



PEOPLE'S
PARITY
PROJECT



Submitted via Regulations.gov

September 17, 2025

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

Re: Public Comments of the Consumer Law Advocates, Scholars & Students Network; the People's Parity Project; the National Plaintiffs' Law Association, and 246 Current Law Students and Recent Law School Graduates In Opposition to the Proposed Rule on the William D. Ford Federal Direct Loan (Direct Loan) Program, No. ED-2025-OPE-0016.

Dear Secretary McMahon,

The nationwide Consumer Law Advocates, Scholars & Students (CLASS) Network; the People's Parity Project; the National Plaintiffs' Law Association, and 246 law students and recent law school grads from 23 law schools across the country write to express our strident opposition to the Department of Education's (ED) proposed rule on the Public Service Loan Forgiveness (PSLF) program.

The proposed rule is an unconstitutional and illegal attempt to override Congress's purpose in establishing the PSLF program and to stifle public service careers. As described below, the proposal unlawfully seeks to weaponize PSLF into a cudgel that ED can wield to attack government agencies, 501(c)(3) non-profit organizations, universities, and other public service employers that oppose the administration's radical agenda.

The proposed rule poses notable harm to the economic well-being of law students and recent law school graduates, including the undersigned, and their ability to enter into public service careers. There exists a sizeable demand for public interest lawyers to address the access to justice gap and perform jobs in the government and nonprofit sectors that the private sector will not fill. Yet the exorbitant costs of legal education and the relatively lower compensation offered by those employers often renders public interest / public service legal careers financially untenable. As the stories of the 150 law students and law school graduates in the Appendix describe, aspiring and early-career public interest lawyers rely on the promise of PSLF to forgive

their outstanding student loans after 10 years of employment with a non-profit or government employer. That promise will vanish if they suddenly lose their ability to count student loan payments they made during the time they worked at an employer in this administration's crosshairs. The consequences of that result would be catastrophic and cause committed public servants to suddenly face crushing student debt balances that they never anticipated after 10 years. It also would deter law students from entering desperately needed jobs and break a promise that Congress made nearly 20 years ago to encourage public service careers. As one borrower explained:

I went to law school because I wanted to do work that was impactful and would improve the lives of people and communities. Without PSLF and IBR, I could not have taken the jobs I did because given the modest salaries, there is no universe in which I could have paid off my debt on any time horizon short of many decades. . . . Without PSLF and IBR, we would not have any attorneys doing public service work. Why would anyone choose to sign up for a lifetime of debt that you can't pay off?

Moreover, the rule runs fully afoul of Congress's intent underlying PSLF. If the rule goes into effect, any PSLF-eligible employer, including those that hire lawyers—state and local governments, prosecutors' and public defenders' offices, universities and public schools, hospitals, legal aid organizations, and advocacy groups—could lose their crucial ability to recruit and retain qualified public servants if ED deems them engaging in a vague "activity with a substantial illegal purpose." Those activities, and the power to disqualify targeted employers that ED seeks to aggrandize itself with, is wholly untethered to the text and legislative history of the Higher Education Act.

The purpose of ED's proposed rule is unequivocal: to advance this administration's radical agenda against immigrants, people of color, transgender and non-binary communities, and protest movements, as well as to eviscerate the public sector and civil society. As current and aspiring lawyers, we will not stand by while the government runs roughshod over foundational legal principles and basic democratic norms. Accordingly, we strongly urge ED to withdraw its proposed rule and protect—not undermine—the critical PSLF program. A law student sums the matter up as follows:

PSLF is not a handout: it recognizes that public interest lawyers deliver essential services to our communities, while sacrificing the opportunity to earn higher wages at law firms or other profitable employers. There is no place for politics or personal viewpoints in PSLF; that is why the program is available to non-profit

and government organizations that represent diverse viewpoints, for example to prosecutor and public defender offices alike.

I. ED’s Proposal Threatens Current Law Students and Recent Law School Graduates Committed to Public Service.

Since Congress created the program in 2007, PSLF has provided an indispensable opportunity for law students pursuing public service and public interest legal careers. ED’s proposed rule, however, ties PSLF’s benefits to overbroad prohibitions on illegal activity that render PSLF a shadow of its former self.

PSLF has long been an attractive feature of the federal student loan system for both students and employers. As originally conceived, PSLF would permit students to serve their communities and give employers a valuable tool to recruit strong talent. Under the proposed rule, law students will still take on significant debt, but the uncertainty surrounding an employer’s PSLF-qualifying status will drive students into private sector jobs and will eliminate a key recruiting tool from public employers’ toolbox.

