHY: One second.

MS. STANLEY: No problem.

MS. ABERNATHY: You have three minutes.

MS. STANLEY: Thank you. Good afternoon. My name is Alexis Stanley. Thank you to the Department for the opportunity to provide public comment. I am a student borrower and a member of the Community

Action Council of the Project on Predatory Student Lending. Today, I speak not only as an advocate for stronger loan repayment and relief options, but also as someone who has personally experienced the devastating impact when protections for student borrowers fail. In 2008, I enrolled at Florida Coastal School of Law, a for-profit institution that aggressively marketed itself as an affordable, ABA-accredited path towards a successful legal career. They promised bar passage support, job placement assistance, and strong career prospects, none of which matched the reality. Years later, the Department determined that Florida Coastal had defrauded students through deceptive marketing and misrepresentations about employment outcomes, bar passage rates, and accreditation status. To fund my legal education, I took out substantial federal loans based on these false promises. Although I eventually graduated from a different law school and built a career, I'm proud of today, the debt I incurred at Florida Coastal continues to haunt me. It has impacted my ability to save, build wealth, and plan for the future, and it represents a burden I never should have had to carry. I filed a Borrower Defense application seeking relief, but the process has been slow, confusing, and quite honestly, disheartening. There have been long periods of silence, changing guidance, and no clear

timeline for resolution. Even after institutional misconduct is confirmed, borrowers are left in limbo, emotionally and financially. This isn't just an administrative failure. It's a failure of justice. I urge the Department to act boldly to fulfill its commitment to borrowers. Specifically, first ensure that repayment plans are truly affordable by creating structures that do not trap people in perpetual debt. Loan repayments should reflect a borrower's reality, not punish them for pursuing higher education. Second, create clear and attainable pathways out of student debt, including streamlined and automatic forgiveness, where appropriate. The system should not require borrowers to relive their trauma through endless paperwork and procedural delays. Third, hold institutions accountable when they defraud or mislead students with relief that is automatic once misconduct is confirmed. Borrowers should not be required to fight for years to receive justice after being wronged. No borrowers should need legal (20 seconds) representation. Media coverage or political advocacy just to access protections the law already guarantees. Thank you again for your time and for your commitment to reforming a system that must do better for current borrowers, for future students, and for the integrity of higher education. Thank you.

MS. ABERNATHY: Thank you for your comment. Preston Cooper? Please let me know when you're ready.

MR. COOPER: I'm ready. Thank you.

MS. ABERNATHY: Three minutes.

MR. COOPER: Good afternoon, everybody, and thank you so much for the opportunity to provide a public comment today. My name is Preston Cooper. I'm a senior fellow at the American Enterprise Institute, where I focus on federal higher education policy. My comments represent my own views. I'm pleased that the Department will convene a Negotiated Rulemaking committee on several topics related to the Title IV programs. The Department has stated its interest in potential topics that would streamline current Federal Student Financial Assistance Program regulations while maintaining or improving program integrity and institutional quality. As Secretary Linda McMahon wrote in a recent op-ed for The Wall Street Journal, colleges and universities have profited massively off the federal subsidy of loans. Meanwhile, quote, many of the degree-granting programs that qualify for student loans are worthless on the job market, but colleges continue to accept students to these programs and encourage them to borrow to pay for them. Secretary McMahon noted her

commitment to preventing colleges from, quote, creating such massive liability for students and their families, jeopardizing their ability to achieve the American Dream. Fortunately, the Secretary has the authority to hold colleges accountable for poor student outcomes. She may exercise this authority by promulgating a regulation through the Negotiated Rulemaking process, to implement a quality assurance system for institutions that participate in the federal direct Loan program. The Higher Education Act states that an agreement with an institution of higher education for participation in the Direct Student Loan Program shall provide for the implementation of a quality assurance system as established by the Secretary, to ensure that the institution is complying with program requirements and meeting program objectives. The Department could invoke this clause to develop a system of quality assurance to ensure that the roughly 4,800 institutions, which received over \$83 billion in Direct Loans last year, are meeting the objectives of the loan program. These objectives include ensuring that aided students enjoy economic mobility and that taxpayers are repaid in full. Thank you for the opportunity to provide public comment today and for taking under consideration my suggestion to include establishing a quality assurance system as a

topic in the Department's upcoming Negotiated Rulemaking convenings. This concludes my remarks.

MS. ABERNATHY: Thank you for your comment. At this time, we're going to take a ten-minute break. We will resume back, we'll just say 11 minutes so that we can come back at 2:20. Welcome back, everyone. Carron Johnson, if you would ready yourself and let me know when you are ready, I'll give you three minutes.

MS. JOHNSON: Hi, it's Carron, and I am ready.

MS. ABERNATHY: Carron, thank you for correcting me. I appreciate that, I apologize.

MS. JOHNSON: No problem.

MS. ABERNATHY: Three minutes.

MS. JOHNSON: Hi, I'm Carron Johnson, a paraprofessional for Saint Louis Public Schools. I'm vice president of the paraprofessionals for AFT Saint Louis Local 420, and I am also the president of the AFT for the state of Missouri. But please call me CJ. Thanks again for the opportunity to be present and to be heard. I deeply appreciate the opportunity to share my story about the importance of PSLF, and why it must be preserved as it is. I've been in and out of school for some time, not because I didn't want to succeed, but because the system has made it hard for people like me to

push forward. Our college programs often go under-supported, and educators aren't always paid enough to stick around. That lack of stability and encouragement affects us, affects us as students. It's tough to stay motivated when the support just isn't there. When I first heard about PSLF, I'll be honest, I was skeptical. I didn't believe it because in roles like being a paraprofessional, we're often overlooked for those programs that are designed to relieve burdens and build futures. Most of the time, teachers often have those access to the grants and other support systems, but we rarely see those opportunities. Once again, when I heard about it, I was like, this can't be real. But I took the chance. I went through the process myself, and it worked. I received \$12,000 in forgiveness, which directly supported my previous journey, earning a degree in automotive technology, as I'm still in school right now for secondary English. That changed a lot for me. I was so moved by the impact that I asked to be trained to help others access that same opportunity. Since then, I've had countless people reach out to me thanking me. Some even took me out to lunch because they saw money return to their accounts. I'm grateful not just for myself, but for the ripple effect it has created in my community. While my entire loan wasn't forgiven, that \$12,000 lifted a

