

August 8, 2022

Mr. Jean-Didier Gaina  
U.S. Department of Education  
400 Maryland Ave. SW  
Room 2C172  
Washington, DC 20202

Submitted via [www.regulations.gov](http://www.regulations.gov)

Re: **Docket Number: ED-2021-OPE-0077-1350**  
Proposed Rulemaking – Student Assistance General Provisions, Federal Perkins Loan Program, Federal Family Education Loan Program, and William D. Ford Federal Direct Loan Program

Dear Mr. Gaina:

The National Council of Nonprofits appreciates this opportunity to submit comments in response to the Department of Education’s Notice of Proposed Rulemaking, Docket Number ED-2021-OPE-0077-1350. Our comments focus almost exclusively on the proposed improvements to the Public Service Loan Forgiveness program (PSLF) regulations identified in Sections 7 (*Public Service Loan Forgiveness*) and 8 (*Improving the PLSF Processes*) of the Notice. See FR 2022-14631 at 14931–14937.

The National Council of Nonprofits is the largest network of nonprofits in North America. We focus on the 97% of charitable nonprofits with budgets under \$5 million – food banks, neighborhood health clinics, community theatres, domestic violence shelters, senior centers, and more – the organizations whose absence would leave huge voids in their communities. Working with our core network of state associations of nonprofits and other collaborative partners, we champion, inform, and connect organizations across the country to get things done for nonprofits and the people and communities they serve.

As a result of this regular engagement with frontline nonprofits throughout the country, the National Council of Nonprofits is well aware of the staffing challenges at charitable nonprofits. We have worked for years to promote awareness of the opportunities in the Public Service Loan Forgiveness (PSLF) program as promised by Congress and to achieve meaningful reforms that will turn that promise into reality. We believe the changes to the PSLF regulations in this Notice of Proposed Rulemaking, if substantially implemented as proposed, would help ease some of the staffing challenges nonprofits are facing by clarifying and expanding the opportunity for loan forgiveness for charitable nonprofit employees, thus fulfilling the purpose behind PSLF as Congress originally intended.

These comments begin by providing background information about the charitable nonprofit workforce for context about the impact and importance of the PSLF and this rulemaking. Next, the comments address the following matters related to the rulemaking and make specific recommendations where warranted:

1. The Department should extend the PSLF Limited Waiver through July 1, 2023, the anticipated effective date of revisions made as a result of this rulemaking.
2. All 501(c)(3) charitable nonprofits should remain as qualifying employers regardless of whether other types of employers or borrowers are deemed qualifying employers.
3. Contractors working with charitable nonprofits should be included as eligible under PSLF.
4. Individuals who work 30 hours per week at qualifying employers should be eligible under PSLF.
5. Additional payments and certain periods of deferment and forbearance should count towards eligible payments under PSLF.
6. Incorporating a reconsideration processes and automation would restore fairness and permit more borrowers to earn forgiveness.
7. The Department should waive the full-time employment criteria during the pandemic.

Finally, these comments conclude with a recommendation for a “Future Payment Credit” Program for student debt cancellation that could provide avenues for qualifying payments to PSLF and remove burdens on borrowers.

### **Background About the Charitable Nonprofit Workforce**

The William D. Ford Federal Direct Loan Program expressly defines public services jobs to include full-time jobs at 501(c)(3) organizations, generally referred to as charitable nonprofits.<sup>1</sup> Nationwide and in every community in America, charitable nonprofits provide vital services to the public and contribute significantly to the economy, employing more people than the construction, finance, and manufacturing industries.<sup>2</sup> Prior to the pandemic, nonprofits employed more than 12.3 million workers – 10% of America’s private workforce. During the health and economic crisis caused by COVID-19, tens of millions more Americans than usual turned to charitable organizations for help – and nonprofits delivered. Yet resources declined for tens of thousands of charitable nonprofits, resulting in the loss of more than 450,000 nonprofit jobs.<sup>3</sup>

While complete employment data are not available due to shortcomings in federal workplace data regarding charitable nonprofits, it is indisputable that many workers dedicated to public service were forced out of their jobs due to the pandemic and economic crises. But for the PSLF Temporary Waiver and other supports during the pandemic, hundreds of thousands, and perhaps millions of

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<sup>1</sup> See [20 U.S.C. Sec. 1087e\(M\)\(3\)\(B\)\(i\)](#).

