



May 5, 2025

SUBMITTED VIA REGULATIONS.GOV

Linda McMahon  
Secretary of Education  
U.S. Department of Education  
400 Maryland Ave. SW  
Washington, DC 20202

*Re: Docket Number: ED-2025-OPE-0016; Intent to Receive Public Feedback for the Development of Proposed Regulations and Establish Negotiated Rulemaking Committee*

On behalf of the more than 3 million members of the National Education Association (NEA), we submit the following response to the U.S. Department of Education's (ED) request for comments on the notice of intent to commence negotiated rulemaking.

In 2007, Congress created Public Service Loan Forgiveness (PSLF) to ease the burden of student loan debt for all public service employees, including educators, nurses, service members, charitable non-profit workers, and countless others serving in critical careers. Unfortunately, for years the program's implementation was plagued by mismanagement and servicer malfeasance, denying 98 percent of applications; more than half of the denials were not the applicant's fault. Until recent years, the federal government had fundamentally failed on delivering PSLF's promise of providing loan forgiveness to public servants who had given 10 or more years of service to their communities.

However, changes in recent years have streamlined and simplified the process for borrowers to enroll, verify eligible employment, and make the necessary qualifying monthly payments to receive forgiveness. Since these changes have been implemented it's been clear, PSLF has been a resounding success, changing the lives of the now more than one million public service workers that have already received forgiveness with millions more currently participating in the PSLF program working towards debt forgiveness.

U.S. Department of Education data shows that out of the total number of those that have received PSLF forgiveness, more than 43% are educators.<sup>1</sup> As of December 2024, this program has helped more than 640,000 educators receive forgiveness.<sup>2</sup> These educators have made a real difference by committing their careers to public service and supporting their communities by filling critical roles.

<sup>1</sup> <https://sites.ed.gov/ous/files/2025/01/PSLF-Employers-FINAL-1-16.pdf>

<sup>2</sup> <https://sites.ed.gov/ous/files/2025/01/PSLF-Employers-FINAL-1-16.pdf>

Many of these educators have obtained necessary advanced specialized degrees and entered the education field despite being able to obtain higher salaries in the private sector.

PSLF has strong bipartisan support in Congress, as the program not only helps public service workers that receive forgiveness, but supports the communities that they reside in by ensuring critical roles are staffed and contribute to the local economy. PSLF supports all districts, regardless of political party affiliation or voting trends.

The language created by Congress is clear: PSLF qualifying employers include local, state, or the federal government, but also include employees that work for “*An organization under section 501(c)(3) of the Internal Revenue Code of 1986 that is exempt from taxation under section 501(a) of the Internal Revenue Code.*”<sup>3</sup> Other organizations that provide a public service, like early childhood educators, may also be eligible. We believe that any discussion of limiting PSLF for any 501(c)(3) nonprofit is in direct opposition to both the spirit and the letter of the law authorizing PSLF. Any discussion of changing a nonprofit’s tax-exempt status would fall outside the scope of ED’s negotiated rulemaking authority.

PSLF is a promise made to those that support the communities that they live in, in many cases earning salaries far less than they could in the private sector. We urge ED to appoint a broad array of non-partisan negotiators, including educators and other individuals and organizations that represent PSLF program participants.

We look forward to working with the Department on additional ways to improve access to high quality education. Please do not hesitate to contact me or Samuel Dunietz at [SDunietz@nea.org](mailto:SDunietz@nea.org) should you have any questions.

Sincerely,



Daaiyah Bilal-Threats  
Senior Director, Education Policy and Implementation Center  
National Education Association

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<sup>3</sup> <https://studentaid.gov/help-center/answers/article/what-not-for-profits-eligible-employers-for-pslf>