massive weight off my shoulders. I was a single parent, working low wages and still trying to stay in school. Still in school now. And even though I graduate this year, I plan on- to keep going until I become Dr. CJ. This journey just isn't about me. It's about paving the way for those who come after me. Many of us can't afford to send our children to college, based on our bank accounts, especially me. I have an 18-year-old. Some of our parents never had the chance to attend college themselves. And yet here we are, paying thousands of dollars just to serve the world through community and education work. I didn't choose education and union work because it pays well. I chose it because I believe in making a difference and I know I'm not alone. Let's keep working together to create access, breaking down barriers, and uplift the next generation. Our children deserve more and (20 seconds) we can be the ones to make sure they get it. Thank you all so much, and I am finished.

MS. ABERNATHY: Thank you for your comment. Bryan Brown? If you'll let me know when you're ready, I'll start the timer.

MR. BROWN: I am ready. Can you hear me?

MS. ABERNATHY: Yes, sir. Three

minutes.

MR. BROWN: All right. Good afternoon. My name is Bryan Brown, and I'm a resident of Riverton, Wyoming. I'm also a schoolteacher for Fremont County School District number 24 in Shoshoni, Wyoming. In July of 2024, my student loans, which I paid under the SAVE Income Based Repayment Plan, was put in administrative forbearance. At the time, I was 29 payments away from the Public Service loan forgiveness, but due to this administrative forbearance, those months of credited payments are no longer accruing. A month later, in August of 2024, I was diagnosed with renal cell carcinoma, which has since metastasized and progressed to stage four. The median life expectancy of someone with stage four RCC is 22.5 months, making it statistically likely my student loans will be discharged by my death before they are officially forgiven through the PSLF program. If the Department denies loan forgiveness and strips away the SAVE and PAYE programs, many Americans will share my likely fate. They will be crushed under the weight of increased payments. Under the SAVE plan, it is possible for my wife and I to make student loan payments- my student loan payments and pay for my cancer treatment. Should that plan go away permanently, we will have to make a choice between the two. And I don't have to tell

you what choice we will make. In the media and in the current administration, there is a narrative that those who have benefited from the SAVE program are freeloaders, but in fact, many Americans under that program share the same circumstances as me. Like me, through no fault of their own, they are stricken with a disease that limits their earning ability, or they are the caregivers of one of those people, or they are simply the victims of a shifting economy where their role in a post-AI world is as in question. Either way, the SAVE and PAYE plan provide Americans with a pathway towards continued health and productivity. Furthermore, significantly increasing student loan payments for borrowers, borrowers who were often in the prime of their lives and looking to marry and start families will have an adverse effect on the already declining birth rates in this country. Who can bother to have a family and still pay 15% of their discretionary income to the government, with no end in sight? Both Elon Musk and Vice President Vance have gone on record about their concern over the declining birth rate in the United States. And yet, this policy change would prohibit the outcomes they favor. I would like to close this testimony to the committee with the- with a final plea. Please remember that decisions that you make have human consequences. This is not an abstract decision

with nebulous far-flung effects. My own circumstance is just one of many. The policies decided here will immediately and directly affect (20 seconds) the daily lives of millions of Americans. (inaudible)

MS. ABERNATHY: Thank you for your comment.

MR. BROWN: Thank you.

MS. ABERNATHY: Amber Hay? Amber, if you let me know when you're ready, I'll start the timer.

MS. HAY: I'm ready.

MS. ABERNATHY: Three minutes.

MS. HAY: My name is Amber Hay, and I serve as the Public Service Loan Forgiveness advocate in the Washington State Office of the Student Loan Advocate. Our office works directly with borrowers every day to help them resolve challenges in navigating the complexity of the Federal Student Loan system. My focus on working with borrowers pursuing PSLF has given me unique insights into how changes to the PSLF program and Income Driven Repayment options may impact borrowers. Thousands of Washingtonians have made the decision to serve our state through public service, counting on the promise of forgiveness after ten years. To date, over 22,000 Washingtonians have earned that PSLF forgiveness. That translates to over 200,000 years of collective work

dedicated to helping individuals and communities, often at great personal sacrifice. This exemplifies the success of the PSLF program in its original intent to incentivize long-term commitments to public service, fulfilling critical shortages in areas such as education, healthcare, and community safety. Any action taken to reduce the number of employers eligible for PSLF will harm Washingtonians by potentially intensifying public workforce shortages. Employer eligibility criteria should be consistent, predictable, and not subject to change each election cycle. The criteria should reflect Congress's intention to support those who provide critical services to communities across the country. If the Department seeks to review employer eligibility for PSLF, it should be in an effort to expand and simplify criteria, not reduce it, politicize it, or make it more complex. Many public servants work in chronically low-wage sectors with the promise of access to PSLF and affordable monthly payments through Income Driven Repayment plans. The success of the PSLF program is therefore reliant on access to affordable IDR plans. Reducing access to IDR plans like PAYE and ICR may force borrowers into other repayment options that do not qualify for PSLF. In turn, borrowers may have to turn away from vital public service careers, which means less

nurses, teachers, first responders, and other critical public service workers available to support our local communities. Rather than reducing or eliminating affordable IDR plans, the Department should instead turn their attention to student loan servicer oversight. Delays in processing and communications, mistakes in managing borrower accounts, and lack of customer service availability continue to do irreparable harm to borrowers. The Department has an inherent responsibility to protect student loan borrowers and decreasing access to or eliminating IDR and PSLF should not be an option. In closing, I urge and encourage the inclusion of dissenting voices in the Negotiated Rulemaking process, including folks (20 seconds) that may disagree with the ideas espoused by the current administration. Several states across the country employ state student loan advocates and ombudsmen who are on the ground working with borrowers every day. We see the real-world impact that policy changes have on borrowers and can provide perspectives essential to balanced decision-making. Thank you for your time.

