

May 17, 2024

U.S. Department of Education
400 Maryland Avenue SW
Washington, DC, 20202

Re: Docket ID ED–2023–OPE–0123

Dear Secretary Cardona,

We the undersigned 229 organizations representing millions of students, borrowers, workers, people of color, veterans, people with disabilities, and consumers crushed under the weight of the student loan debt crisis submit this comment in response to the U.S. Department of Education’s (the Department) Notice of Proposed Rulemaking (NPRM), published to the [Federal Register on April 17, 2024](#) to provide student loan debt relief to millions of Americans using available authorities under the Higher Education Act (HEA).

We applaud the Department's ongoing commitment to delivering on President Biden’s promise of sweeping student loan debt relief. For too long, the student loan debt crisis has inhibited [homeownership](#), hindered [retirement savings](#), stifled [small business formation](#), exacerbated racial and economic inequities and [widened the racial wealth gap](#), worsened economic insecurity for the most vulnerable borrowers, including [seniors](#) and [people with disabilities](#) and worsened [health disparities and the mental health crisis](#). When President Biden was elected, millions of Americans urged him to tackle the student debt crisis as the intergenerational, racial, gender and economic justice issue that it is and we have been proud to see President Biden answer these calls and continue the fight to deliver the relief he has promised. Over the last three years, the Biden Administration has made history delivering an unprecedented [\\$160 billion in student loan debt relief to more than 4.5 million student loan borrowers](#) by ensuring that borrowers are finally able to get the relief they have been entitled to under federal law.

While the relief delivered thus far has been monumental, tens of millions of borrowers were robbed of sweeping relief when the conservative majority of the Supreme Court [struck down](#) President Biden’s original debt relief program. The Biden Administration’s proposed NPRM represents a glimmer of hope for these millions of borrowers and their families that have been forced to wait for nearly two years for much-needed relief. **Therefore, it is critical that the Department move swiftly and urgently to finalize and implement these rules and deploy necessary relief to the estimated [30 million working Americans](#) who will benefit from them.**

We applaud the Department for proposing a thorough array of regulations that could provide **automatic** relief to tens of millions of borrowers and urge the Administration to consider the following recommendations to strengthen the proposed NPRM and ensure the final rules are as generous as possible.

- **Address run away interest for all borrowers by eliminating the arbitrary income caps for borrowers on an Income Driven Repayment (IDR) plan, eliminating or drastically increasing the \$20,000 cap on interest relief for all other eligible borrowers, and providing borrowers cancellation of underlying balances.** We applaud the Administration’s effort to eliminate runaway interest but worry the current proposal will unfairly exclude borrowers who also desperately need relief—especially Black and brown borrowers in particular, who due to the lack of generational wealth accumulation and ongoing wage discrimination have had to borrow more for college and are more likely to struggle in repayment.
- **Extend automatic relief for borrowers with loans older than 20/25 years on a rolling basis to avoid a “cliff effect” that will unfairly leave millions of borrowers behind who may have missed this time frame by a mere month.** Doing so would build on the improvements the Department has made to the student loan repayment system and set a critical backstop to the efforts under the IDR Account Adjustment.
- **Provide relief to borrowers who are victims of servicing errors and abuse.** While the Biden Administration has held MOHELA, Maximus and other servicers accountable by withholding payments and requiring servicers to place affected borrowers into short administrative forbearance while errors are fixed, the Administration can and must do more by providing additional pathways to cancel student debt for victims of servicer error.
- **Immediately unveil proposed NPRM related to supporting borrowers experiencing hardship.** We applaud the Department for coming back to the negotiating table to develop a hardship proposal and urge the Administration to also prioritize relief for these borrowers.

Last summer, President Biden stood before the American people and reaffirmed his commitment to deliver student debt relief to millions of working families by utilizing every legal tool available. The proposed NPRM presents a monumental opportunity to ensure this relief becomes a reality for 30 million Americans and their families. It is critical that the Department work with the utmost urgency to ensure that this package of rules is finalized and implemented as swiftly and efficiently as possible. Millions of borrowers and their families have waited long enough.