<sup>2</sup> [The 2019 Nonprofit Employment Report](#), Johns Hopkins Center for Civil Society Studies, based on 2016 data from U.S. Bureau of Labor Statistics.

<sup>3</sup> [COVID-19 Jobs Update December 2021](#), Johns Hopkins University Center for Civil Society Studies, Jan. 11, 2022.

borrowers employed by charitable organizations would be in default and ineligible for relief. Therefore, the substance and outcome of this rulemaking process is of vital importance to (i) student-loan borrowers, (ii) the charitable nonprofit employers that rely on them to advance their missions, and (iii) people across America who depend on charitable organizations to provide food, health care, shelter, child care, workforce development, and so much more.

### **The Nonprofit Workforce Shortage Crisis**

The proposed regulations could help alleviate the significant nonprofit workforce shortages crises throughout the country that is limiting many nonprofits from delivering the volume of services sought by the public. As documented at the end of 2021, charitable nonprofits from across the country and all subsectors have been experiencing significantly higher job vacancy rates.<sup>4</sup> Three out of four nonprofits (76%), with missions ranging from health and human services to arts, culture, and education, reported job vacancies of greater than 10%. An astonishing 42% had a fifth (20%) or more of their positions open. Organizations without adequate levels of personnel obviously cannot deliver the same volume of services, much less respond to growing demands. A key cause of job vacancies is salary competition from for-profit and government employers poaching nonprofit employees. Additionally, nonprofit employees must deal with burnout from the relentless pressure to deliver higher volumes of services without much relief since the pandemic began almost two and a half years ago.

The shortage of workers in all sectors is a matter of common knowledge. But the significance of the crisis affecting the work of charitable nonprofits – which often involves human lives and well-being – is different. The loss of nonprofit jobs means people suffer because nonprofits cannot deliver services the public needs.

The National Council of Nonprofits has long celebrated the fact that the PSLF helps charitable organizations attract talent, incentivizes employees to remain in the nonprofit sector, and provides relief for public service professionals who are often paid less than other employment opportunities. Access to student debt relief during career decision-making provides potential hires additional incentives to work at mission-oriented nonprofits despite possible higher financial enticements elsewhere, particularly in the for-profit sector. PSLF helps close the financial gap between the charitable nonprofit and for-profit sectors and allows charitable organizations to compete for top talent rather than be portrayed as employers of last resort. The promise to receive full forgiveness after ten years in the charitable nonprofit sector creates an incentive for workers to remain in the sector regardless of potential recruitment for higher wages elsewhere. A greater likelihood of loan forgiveness can be the deciding factor that helps someone overcome high levels of burnout or other inducements to abandon the sector and public service.

The Public Service Loan Forgiveness program and its impact on nonprofits and their employees has been an area of great interest to our nationwide network. Charitable nonprofits, in particular, have a vested interest in a strong, effective, and efficient PSLF program as 501(c)(3) charitable nonprofit employers make up the largest portion of qualifying employers expressly approved under the forgiveness program next to government employers. As stated, charitable nonprofits are facing a workforce shortage, and federal programs like PSLF help fill the gap to attract and retain qualified

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<sup>4</sup> [The Scope and Impact of Nonprofit Workforce Shortages](#), National Council of Nonprofits, Dec. 13, 2021.

employees to perform necessary work and provide desperately needed services within their communities.

As a final introductory matter, we note that an effective and accessible PSLF program is in the public interest because it can reduce financial stress for workers resulting from student debt while encouraging them to perform meaningful work with mission-driven charitable organizations. Nonprofit professionals depending on PSLF have committed to serving their communities for at least ten years. During this tenure, financial strain can cause nonprofit workers to question whether the typically lower salaries are worth staying at a job and mission in which they are committed. The promise of debt relief in ten years (or less years, depending on how long they've worked) allows people to make life decisions – getting married, having children, buying a house – that they otherwise would forestall. Conversely, knowing that daunting student loan debt will haunt for the next 20 or more years acts like an anchor pulling people out of the economy.

A recent study by AIG Retirement Services found that 66% of public service employees cite student loans and payments as the top cause of financial stress and 42% of respondents “describe their financial stress level as moderate or high.”<sup>5</sup> However, the promise of loan forgiveness after ten years allows those same workers to remain dedicated to their jobs without the same financial fears. The AIG study concludes, “Debt forgiveness can relieve stress, which can reduce absenteeism, improve productivity, strengthen talent retention, and yield meaningful savings for employers.” Ultimately, the communities served by those nonprofit workers receive both the direct and indirect benefits of committed nonprofit workers not distracted by the burdens of student debt.