MS. ABERNATHY: Thank you for your comments. Anna? Confirming that we're still live, everyone?

MS. KUAN-CELARIER: Hello.

MS. ABERNATHY: Anna, if you'll give me just a second, I want to check with the team that we're still live. I've gotten a few messages on my screen that says we're not live anymore. All right, we have the all clear. Anna, you have three minutes.

MS. KUAN-CELARIER: Thank you. And thank you for the opportunity to speak today. My name is Anna Kuan-Celarier, and I am a gynecologic oncologist, a specialist in cancers of the female reproductive system. I'm just about as specialized as you can get in the medical field, and it took me 35 years of nearly continuous education and medical training to get here. I just started my first big girl job at the age of 36. I love my job as an academic GYN oncologist. I'm passionate about research. My research focuses on how to make cancer treatment less toxic for older adults. I also love being involved in educating the next generation of OB/GYNs and cancer specialists. To be able to do cancer research and to train junior doctors, I have to practice at an academic medical center, where I make about 50 to 60% of what I can make in private practice. But it is worth it to me because I know that I am using the knowledge and skills I've gained through my education and training to make the most important contributions to science and medicine. At age 36, a lot changed in my financial life.

After nine years of secondary education where I wasn't making any money and seven years of medical residency and fellowship where I was making just enough to live on, I was finally able to start doing things like saving money for retirement and down payments for a house. At age 36, I also became financially responsible for two new people. I gave birth to my first child, and I became the caretaker for my mother, who has Parkinson's disease. My partner, who is a research scientist, contributes to our household, but I am financially the family breadwinner and primarily support all four of us. I'm certain that anybody who has been a member of the sandwich generation can relate to what this responsibility feels like. At age 36, I also had to start making serious payments towards my \$670,000 in student loans from undergraduate studies, a master's degree, and medical school. With compounding interest, my loans have essentially doubled every nine years over the 16 years of my education and training. The Income Driven Repayment programs and the Public Service Loan Forgiveness program were the only way I felt I could accept a job in academic medicine and still be able to support my family and avoid a future of destitution in retirement. These programs offer assistance to members of our society who deserve it the most. Those who serve the public, like doctors and teachers, those who work hard to

support their families, and those who want to build a better future for America. University education in America is significantly more expensive than in any other country in the world, but high rates of secondary education have helped contribute to our economic, not to mention intellectual, success to date. Programs like Income Driven Repayment and Public Service Loan Forgiveness are critical to continuing to promote economic and intellectual growth and excellence in our countries. (30 seconds) Thank you.

MS. ABERNATHY: Thank you for your comments. At this time, we will take a break until 2:45. Welcome back, everyone. At this time, I would like to know if Chris Moody is ready? If you'll let me know when you're ready, I'll start the timer for three minutes. Chris Moody?

MR. MOODY: Yes. Good afternoon.

MS. ABERNATHY: Good afternoon. You have three minutes, sir.

MR. MOODY: Thank you. My name is Chris Moody, and I serve as the executive director of ACPA College Student Educators International. I want to thank you for this opportunity to speak about a matter at the very heart of ACPA's mission, ensuring that every student, regardless of their background and previous

opportunities, has access to higher education through robust student financial assistance programs. In ACPA, our work centers affordability, accessibility, and the incredible transformational power of education. We know that financial support is not just about dollars and cents. It's about opening doors. It's about allowing students to imagine and pursue futures that would otherwise be out of reach. Programs like Pell Grants, TRIO, GEAR UP, the graduate assistance in areas of national need, and the Public Service Loan Forgiveness are not optional. They are essential. These initiatives ensure that talented individuals from all walks of life have the chance to enroll, persist, and thrive in college. Research repeatedly shows that not all K-12 schools receive equal funding and resources, with districts serving higher proportions of low-income and minority students often receiving fewer resources. This resource inequity is evident in areas like per student spending, student teacher ratios, class sizes, teacher experience, and teacher qualifications. Without continuing to support college impact programs, our nation's future workforce and leadership will suffer from a diminishing supply of talent. By 2033, the Bureau of Labor Statistics projects 4.6 million new jobs will require a postsecondary credential. To meet that demand,

we must invest in students today. College graduates don't just earn more over their lifetime, they also contribute more. They are more likely to be employed, to innovate, and to even pay it forward, often by returning to serve their local communities. This is especially true when talking about public service and Public Loan Forgiveness programs. These pathways empower graduates to pursue careers in education, healthcare, social work, and beyond. Careers that are essential to the well-being of our society but often come with lower salaries. Without financial assistance, many of these students would feel forced into private sector jobs just to make ends meet, leaving local communities continually under-resourced and unsupported. Today, I'd like to remind us, access to financial assistance is access to opportunity for individuals (20 seconds) for families, and for societies. I ask that we never forget that if we remove financial barriers, we don't support individual students and their families, we strengthen local communities as well as our national economy. Thank you for your time and consideration.

MS. ABERNATHY: Thank you for your comments. Jerry Whitmore. If you'll let me know when you're ready, I'll start the timer.

DR. WHITMORE: I'm ready. Thank you.