We stand ready to work in partnership with the Biden Administration to push this relief across the finish line.

Sincerely,

National Organizations

A. Phillip Randolph Institute
Affordable Homeownership Foundation Inc
AFGE Local 252
AFL-CIO
AFT
Amazon Labor Union
American Association of University Professors
American Association of University Women (AAUW)
American Federation of State, County and Municipal Employees (AFSCME)
Autistic Women & Nonbinary Network
Blue Future
Center for American Progress
Center for Law and Social Policy
Center for Responsible Lending
Clearinghouse on Women's Issues
Coalition on Human Needs
Consumer Federation of America
Consumers for Auto Reliability and Safety
Council on Social Work Education
CWA
Dream Defenders
EdTrust
Equity Research Cooperative (EqRC)
Faith in Action Network
Formerly Incarcerated College Graduates Network
Fosterus
Generation Hope
Hispanic Federation
Houston Federation of Teachers
Independent Staff Union (staff of NTEU)
Indivisible
International Federation of Professional and Technical Engineers (IFPTE)

Labor Council for Latin American Advancement
MDC
Minority Veterans of America
MomsRising
MoveOn
MPower Change Action Fund
NAACP
National Action Network
National Association of Consumer Bankruptcy Attorneys (NACBA)
National Association of Secondary School Principals (NASSP)
National Association of Social Workers
National Association of Student Loan Lawyers
National Black Gay Men's Advocacy Coalition
National Black Justice Coalition
National Center for Law and Economic Justice
National Coalition for the Homeless, Bring America Home NOW Campaign
National Consumers League
National Council of Asian Pacific Americans (NCAPA)
National Disability Institute
National Education Association
National Nurses United
National Organization for Women Foundation
National Young Farmers Coalition
Opportunity Youth United
Our Revolution
Our Turn
People Power United
Presente.org
Public Citizen
Public Counsel
Public Good Law Center
Rise
RootsAction.org
Rural Coalition
Secular Student Alliance
Service Employees International Union (SEIU)
Social Security Works
Student Borrower Protection Center
Student Debt Crisis Center

Supermajority
The Autistic People of Color Fund
The Debt Collective
The Hope Center at Temple University
The Leadership Conference on Civil and Human Rights
The Restaurant Opportunities Center United (ROC United)
uAspire
UnidosUS
United Auto Workers
We the 45 Million
Women Advancing Nutrition Dietetics and Agriculture (WANDA)
Young Invincibles

State Organizations

AFGE Local 704
AFT Washington
AKPIRG
Alabama State Association of Cooperatives
American Federation of Teachers - New Mexico
ARISE
Arizona Students' Association
CAMEO Network
CASH Campaign of Maryland
CFT - A Union of Educators and Classified Professionals
Church Women United in New York State
Colorado Fiscal Institute
Community Legal Aid Society, Inc. (Delaware)
Community Service Society of New York
E5 Enterprise
Economic Action Maryland
Generation Up
Georgia Budget and Policy Institute
GRACE - End Child Poverty CA
Hawaii State Teachers Association
HFT
Labor Network for Sustainability
Maine Center for Economic Policy
Maine Education Association

Maryland Center for Collegiate Financial Wellness
Mountain State Justice, Inc.
National Association of Social Workers, Ohio Chapter
National Council of Jewish Women-PA
New Era Colorado
New Hampshire Youth Movement
New Jersey Association of Mental Health and Addiction Agencies, Inc.
New Jersey Citizen Action
New Jersey Institute for Social Justice
New Mexico Center on Law and Poverty
NextGen California
NTS Group, CEA, EOF, USCAN, CO Dem. Party - Energy & Environ. Initiative, Super Cap
LLC
Ohio Student Association
Oregon Student Association
Passengers United
Progress Virginia
Progressive Leadership Alliance of Nevada
Public Justice Center
Quiet Creek Herb Farm & School of Country Living
RAISE Texas
Rural Advancement Fund of the National Sharecroppers Fund, Inc.
SEIU Local 500
South Carolina Legal Justice Center
Student Loan Fund
Students United
The Collaborative of NC
The Freedom BLOC
THE ONE LESS FOUNDATION
Towards Justice
UC-AFT Local 1474
United Campus Workers Arizona, CWA Local 7065
United University Professions
United Vision for Idaho
Vermont-NEA
Virginia Poverty Law Center
Washington Education Association
Wisconsin Education Association Council
Women Employed