### **Comments on Proposed Regulations Governing the PSLF Program**

As the forgoing observations indicate, the National Council of Nonprofits is fully committed to working with the Department of Education and all interested parties to improve the PSLF program so that it can fulfill the promises made by Congress in 2007 on which so many employees have relied. We offer the following comments on the proposed rulemaking.

#### **1. The Department should extend the PSLF Limited Waiver through July 1, 2023.**

As an initial matter, the National Council of Nonprofits strongly recommends the extension of the PSLF Limited Waiver beyond the current expiration date of October 31, 2022, until the effective date of the regulatory revisions promulgated through this rulemaking. A lapse in the terms of the Limited Waiver would result in a reversion to the old, demonstrably flawed regulations for a period of several months, creating administrative burdens for the Department and administrators, and unnecessary confusion and unfairness for borrowers and employers alike.

Plus, additional time is needed to alert and convince eligible people to apply. Past turmoil, bureaucratic barriers, dismally low approvals for forgiveness, and other frustrations surrounding the program have engendered distrust that is taking time to overcome. Extension of the PSLF Limited Waiver is essential to righting the perceptions and proper functioning of the program.

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<sup>5</sup> [Student Loan Debt and Public Service Employees](#), AIG Retirement Services, 2021.

**2. All 501(c)(3) charitable nonprofits should continue to be deemed qualifying employers regardless of whether other types of employers or borrowers are included.**

The National Council of Nonprofits strongly recommends that the federal government should continue to treat all charitable nonprofit organizations as eligible employers under the PSLF regardless of any changes to the rules governing who shall be considered eligible borrowers for forgiveness under the program. We ask that the Department expressly state this point in the final rule to avoid confusion or interpretations not in alignment with Department intent.

The Notice of Proposed Rulemaking states, “The Department also proposes to continue using the employer approach for all employees of an organization. If the Department relied on individual job descriptions, it is likely that many support staff who provide services to the organization rather than to its clients would not qualify even though their services are vital to keeping the organization itself in operation.”<sup>6</sup> We emphatically agree. To do otherwise would discriminate against people based on job titles and descriptions that can be erratic and misleading within organizations, let alone between organizations. The purpose of PSLF is to encourage work in public service without restriction on the jobs being performed. Limitations under the proposed regulations would run counter to why the program was created.

To reinforce the Department’s view, federal law defines charitable nonprofits, under Internal Revenue Code Sec. 501(c)(3), as being “organized and operated exclusively” for charitable purposes, which are detailed elsewhere in the Code as being performed in service of the public. All employees of 501(c)(3) charitable nonprofits working towards advancing their organization’s mission, regardless of their roles – whether in management, direct services, data research, janitorial services, animal welfare, spiritual enlightenment, technical assistance, logistics, or more – are providing essential support for their clients and community. Direct services with client-facing roles represent only a portion of nonprofit workers. Any limitations on roles or job descriptions of charitable nonprofit employees would devalue the contributions of dedicated employees and greatly reduce the eligibility of borrowers for PSLF.

**3. Contractors working with charitable nonprofits should be included as eligible under PSLF.**

The National Council of Nonprofits supports the proposed clarifying change to extend PSLF eligibility to borrowers who are working with qualifying charitable nonprofits either directly as an independent contractor or as an employee of an organization that has a contract with the charitable nonprofits. Nonprofits are creative problem-solvers for their communities and provide child care, education, public health, library, elderly services, and many more forms of assistance. Many charitable nonprofits have long-term relationships with independent contractors who are equally dedicated to the organizations’ missions of public service. Nonprofits may also retain and manage staff who are paid by a third-party organization. Despite not being on the payroll of the 501(c)(3) charitable nonprofit, they often perform the same roles and functions as an employee.

In implementing this proposed change, the Department should clearly state that 501(c)(3) charitable nonprofit employers are permitted to certify the hours of nonemployee independent contractors for the purposes of PSLF. We ask that the Department provide clear, simple instructions for 501(c)(3)

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<sup>6</sup> Notice of Proposed Rulemaking, 87 Federal Register 133, Jul. 13, 2022, at 41934.

employers if they are required to certify whether a contractor qualifies for forgiveness under PSLF. We believe it would be sufficient for the Department to adopt a form similar to the current certification form used for PSLF that indicates the minimum number of hours worked per week and certifies that the job performed is in advancement of the organization's charitable mission.