Good afternoon, and thanks for the opportunity to speak. My name is Dr. Jerry Whitmore, Jr., Assistant Professor of Higher Education at Boston University's Wheelock College of Education and Human Development, and a board member of a local education nonprofit. I grew up in a single-parent household in rural Tennessee. My mother worked in a factory to put food on the table to keep three boys out of trouble. She earned her GED later on in life, and college wasn't something I was sure even meant for someone like me. Coming from a low-income background, the PSLF program was a lifeline. It helped me break a cycle of generational poverty. Because of PSLF, as a first-generation college student, I was able to pursue a career in education, not just to teach the next generation, but also to research how we can make education more effective. Today. I support my family, give back to my parents, the community, and the state. That's the promise of PSLF. We must be mindful not to build policy around false narratives. The people served by PSLF, public school teachers, early childhood educators, healthcare workers, public defenders, and others are not a threat to society. They are the backbone of local economies and thriving democracy. The executive order issued on March 7th suggested excluding organizations that allegedly have a substantial illegal

purpose, a vague and politically charged criterion that threatens to disqualify legitimate nonprofit entities providing vital public services. PSLF was never about politics. It was about service sustainability, ensuring that people from all walks of life could afford to give back, undermining that now risk not just careers, but entire communities losing the public servants they depend on. And let's be clear, any effort to also eliminate Student Loan Forgiveness programs under ICR and PAYE would directly attack working-class Americans who have played by the rules. These programs are not giveaways. They are carefully designed to promote personal responsibility while recognizing that borrowers should not be punished for choosing service-oriented or modest-paying careers. To ensure legal clarity and long-term sustainability, the Department should codify longstanding forgiveness provisions and maintain borrower accountability through sustained payment requirements. Preserving these programs aligns neatly with the administrative rewarding work, promoting personal responsibility and upholding the Federal Government's word to its citizens. And finally, streamlining Title IV regulations can encourage innovation in higher education, but changes must be targeted and transparent to avoid waste and fraud while reducing red tape is essential for

career-connected education and meeting the needs of adult learners. We must be cautious of deregulation that enables predatory practices, especially in low-quality online programs. This administration has a chance to support accountable innovation that enhances workforce development and economic mobility. But it must protect students and taxpayer investments for exploitation. In sum, (20 seconds) I support efforts that streamline- Thank you so much for the time.

MS. ABERNATHY: Thank you for your comment. Monnica Chan, if you'll let me know when you're ready, I'll start the timer.

MS. CHAN: Great. Thank you. I'll start a timer of my own as well.

MS. ABERNATHY: Ready?

MS. CHAN: Yep.

MS. ABERNATHY: Three minutes.

MS. CHAN: Thank you so much. Thank you. Hi, everyone. Good afternoon. Thanks for the opportunity to comment today. My name is Monnica Chan. I'm an assistant professor at the University of Massachusetts Boston, where I study the impact and interaction of State and Federal Financial Aid programs, including loan repayment. In ongoing work, colleagues and I have documented how the recent instability in loan

repayment program availability is stressful and confusing to borrowers. We heard from multiple borrowers in our study that between the changes with the SAVE Plan proposal and the recent changes to the IDR applications that they would have liked to sign up for an Income Driven Repayment plan, but they were confused by the quick and frequent changes both in program and application availability. The back and forth of whether or not a program is available or not exacerbates the challenges that borrowers face in seeking and selecting an appropriate repayment plan. And for borrowers that are grappling with other life events and transitions, this complexity and evolution of all of the different Federal Student Loan repayment plans is just sort of an additional layer to what borrowers have described as a stressful and heavy responsibility that they want to fulfill. In my work, I've also found that entering repayment coincides with other important milestones in emerging adulthood for recent college graduates. So multiple participants in our study experienced life events outside of their control. These were things like work-related injuries, flare-ups from a chronic health condition, looking for a job and then being only able to secure a per diem job, things like that. And for those individuals navigating loan repayment became an increased

burden that ended up exacerbating their feelings of stress, and it also ended up fostering distrust and disappointment and anger towards important offices and institutions like the President's office, Congress, the Education Department, and even borrower facing entities like loan servicers and higher education institutions. Knowing that there were repayment plans that included the option for loan forgiveness, like PSLF or the IDR plans, really helped ease anxiety for borrowers in our study that we spoke with, because it provided them an option that helped everything seem manageable. If I could just close by offering two principles that I've learned from borrowers in these studies and the rich body of academic scholarship in this area to guide the work of the committee, I think the first thing I would say is that loan repayment is a longer term process that occurs simultaneously with big and small life changes for borrowers. Having options like PSLF and ICR is an important middle option for those for whom the standard and graduate repayment plans, and the deferment and forbearance options might be insufficient. I would also concur with recommendations to remove interest capitalization wherever possible. (20 seconds) The second thing that I'd share is that more information is better, but it's not enough. The complex processes involved can

lead to frustration and importantly, disengagement. I think automating and simplifying eligibility and verification processes, as well as small changes to messaging, could really go far in addressing the well-documented administrative and behavioral challenges to navigating repayment. Thanks.

MS. ABERNATHY: Thank you. Ashley Osia. If you'll let me know when you're ready.

MS. OSIA: Yes.

MS. ABERNATHY: Okay. Three minutes.

MS. OSIA: Hi. Good afternoon. I am honored to speak today and hope my experience can aid in your discussion. My name is Ashley Osia, and I'm a development director for an environmental nonprofit in Northern California. I have dedicated my career to working in the nonprofit sector, specifically serving 501(C)(3) organizations that focus on preserving our planet and saving endangered species. I want to address the ongoing issues surrounding the Public Service Loan Forgiveness Program, PSLF, which I have been committed to for over a decade. As a first-generation college student, I chose to dedicate my life to public service, often accepting a lower pay to make a positive impact. I was just months away from achieving loan forgiveness when I was forced into forbearance as part of the 8 million

borrowers affected by the Biden Administration's SAVE Plan, which is now pending litigation. This plan had made it more affordable for me to pay my student loan payments on a non-profit salary. I was informed that I could not make payments during this forced forbearance period, and any payments made would not count toward my overall PSLF count. This has left me in a state of uncertainty, continuing my nonprofit work without the financial relief I had anticipated and planned for over a decade. It's incredibly disheartening to be so close to forgiveness after years of commitment, only to have my efforts stalled by bureaucratic challenges and lawsuits.

