May 5, 2025

U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue SW, 5th Floor
Washington, DC 20202

NATIONAL COLLEGE ATTAINMENT NETWORK

Re: Intent To Receive Public Feedback for the Development of Proposed Regulations and Establish Negotiated Rulemaking Committee

Docket ID: ED-2025-OPE-0016

To Whom It May Concern:

The National College Attainment Network (NCAN) is a nonpartisan, nonprofit membership organization, representing over 500 organizations that provide college access and success services to students across the country. The majority of NCAN members work directly with students and families, helping them pursue and achieve their postsecondary education and career goals.

NCAN appreciates the opportunity to provide feedback on the proposed regulations for the Public Service Loan Forgiveness (PSLF) program. We are concerned about the Trump Administration's plans to restrict access to PSLF by revising employer eligibility requirements, as announced in the Executive Order (EO) entitled "Restoring Public Service Loan Forgiveness," published on March 7th.

This approach to PSLF eligibility is flatly at odds with the authorizing statute, which President George W. Bush signed into law in 2007 to provide an incentive for public service work. The law defines a public service job as:

> "(i) a full-time job in emergency management, government, military service, public safety, law enforcement, public health, public education (including early childhood education), social work in a public child or family service agency, public interest law services (including prosecution or public defense or legal advocacy in low-income communities at a nonprofit organization), public child care, public service for individuals with disabilities, public service for the elderly, public library sciences, school-based library sciences and other school-based services, **or at an organization that is described in section 501(c)(3) of the Internal Revenue Code of 1986 and exempt from taxation under section 501(a) of such Code**".

Furthermore, language on the website of Federal Student Aid affirms the underlying statute stating that "not-for-profit organizations that are tax-exempt under Section 501(c)(3) of the Internal Revenue Code" are eligible employers with no exceptions.

Industries and organizations across the country rely on PSLF to recruit and retain essential employees in hard-to-staff fields and geographic areas, such as teachers, nurses, and first responders. These professionals are among the largest groups that have received loan forgiveness under this program. The long-term investment in PSLF provides dividends to the American economy, encourages skilled workers to enter high-demand jobs and fills critical gaps in our nation's workforce – particularly those in rural areas. As a result of PSLF, children across the country are able to learn from talented teachers, families have gained access to skilled healthcare providers, and neighborhoods are safer.

Access to PSLF is critical for many employees of NCAN members, who are eligible for loan forgiveness as employees of 501(c)(3) college access and success (CAS) organizations. Each day, they provide direct support for students navigating the financial aid application process, exploring opportunities for career development, and ultimately, enrolling in a best-fit postsecondary pathway – whether that is a community college, a high-value credential program, an apprenticeship program, or a bachelor's degree. Their expertise and guidance ensure that students and families make informed decisions about opportunities for education after high school and that students are prepared for success as they matriculate into college or join the workforce upon graduation.

To qualify for PSLF, borrowers must make 10 years of student loan payments while working for an eligible employer. An abrupt change to PSLF requirements would mean that Americans who have invested close to a decade of work as public servants, giving back every day to support the advancement of our country, are left with no path to the loan forgiveness they were promised when they began their careers. Many borrowers participating in PSLF have made significant financial planning decisions supported by their eligibility for loan forgiveness. In removing their access to PSLF, the Administration would fall short of this promise, doing a major disservice to a wide variety of essential workers, and the towns, cities, and states they serve.

Thank you for the opportunity to submit comments on the Public Service Loan Forgiveness program. PSLF provides wide-ranging benefits to American workers and communities across the nation. Any changes that result in restricted access to loan forgiveness for employees of tax-exempt, non-profit organizations, and other public servants, would also limit access to the public services that keep students and families safe, healthy, and on a path to realize their educational and economic dreams.