We recommend against the Department imposing additional requirements of explaining any disparities of pay, educational attainment, job function, or job site location. We make this recommendation on the grounds that such requirements would run counter to the purpose of PSLF of incentivizing workers to work in public service. Complex reporting requirements would be an undue burden on charitable nonprofits and may discourage them from certifying otherwise deserving and eligible borrowers.

#### **4. Individuals who work 30 hours per week at one or more qualifying employers should be eligible under PSLF.**

The current definition of "full-time" in the regulations – applying either the employer's definition of full-time or at least 30 hours per week, whichever is greater – leaves out a large percentage of otherwise eligible workers earning forgiveness under PSLF. The proposed rule calls for expanding the definition of "full-time" to include three additional employment scenarios whereby a worker could earn eligibility:

- 1) work at one or more jobs for at least an average of 30 hours per week,
- 2) work 30 hours per week during a contractual or employment period, or
- 3) work the equivalent of 30 hours per week determined by a formula in non-tenure track employment at an institution of higher education.

We agree that clarifying that full-time includes any employment at a charitable nonprofit for at least 30 hours per week would provide certainty, reduce paperwork, and eliminate the need for clarification by payroll companies and HR professionals for borrowers.

Charitable nonprofits often hire part-time and contract employees and define full-time as 40 hours per week. It is not uncommon for nonprofits that define full-time as 40 hours per week to have shortened weeks, hours, or "summer Fridays" where the average hours worked are less than 40 hours per week for employees. Other nonprofits may only have the ability to hire an employee for 35 hours per week due to budget constraints, and yet define full-time as 40 hours per week in their employment policies. This employee would be ineligible under PSLF. Comparatively, someone else may work two part-time jobs at 15 hours per week each and yet would still qualify for forgiveness under the current rules despite working less hours (30 hours compared to 35 hours). The discrepancy between the required hours worked is patently unfair and should be rectified by the proposed rulemaking's proposal for full time to be defined as 30 hours per week.

The National Council of Nonprofits endorses these changes and recommend their inclusion in the final regulations. Borrowers who are otherwise eligible under PSLF should be permitted to qualify by working 30 hours per week. The change would give greater certainty, simplicity, and clarity for borrowers working between 30 and 40 hours per week, working for multiple eligible employers, or on a contractual basis or for public service employers partnering with 501(c)(3) charitable nonprofits.

#### **5. Additional payments and certain periods of deferment and forbearance should count towards eligible payments under PSLF.**

Many workers have been making payments toward forgiveness during their employment at charitable nonprofits despite often lower salaries and wages (as discussed previously), which cuts into their individual monthly budgets. However, some of those payments have not been counted toward fulfillment of PSLF requirements under previous regulatory guidelines. Under the current statute and regulations, certain payments do not count towards PSLF qualifying payments. In particular, full payments made outside of a 15-day payment window, including early payments or automatic payments, may be ineligible as qualifying payments for the purposes of PSLF.

The National Council of Nonprofits supports the proposal to revise Sec. 685.219(c)(1)(iii) to include more payments, including early payments, late payments, lump sum, and advance payments, so that borrowers have more ways to have payments count toward forgiveness. Going further, we recommend that the Department allow any prior period of repayment to count as a qualifying payment, regardless of federal loan type, repayment plan, or whether payments were made in full or on time. Parent PLUS loan holders and couples who have previously jointly-consolidated their FFEL loans should be permitted to re-consolidate them into one Direct Loan for PSLF eligibility. This would increase the number of current workers who can earn forgiveness in the near term to allow for financial freedom from student debt.

The proposed rulemaking would also allow for certain periods of deferment or forbearance to count towards forgiveness and would allow for a hold-harmless period for borrowers who were working for a qualifying employer during periods of deferment or forbearance. Some borrowers, particularly those working at some lower-paying nonprofits, were *automatically* placed into deferment or forbearance due to circumstances despite not choosing to do so. Nonprofit workers may have qualified for payments as low as \$0 per month but were instead put into deferment or forbearance because they did not know of the very low payment option, received poor advice by loan services, or had their status adjusted automatically by administrators. Allowing for this period to be counted towards forgiveness or permitting borrowers to pay back monthly payments via a lump sum payment for prior periods would provide fairness for borrowers and permit some borrowers to earn forgiveness based on the actual amount of time working for a charitable nonprofit. Additionally, it rights a wrong for those who may have been receiving inaccurate advice or denied proper guidance based on their financial circumstances.