Additionally, I'm concerned about discussions regarding the definition of what constitutes an approved employer for PSLF. The current criteria states that any 501(c)(3) organization qualifies for forgiveness, providing vital support for those of us who choose to work in this sector. However, the prospect of reevaluating these definitions based on subjective interpretations of legal activities for nonprofits is alarming. As a nonprofit worker dedicated to mitigating climate change and addressing impending sea level rise within our community, I worry that my 501(C)(3) could be unfairly classified as a non-counting entity due to the beliefs of the current administration. The integrity of the PSLF program is

paramount, and it is essential that we uphold the law as it stands to protect all non-profits engaged in critical work for our communities and planet. I urge the Department to consider the real-world impact of these regulatory changes on individuals who have devoted their lives to public service. It is essential to protect and enhance programs like PSLF to ensure that they continue to support those of us who choose (20 seconds) in service of the greater good. Thank you for your time and for the opportunity to share my experience and concerns regarding the PSLF program. I truly appreciate it.

MS. ABERNATHY: Thank you for your comments. Robert Moran? Moran? Robert Moran? If you'll let me know when you're ready.

MR. MORAN: I am ready, thank you.
Thanks, Tamy.

MS. ABERNATHY: Three minutes.

MR. MORAN: Good afternoon. My name is Bob Moran, and I'm speaking today in my role as executive director of the International Education Council. The IEC is a nonprofit association comprised of over 80 colleges and universities located in 14 countries, participating in the Title IV program for the benefit of their degree-seeking American students. Comprehensive foreign school rulemaking was last conducted in 2010, 15 years ago. Much

has changed in the landscape of higher education and its delivery. Therefore, we request the Department consider the following topics: Updating regulations affecting foreign medical schools, specifically those centered on the US medical licensing exam, revising financial auditing and reporting requirements, and reinterpreting contradictory language in the HEA that prevents US students from receiving any of the programmatic coursework in an online fashion. I will briefly speak to each of these. To ensure a level of quality, the HEA requires that foreign medical schools meet a 75% pass rate for all students taking the USMLE. The USMLE is offered in steps, currently step one and step two. When the Department updated the regulations, it applied the 75% threshold to each step, arguably going beyond the law. Foreign medical schools have low numbers of USMLE test takers, and thus one student not passing can have a significant impact on their pass rate. IEC would suggest using the aggregate of all test takers returning to how it was done prior to the last change, and better aligning with the HEA. Members of the IEC are some of the oldest institutions in the world. Many are public and all are subject to strict auditing criteria by their home countries. The HEA requires that foreign school audits be comparable to US standards. In 2020, auditing changes

required that foreign institutions submit an additional supplemental schedule with their annual financial audit. The schedule burdens schools to alter their country's auditing standards to be identical with US auditing standards. In addition, there is a similar burden on institutions with more than 3 million in direct loan volume. Finally, the HEA contains contradictory language on educational delivery. The Department has taken the most restrictive approach by restricting any online delivery for American students pursuing their degrees overseas. Schools around the world are utilizing technological advancements to enrich and supplement their educational offerings, and this interpretation prevents American students from enjoying these enhancements, such as a guest lecturer. Our comment letter will further detail these burdensome and unnecessary regulations that sorely need updating. Title IV aid is provided to allow students to choose where they pursue (20 seconds) -losing the ability of American students to choose some of the finest and oldest institutions in the world would be a shame. The regulatory burden on foreign schools far outweighs the percentage of American students enrolled at that institution. We urge the Department to reexamine these outdated regulations. Thank you for this opportunity and your time.

MS. ABERNATHY: Thank you for your comment. Garry Van Genderen, will you please let me know when you're ready?

DR. VAN GENDEREN: I am ready.

MS. ABERNATHY: Hold on one second. My computer did something crazy. You have three minutes.

DR. VAN GENDEREN: Hi, my name is Dr. Garry Van Genderen. I'm a general dentist in Los Angeles, California, and today I'm representing the Alliance of Independent Dentists. The Alliance of Independent Dentists is a not-for-profit organization representing private practice dentists and dental associates. Dental education in the United States is among the most expensive in the world. It is not uncommon for recent dental graduates to carry over \$500,000 in Federal Student Loan debt, while dental specialists may owe over \$1 million. Negotiated Rulemaking impacts not only future borrowers who might base their career decisions on student loan debt burdens, but also existing borrowers who made the irreversible choices based on repayment plans available to them at the time, such as PAYE and Income Contingent Repayment. These options were instrumental in helping students justify the debt required to attend dental school. Additionally, many borrowers entered Public Service Loan Forgiveness and

went into public service jobs, which offered students loan forgiveness after ten years of service at a government or 501(c)(3) not-for-profit, despite earning significantly lower salaries compared to private practice. These programs were emphasized by dental school financial aid offices, included in assigned master promissory note and supported by both major political parties from George W. Bush signing Public Service Loan Forgiveness into law in 2007 to Barack Obama, establishing pay through Negotiated Rulemaking in 2011. Dentists play a critical role in public health, offering both preventative and emergency care. In times of severe pain, patients depend on dentists for themselves and their family to regain comfort and productivity. If access to programs like ICR, PAYE, and PSLF is changed for current dental professionals or students, many may no longer be able to absorb the financial losses from accepting Medicaid, insurance-reduced fees, or offering pro bono work. This would likely lead to increased out-of-pocket costs for patients, reducing access to care and overcrowding emergency rooms ill-equipped to handle dental crises, straining the entire health care system. We strongly urge the committee to honor the written commitments made to existing Federal Student Loan borrowers. This includes grandfathering current borrowers

into their original repayment programs, ICR, PAYE, PSLF, and reinstating the ICR modified REPAYE. Any changes to these programs should be optional for existing borrowers. Altering terms retroactively undermines the government's credibility and could create broad legal and economic repercussions, impacting trust and- trust and functionality across federal programs. Such regulations would likely fail in court, rendering the committee's efforts ineffective. Thank you for your time.

MS. ABERNATHY: 20 seconds. Perfect timing. Thank you for your comment. Joan Mazlo? I apologize if I massacred that. I'm so sorry.

DR. MAZELIS: That's okay. Thank you so much. It's-

MS. ABERNATHY: You have three minutes.