WV Citizen Action

National Association of Social Workers DC Metro Chapter
National Association of Social Workers, Alabama Chapter
National Association of Social Workers, Alaska Chapter
National Association of Social Workers, Arizona Chapter
National Association of Social Workers, Arkansas Chapter
National Association of Social Workers, California Chapter
National Association of Social Workers, Colorado Chapter
National Association of Social Workers, Connecticut Chapter
National Association of Social Workers, Delaware Chapter
National Association of Social Workers, Florida Chapter
National Association of Social Workers, Georgia Chapter
National Association of Social Workers, Guam Chapter
National Association of Social Workers, Hawaii Chapter
National Association of Social Workers, Idaho Chapter
National Association of Social Workers, Illinois Chapter
National Association of Social Workers, Indiana Chapter
National Association of Social Workers, Iowa Chapter
National Association of Social Workers, Kansas Chapter
National Association of Social Workers, Kentucky Chapter
National Association of Social Workers, Louisiana Chapter
National Association of Social Workers, Maine Chapter
National Association of Social Workers, Maryland Chapter
National Association of Social Workers, Massachusetts Chapter
National Association of Social Workers, Michigan Chapter
National Association of Social Workers, Minnesota Chapter
National Association of Social Workers, Mississippi Chapter
National Association of Social Workers, Missouri Chapter
National Association of Social Workers, Montana Chapter
National Association of Social Workers, Nebraska Chapter
National Association of Social Workers, Nevada Chapter
National Association of Social Workers, New Hampshire Chapter
National Association of Social Workers, New Jersey Chapter
National Association of Social Workers, New Mexico Chapter
National Association of Social Workers, New York City Chapter
National Association of Social Workers, New York State Chapter
National Association of Social Workers, North Carolina Chapter
National Association of Social Workers, North Dakota Chapter
National Association of Social Workers, Oklahoma Chapter

National Association of Social Workers, Oregon Chapter
National Association of Social Workers, Pennsylvania Chapter
National Association of Social Workers, Puerto Rico Chapter
National Association of Social Workers, Rhode Island Chapter
National Association of Social Workers, South Carolina Chapter
National Association of Social Workers, South Dakota Chapter
National Association of Social Workers, Tennessee Chapter
National Association of Social Workers, Texas Chapter
National Association of Social Workers, Utah Chapter
National Association of Social Workers, Vermont Chapter
National Association of Social Workers, Virgin Islands Chapter
National Association of Social Workers, Virginia Chapter
National Association of Social Workers, Washington Chapter
National Association of Social Workers, West Virginia Chapter
National Association of Social Workers, Wisconsin Chapter
National Association of Social Workers, Wyoming Chapter

Local Organizations

Action Together NEPA
AFT Local 604
Albuquerque Teachers Federation
Alief American Federation of Teachers and School Employees
Association of Legal Aid Attorneys (UAW Local 2325)
Bastrop Federation of Teachers
Civil Service Bar Association
Colchester Federation of Teachers Local 1807
College Now Greater Cleveland
Fayetteville Police Accountability Community Taskforce
Graduate and Professional Student Council, University of Arizona
Hartford Federation of Teachers
Houston Federation of Teachers #2415
Houston ISD
Inversant
LGBT Community Center of Greater Cleveland
little listeners of the Carolina / LLOTC
Long Beach Gray Panthers
Miami Valley Fair Housing Center
Northside AFT

Old Town Teachers Organization, Local 909
Professional Staff Union, MTA/NEA
Psja Aft
San Antonio Alliance of Teachers and Support Personnel
San Francisco Rising
The Miami Valley Fair Housing Center
The New York Women's Foundation
UIC United Faculty, AFT-AAUP Local 6456
Western Massachusetts Area Labor Federation, AFL-CIO