#### **6. Incorporating a reconsideration processes and automation would restore fairness and permit more borrowers to earn forgiveness.**

The proposed rulemaking would create a reconsideration process where a borrower may request reconsideration for denied applications or previous payments that were not counted towards forgiveness. The National Council of Nonprofits supports the proposed reconsideration process and automation that would streamline forgiveness, reduce burdens on borrowers and government, and clarify expectations. Given the confusing and sometimes tortuous history of PSLF administration and enforcement, this approach is both fair and necessary.

## 7. The Department should waive the full-time employment criteria during the pandemic.

As stated in the introduction, prior to the pandemic, nonprofits employed more than 12.3 million workers – 10% of America’s private workforce. During the pandemic, tens of millions more Americans than usual turned to charitable organizations for help – and nonprofits delivered. Yet resources declined for tens of thousands of nonprofits, resulting in the loss of more than 450,000 nonprofit jobs as of December 2021. As the pandemic continues, employment numbers at nonprofits have not recovered the same as other sectors of the workforce.

The National Council of Nonprofits strongly recommends that the Department of Education waive the full-time employment criteria during the pandemic. While borrowers were automatically placed into forbearance with 0% interest rates through August 31, 2022, and the time in forbearance is considered counting as payments towards the minimum requirements for forgiveness, the borrower must have maintained full-time employment at a qualifying employer. This was an unrealistic obligation during the worst public health crisis in 100 years. Many nonprofits had to lay off workers due to the pandemic at no fault of the worker. While laid off from work, these nonprofit workers who were seeking to earn their forgiveness under PSLF became ineligible for the benefit of the forbearance counting as payments for forgiveness. They lost valuable time in their 10-year requirement while unemployed, often despite a strong desire to remain employed and serve their communities. As nonprofits were able to rehire, many made a point of bringing back previously laid-off staff. However, the workforce shortage crisis in the nonprofit sector, along with fundraising challenges, forced many employers to reduce their hours of operation or the number of hours their employees can provide services. Those nonprofit workers should not now be penalized. A tolling of the full-time work requirement during the pandemic would be consistent with the statute and regulations, and a matter of fundamental fairness.

## Comments on Potential Student Loan Cancellation Strategies

### Student debt cancellation should provide avenues for qualifying payments to PSLF through a “Future Payment Credit” Program.

Student debt cancellation remains a top priority for many borrowers. One possible student debt cancellation concept that has been reported, but not announced formally, has been executive action to cancel \$10,000 for each individual borrower. The National Council of Nonprofits does not take a position on student debt cancellation. However, should the Administration choose to cancel student debt in the form of a single lump sum payment for each individual borrower like the \$10,000 proposal, the National Council of Nonprofits recommends using a Future Payment Credit program to maximize the impact and reach of the student debt cancellation, particularly for those borrowers who qualify for PSLF.

For the purposes of explaining the concept behind the recommended Future Payment Credit program, we will use the \$10,000 as the amount; however, the program could apply to any lump-sum payment amount. On average, individuals with student loan debt each owe approximately \$40,000,<sup>7</sup> an amount that increases to nearly \$45,000 for Black borrowers.<sup>8</sup> As of 2021, the

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<sup>7</sup> [Average Student Loan Payment](#), Education Data Initiative, Mar. 1, 2022.

<sup>8</sup> [The average student loan debt by household income, school type, and race](#), *Business Insider*, Liz Knueven and Ryan Wangman, June 3, 2022.



average income for those 25 years old was \$41,461, which increased to \$66,320 for 35-year-olds.<sup>9</sup> For these individuals, a flat \$10,000 cancellation towards a balance of \$40,000 would save each approximately \$68 - \$81 per month (\$272 per month for 25-year-olds and \$326 per month for 35-year-olds, reduced to \$204 and \$245 per month, respectively, under ICR), according to the [www.studentaid.gov](http://www.studentaid.gov) calculator. While these savings would provide long-term relief to many, we believe an alternate option could provide greater relief to a considerable number of borrowers, particularly during this challenging economic climate.