DR. MAZELIS: Thank you. Thank you for the opportunity to speak with you today. I'm Dr. Joan Maya Mazelis, and I'm an associate professor of sociology at Rutgers University, Camden. I've been researching student loan debt and its consequences for the lives of college graduates with loans for nearly a decade. My work has focused primarily on longitudinal, in-depth interviews with college graduates who took out student loans, who I interviewed as many as seven times over an

eight-year period as they transitioned to their post-college adult lives. If the Department seeks to streamline and improve student aid programs, the best way to accomplish this is to simplify and expand these programs. First, the Department should reduce barriers to access by making it more straightforward for those who qualify to apply for Public Service Loan Forgiveness. Second, the Department should allow all those who need Income Based Repayment plans to enroll in such plans, enabling them to pay off their debt in full, a widely shared aim that most people think is fair. Third, student loans should be interest-free. All of those I interviewed want to pay back their loans, but it's not sustainable to have borrowers pay back more than they borrow. People I interviewed, some of whom worked as nurses during the height of Covid, and others who worked in other public service jobs, struggled to navigate the system to qualify for Public Service Loan Forgiveness. Making it easier for those who deserve access to this program would streamline and improve student aid. Such programs should encourage people to get the necessary training to do difficult and important jobs, like those of frontline healthcare workers. Without access to Public Service Loan Forgiveness, opt instead for higher-paying private sector careers. And if the system isn't fixed, people like them

may not even bother with college in the future. With an aging population needing more healthcare, we need more nurses and others in healthcare, not fewer such workers. I want to highlight the only person in my research who was able to successfully get their loans forgiven. A young woman who worked as a social worker with vulnerable children. Her student debt was forgiven only because she became permanently disabled with brain cancer and then had her loans discharged. She soon passed away. People shouldn't have to die to overcome the crushing debt of student loans. Government used to fund higher education at greater levels, and students could attain a college degree with the use of grants, having reasonable out-of-pocket costs. But things are different now. The cost of college is out of reach for most people. People take out loans to attend college because they want to have a chance at upward mobility and the American dream. They want to pay back their loans, but some have paid for so long they've paid more than they borrowed, and they still owe. College should be accessible to all, and Income Driven Repayment and Public Service Loan Forgiveness is part of what makes that possible. Without it, college would only be (20 seconds) for the wealthy or those who choose the most lucrative careers, and some of the most important jobs would remain vacant. Thank you for your

time, and again, thank you for the opportunity to speak with you today.

MS. ABERNATHY: Thank you for your comment. Barbara Correa, if you will, let me know when you're ready so that I can start the timer?

MS. CORREA: Oh, yeah, I am ready if you can hear me.

MS. ABERNATHY: Yes, ma'am. I can hear you. Three minutes.

MS. CORREA: Hello. I'll just be short and quick. My name is Barbara Correa. I lost my job in the recession in 2008 and decided to get retrained. And so, in my 40s, I went back to school, got my master's and started working for a nonprofit. We develop and manage faculty and staff housing for the University of California, Irvine. I enrolled in the Public Service Loan Forgiveness program at that time in 2017, with the impression that if I made 120 payments, those loans would be forgiven. I have been making payments since then. I'm about three-quarters of the way through that schedule. I received a letter about a week ago from my loan servicer saying that my monthly payment would triple next month, and also laying out a schedule through the 2050s showing that I would be paying \$275,000 by the time I paid this all off, at which time I'd be, I think 82. No mention of

the program, and no mention of the 120 payments that I had agreed to, or any write off. I'm assuming from that letter that the program is in jeopardy. I haven't heard anything about current people who have been in the program and paying into it for years. I don't know where that stands, and I'm very concerned about it. I can absolutely not afford my payments to triple next year. I'm happy to make my monthly payments now. I can afford them now. And like I said, I'm 58 so I was expecting to have to pay another five years or so and then have those loans written off. I have not made a lot of dent in the loans because of- interest has always accrued. And so that's my story.

MS. ABERNATHY: Thank you for your comment.

MS. CORREA: Thank you. Okay.

MS. ABERNATHY: Thank you for your comment.

MS. CORREA: Will, will this be made public at all or? Okay.

MS. ABERNATHY: It is public, Barbara. It was public while you were speaking. So as a matter of fact, it is public, yes.

MS. CORREA: Okay, well. Thank you.

MS. ABERNATHY: Thank you. Stephanie

Novenario?

MS. NOVENARIO: Hello.

MS. ABERNATHY: Hi. You have three minutes.

MS. NOVENARIO: Thank you. Hello, I'm Stephanie Novenario. Over ten years ago, I graduated from law school with over \$200,000 in student loan debt. I turned to PSLF and dedicated my career to public service, and in doing so, I said goodbye to the prestige of working in big law and the high salary that would have accompanied a private career. To put into perspective the types of salaries we're talking about in public service, in 2014, when I graduated from law school, my starting salary as an assistant state attorney prosecuting alleged criminals was \$40,000. Now, ten years later, I work for the Florida Commission on Ethics, and I make \$81,000. And in the coming year, when my third child is born, I will pay \$43,200 per year in daycare costs. That's over half my salary gone to childcare expenses so I can maintain the career I initially took the loans out to obtain. This leaves me \$37,800 per year to contribute to the economy by paying for my monthly mortgage, my car payment, utilities, bills, groceries, health insurance, and any other miscellaneous expenses that are sure to arise when you're low on funds. Under the proposed Income Based

Repayment Assistance Program, of that \$37,800 per year, I would be paying \$6,480 annually in an attempt to pay off my student loans over a 25-year period. I think at that point it would make more sense for me to stop working, and I think it would make more sense for a lot of other people to just stop working, too. I urge you to hear me when I say that the PSLF program is a key reason why public service positions across the United States are filled, and that if PSLF were to be greatly amended or even obliterated, the employees filling those positions would have no other choice but to find higher paying jobs outside of public service. As a side note, my loans should have been forgiven in January of this year, but unfortunately, I'm caught up in the SAVE debacle and have been waiting since July of 2024, nearly one year, for my Income Based Repayment applications to be processed so that I can resume making payments. I've also been waiting since December of 2024, six months, for my buyback request to be processed by Student Aid. Student Aid has provided no timeline for this or for how they are actually calculating the buyback amounts, and many of us are left wondering, are any forms being processed right now? Is buyback a convenient but unrealistic mirage? I believe PSLF is a worthwhile program that pays for itself by enticing young, bright employees to careers in public

service. (20 seconds) Thank you for your time.

MS. ABERNATHY: Thank you for your comments. Karen Cody-Hopkins, if you'll let me know when you're on screen, I'll start the timer.

MS. CODY-HOPKINS: I think I'm on.

MS. ABERNATHY: You are. You have three minutes.

MS. CODY-HOPKINS: Good morning. Excuse me. Good afternoon. My name is Karen Cody-Hopkins. I'm a student loan lawyer in Denver, Colorado. And I'm the vice president of the National Association of Student Loan Lawyers, NASLL. NASLL will be submitting written comments on the three topics listed, especially PSLF and IDR. But I want to focus on your other topic, the potential topics that would streamline. Today I'm going to give you personal comments. I've been doing student loan work since 2006. I cannot tell you the level of panic and confusion I am seeing right now. My phones are ringing off the hook. The Facebook and other online things that I see, people are panicked. Please slow down. Hold off on Negotiated Rulemaking sessions a little bit because the systems had started to repair some of the problems, but then the lawsuits have caused you folks a lot of issues. And I would say, please do not rush to try to fix problems until you fix some of the systematic

things. The cuts in staff, taking away the stakeholder department means we have nobody to call to try to fix problems. The studentaid.gov is so dysfunctional because it's trying to do too many things and doesn't do enough, enough for people. It confuses them. For example, this week you took down the IDR recount tracker. Nobody knows why. Nobody knows what you're doing about it. Nobody understands unless their lawyers, the interplay of the lawsuits and their impacts on what the Department's doing. My first simple request is, please slow down. Please set up some working groups to set up some dialogs between staff and some of the many advocacy groups and lawyers out there who can give you some input into what we're seeing. So often the Department's input has been too limited, and the Negotiated Rulemaking sessions are a very formalistic, necessary process. But I really strongly believe if you had some working group calls, if you had some Zoom sessions with some of the stakeholders, we would be able to- (20 seconds). And I honestly say the other thing is the other audience you have, 13% of the US population has Federal Student Loans. The other people have no clue of the complexity. And I think you also have to do a better job of communicating to the people who don't-

MS. ABERNATHY: Time.

MS. CODY-HOPKINS: Thank you.
Appreciate it.

MS. ABERNATHY: Thank you for your comments. Guinevere Perry? If you'll let me know when you're ready on screen. Are you ready?

MS. PERRY: Yes, I am.

MS. ABERNATHY: You have three minutes.

MS. PERRY: So, I wanted to say that I'm one of the individuals who does the Income Driven Repayment program. And one of the things that I wanted to note is that I'm concerned that when you do the algorithms or you make the equations for how much we have to repay, that it's skewed against individuals who are single, where we're growing number of individuals. We have a higher tax bracket. We have a lot more that we have to contribute to, especially with the economy. And I understand that the way it's currently reviewed is based on whether you're married, you're single, and how many children you have in a household. My thought is, is that maybe that could be reviewed? There are so many other incentives and tax brackets, tax breaks for individuals who are married and with children that it does force single people, it's a constant increase in cost. And I think you would have a lot more people who are able to

make their repayments and stay committed to repaying their loans if that were something that we could consider. So, I mean, I myself volunteer quite a bit in my community and I'm active and I live in Florida right now under Representative Byron Donald's district and I volunteer with the City. I'm on the committee board for active adult in my community. But yeah, I would hope that would be something - you would consider. Is that something that's a rule that's being considered?

MS. ABERNATHY: This venue is for comments only.

MS. PERRY: Okay.

MS. ABERNATHY: Yes, ma'am.

MS. PERRY: I tried to review your policies. Is that something that's published later or is that the comments?

MS. ABERNATHY: This is a public hearing to solicit comments from the- comments, from our public feedback for potential rulemaking. As Mr. Bergeron stated earlier, perhaps you didn't hear it, we are intending to, to send out a notice requesting negotiators- nominees for negotiators sometime in the near future. I would encourage you to continue watching Regulations.gov and look for those- that information and see if that's something that would interest you or get

more information about what the negotiations are. Once we are in that process and we have negotiations and we publish an NPRM, there's also a time for public comment to be written in. And you can also during this time do a written comment and those are looked at as well.

MS. PERRY: Okay. I did also submit a written comment. All right. Well thank you so much.

MS. ABERNATHY: Thank you so much. Sierra Rodriguez, if you'll let me know when you're on screen, I'll start the timer. Sierra?

MS. RODRIGUEZ: Hi, there.

MS. ABERNATHY: Hi. You have three minutes.

MS. RODRIGUEZ: Great. Thank you. My name is Sierra Rodriguez, and I'm here to speak today about a vital component of financial planning for students and graduates, the income contingent repayment plans. As a graduate from American University and a current master's student at the University of Colorado Boulder, I have had to navigate the challenges posed by significant tuition costs. Nationally, tuition and fees at private universities have surged approximately 41% since 2005, adjusted for inflation, according to the US News and World Report. Despite receiving \$10,000 annually scholarships during my undergraduate studies, I myself

have significant outstanding private and Federal Student Loans. As a loan borrower who is planning to pay back every cent, the necessity of ICR plans cannot be overstated. These plans tailor my monthly payment or my monthly federal loan payments to my income, making it feasible to manage my substantial student debt while pursuing further education and contributing to my community. Presently, as funding cuts threatened to erase my education costs further at CU Boulder, ICR plans become even more crucial. Without these plans, my ability to manage my financial obligations would be severely compromised, jeopardizing my financial stability and future. ICR plans are essential for ensuring that graduates like myself, can meet our commitments to repay our education investments without falling into financial ruin. They are more than just financial tools. They are vital lifelines for millions of Americans like myself. Therefore, I strongly advocate for the preservation and expansion of ICR plans. It is critical that we not only maintain these essential programs, but also enhance them to meet the evolving needs of students and graduates, making them more inclusive and accessible as tuition costs continue to rise unchecked. Diminishing the support provided by ICR plans would undermine the efforts of countless students who are committed to repaying their

loans. We must continue to support a practical pathway for loan repayment through robust ICR plans. Thank you for your attention on this issue, and for supporting policies that empower students and graduates to confidently and responsibly invest in their education.