Rather than providing a lump sum cancellation of \$10,000 to every borrower, a Future Payment Credit program would allow borrowers to choose between two options: (A) a lump-sum payment for debt cancellation up to \$10,000 or (B) a \$10,000 “future payment credit” to their student loan accounts to be applied to monthly loan payments, up to the amount owed monthly by the borrower. If the debt is forgiven under PSLF or completely paid off prior to exhaustion of the \$10,000 future payment credit, the remainder of the funds would be returned to the Treasury, thus reducing the overall cost of the program. Based on the average payment of \$326, the future payment credit option would satisfy just over 30 months, or 2.5 years, of payments (essentially doubling the period of relief given by the COVID-19 student loan pause). Notably, any payments made with the future payment credit would count towards PSLF, so long as the individual met all other PSLF requirements.

For example, take Average Borrower who owes \$40,000 in student debt and has worked for a qualifying employer under PSLF for 8 years. Average Borrower must make 24 more qualifying payments to have their debt forgiven under PSLF. Under Option A lump sum payment, Average Borrower would have to make another 24 qualifying payments, although at \$81 less per month. However, under Option B, Average Borrower would apply the future payment credit to satisfy the remaining monthly payments, still receive forgiveness under PSLF for the outstanding balance after 24 months, and only use \$7,824 of the credited \$10,000, thus saving the Treasury \$2,176 of allocated funds for debt cancellation.

The borrower’s decision of which option to choose would vary depending on the amount owed and the repayment plan. Borrowers with high levels of debt in certain repayment plans have monthly payments that do not even cover interest (even if certain interest amortization is curtailed under the proposed rulemaking), creating a situation where their debt continues to accumulate. In this case, a \$10,000 lump sum debt cancellation would not make an impact on their overall debt. However, as shown in the example above, they would have a better path to forgiveness under PSLF using future payment credits. Separately, a borrower with \$11,000 in debt could opt for the lump sum, which would make an enormous impact.

### ***Benefits of Permitting Borrowers to Receive Future Payment Credits***

The Future Payment Credit program has been modeled after the federal student loan relief during the pandemic, which improved the credit standing of almost 26 million borrowers.<sup>10</sup> Use of the envisioned program would enable borrowers to extend non-payments for up to several years and allow them to receive the same kind of relief they are currently receiving under the COVID forbearance period. Further, no additional cost to the Treasury would be ensued, compared to a

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<sup>9</sup> [Average Salary by Age plus Median, Top 1%, and All Salary Percentiles](#), DQYDJ, 2022.

<sup>10</sup> [Study on Impact of Student Loan Pause](#), *Inside Higher Ed*, Scott Jaschick, Mar. 23, 2022.

lump sum proposal for student debt cancellation, and could possibly save federal money allocated for debt cancellation compared to a lump sum proposal.

A Future Payment Credit program, if implemented well, would simplify payments for borrowers, thus reducing the chance or risk of default and offset interest rate increases. Most importantly for PSLF purposes, it would allow nonprofit and other public service workers to make qualifying payments for PSLF using the debt cancellation money and therefore possibly reach forgiveness under the program.

#### ***Challenges of Permitting Borrowers to Receive Debt Cancellation Payments***

The main challenge of a Future Payment Credit program could be possibly complex implementation for the Department of Education and loan service providers. However, this could be remedied by incorporating an additional button to choose the Future Payment Credit program on the student borrower portal. The Department of Education could allot the lump sum amount of debt cancellation (i.e., \$10,000) to each individual account. Each month the individual borrower could make their monthly payment from the lump sum amount by clicking on Future Payment Credit button whereby the monthly payment would be debited from the lump sum allotment. If a borrower earns forgiveness before all of their individual allotment is used, the remainder would automatically be returned to the Treasury. If the borrower uses the full amount of the lump sum allotment, the Future Payment Credit would indicate a \$0 balance.

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Thank you for following through on addressing challenges with student loans in general, and the PSLF in particular, by undertaking this proposed rulemaking. As the largest network of charitable nonprofits, we stand ready to work with the Department to preserve, support, and strengthen the Public Service Loan Forgiveness program. Please let us know if you have any questions.

Sincerely,



Tiffany Gourley Carter  
Policy Counsel  
National Council of Nonprofits  
[tcarter@councilofnonprofits.org](mailto:tcarter@councilofnonprofits.org)



Jessica Mendieta  
Policy Associate  
National Council of Nonprofits  
[jmendieta@councilofnonprofits.org](mailto:jmendieta@councilofnonprofits.org)