MS. ABERNATHY: Thank you for your comment.

MS. RODRIGUEZ: Thank you.

MS. ABERNATHY: Julia Johnson? If you'll let me know when you're on screen and ready to go.

MS. JOHNSON: I'm here.

MS. ABERNATHY: You have three minutes.

MS. JOHNSON: Hi, my name is Julia Johnson. I am wanting to comment on the Public Service Loan Forgiveness program, just as a personal story and as an advocate for first-generation, income-eligible students in Tennessee. My personal story started with being a first-generation college student. The amount of loans that we had to take out to pursue a college education was a necessity and a need, not something that we took out just to make ends meet or try to grift on. I personally paid back my student loans. I had student loans that were ineligible for PSLF with the updates from the previous administration's Department. I was allowed

to update and consolidate my loans and continue on my PSLF journey. With completing that journey, I continued to advocate for students and make sure they understood the consequences of taking out student loans, but also the benefits to your future education if you use them as a tool for future education and wealth building. I wanted to make sure that all of our students in Tennessee, also in- across the country, know that we have an opportunity to use this, and we are not abusing the system. With possible regulations and rules, wanting to limit who is qualified to receive PSLF as a qualified employer or extending those payments, it does not make sense for the American borrower. We need to make sure that we have streamlined services and accurate information on our websites, and have our students have access to this information as they become adults in this world. We want them to be responsible, but we also want to hold our administration to the same standards we want to hold our borrowers to. Please keep in mind that we are responsible borrowers, and also, we want to make sure that our future is not in the hands of a shifting political climate. We want to make sure these rules are solidified across the board and throughout time. We want to make sure the updates that we're making to these rules are equitable to everyone, but also easy to understand and easy to make

sure we have for the future. So that is my personal story. PSLF works, but also make sure we have the tools and the things that we need to actually make them work for borrowers in the future. We want to make sure they're standardized and equitable across the board. But that's what I wanted to say.

MS. ABERNATHY: Thank you so much for your comment.

MS. JOHNSON: Thank you.

MS. ABERNATHY: Caroline Cress, if you'll let me know when you're on screen, I'll start the timer.

MS. CRESS: Hi there.

MS. ABERNATHY: You have three minutes.

MS. CRESS: Great. Thank you so much for the opportunity to comment today. My name is Caroline Cress, and I am an attorney for a nonprofit organization in North Carolina. For nearly the past decade, I served as a state employee, first as a law clerk and then as an assistant attorney general. I've been pursuing forgiveness through the PSLF program since I graduated law school in 2014, and I've been trying to get out of the SAVE forbearance now since last summer, almost a year. I thought I did everything right. I went to public

schools my whole life, including college and law school. I knew that I wasn't going to law school to make a lot of money. I wanted to serve the public, and so I turned down a partial scholarship from Duke and their law school to take advantage of a full ride I got from a state school. I borrowed only as much as I needed for living expenses and textbooks, \$20,000 a year. I graduated with \$60,000 in federal student debt. And nearly 11 years later, I've never missed a single loan payment. But thanks to interest, I now owe more than \$83,000, over \$23,000 more than I borrowed. This morning, literally, I submitted what theoretically should be my final employment certification for PSLF. I've completed ten full years of public service employment and I, like I said, I've never missed a loan payment. As of today, I should be eligible to have my student debt forgiven. And yet I find myself nowhere near that finish line, thanks to the forced forbearance that I've been in since last summer. I submitted a request to switch into a different repayment program in December of last year, but my loan servicer, MOHELA, still hasn't even begun processing my application from what I can tell. I've spent hours on the phone trying to get an answer and haven't gotten anything. There's really no light at the end of that tunnel. I don't know when I'm going to be able to start making

payments again, so I'm planning to submit a buyback request so that I can undo that damage that's been caused by the SAVE forbearance and my loan servicer's inability to process the IDR application. But I have little faith, honestly, that that will get processed any quicker based on what I'm hearing from colleagues and former classmates that have done the same thing and have been waiting for months to hear back. I'm finding myself now in this endless financial limbo, just as I'm trying to buy a house because I just moved across the country for a new job. My request is simple. Please don't betray people like me who have planned their education and careers around a promise that the Federal Government made to us over a decade ago that if you work hard and you get a degree and you forgo the hefty salary that you could get working in the private sector, and you make all of your payments on time, that after ten years, any remaining student debt will be forgiven. I and many others made huge life decisions (20 seconds) in that promise. In particular, please do not repeal or amend the rule provisions that allow borrowers like me to buy back the months that we've been in SAVE forbearance. Thank you.

MS. ABERNATHY: Thank you for your comment. Dear public, many of you provided comments during both of our hearings, and a lot more have tuned in

to hear people's experiences. On behalf of the Department, we hear you. You shared your experiences with candor, personal stories, stories from associates, stories from the agencies that you represent. And we thank you for joining us. And for those who provided comments, we appreciate you taking the time to share these comments with us. You've given the Department so very much to think about as we consider your feedback and concerns for next steps. We simply appreciate the last two days where we've been able to engage with you on this. I would also like to acknowledge the wonderful team members who have worked tirelessly behind the scenes to make this virtual hearing a success. Of course, we have the conference team, event planners, technical assistance, logistics, our staff, and OPE. On behalf of Deputy Undersecretary and Acting Undersecretary Bergeron, Deputy Assistant Secretary Andre, Karen, Jacob, and myself, we give you a big thank-you to all who coordinated, organized, tested, confirmed, and assisted with the many details required to host this event, for without your efforts today would not have happened and we would not have been able to hear from our public. We appreciate your hard work, dedication that made this event successful. This concludes our virtual hearing. Have a good evening. Thank you very much.