A. PSLF is an Invaluable Tool for Recruiting Public Interest Lawyers and Reducing the Access to Justice Gap.

The PSLF program offers a unique incentive for public interest and community-focused lawyers to be able to offer legal services for those who need them the most. American citizens struggle to access the civil justice system. Private law firms charge hourly fees that vastly exceed what an upper-middle-class individual, or even a non-profit organization, can afford.¹ The World Justice Project ranks America in the bottom quartile of countries in terms of the number of American citizens who can “access and afford civil justice.”² As a result of this unaffordability, low-income households sought legal services for fewer than one in five legal issues.³ Even when low-income individuals faced legal issues with a “substantial impact” on their lives, they sought

¹ The largest law firms in the country can charge upwards of \$1,000 an hour for their services. David Thomas & Mike Scarcella, *More lawyers join the \$3,000-an-hour club, as other firms close in*, Reuters (Feb. 27, 2025, 16:15 ET), <https://www.reuters.com/legal/legalindustry/3000-an-hour-lawyer-isnt-unicorn-anymore-2025-02-27/>. Even ignoring the largest law firms, the average law firm’s hourly rate—adjusted for cost of living—ranges between \$215 to \$399 per hour depending on the state in which the firm is located. Clio, *Legal Trends Report* 130–31 (2025).

² *Civil Justice Sub-factors for United States, 2024*, The World Justice Project Rule of Law Index 2024, <https://worldjusticeproject.org/rule-of-law-index/country/2024/United%20States/Civil%20Justice/> (last visited Aug. 11, 2025).

³ Legal Servs. Corp. (LSC), *The Justice Gap: The Unmet Civil Needs of Low-Income Americans* 44 (2022).

legal advice for only one in every four issues.⁴ These legal issues run the gamut—relating to immigration, wills and estates, education, personal injury, consumer protection, and healthcare.⁵ And even if an individual *does* find possible legal assistance, they may not be able or willing to secure legal services. Low-income households most often face legal problems involving consumer issues, e.g., debt collection and scams, and healthcare issues, e.g., problems with an insurance company.⁶ These claims are often not profitable for private attorneys or are valued to be cost-prohibitive to bring.⁷

Addressing the access to justice gap turns on the willingness of lawyers to pursue public interest careers, but there simply are not enough attorneys who can meet the needs of low-income communities and provide free or low-cost legal services. Nationwide, there are only 2.8 legal aid lawyers per 10,000 residents living in poverty, and some states like Arizona, Florida, Mississippi, Texas, and South Carolina, have even less.⁸ Rural areas especially suffer from a lack of attorneys. Four rural counties in New Mexico lack even a single practicing attorney, and a third of counties in that state have fewer than twelve attorneys, including judges, prosecutors, and public defenders.⁹ Indiana is in a similar boat, with some rural counties having as few as five attorneys—again, including judges, prosecutors, and public defenders.¹⁰ Even rural areas in highly populated states like New York and California are so-called “legal deserts.”¹¹

⁴ *Id.* at 44–45.

⁵ *Id.* at 45.; State Bar of Cal., *2024 California Justice Gap Study* 28 (2024).

⁶ LSC, *supra* note 3, at 34.

⁷ One national study found that 75% of all civil monetary judgments were for less than \$5,200. Paula L. Hannaford-Agor, Nat’l Ctr. for State Cts., *The Landscape of Civil Litigation in State Courts* 35 (2015).

⁸ Am. Bar Ass’n, *Profile of the Legal Profession* 7 (2023). Arizona has 1.2 legal aid lawyers per 10,000 people living in poverty; the rate is 1.7, 1.6, and an astonishingly low 1.1 in Mississippi and South Carolina each. *Id.*

⁹ Donna J. Mowrer & Erin B. O’Connell, *Greening New Mexico’s Legal Deserts with the Rural Justice Initiative*, The Bar Examiner (2024), <https://thebarexaminer.ncbex.org/article/fall-2024/addressing-the-access-to-justice-gap/>.

¹⁰ Justin P. Forkner, *Online Law School: An Oasis in Indiana’s Law School Deserts?*, The Bar Examiner (2024), <https://thebarexaminer.ncbex.org/article/fall-2024/addressing-the-access-to-justice-gap/>.

¹¹ State Bar of Cal., *supra* note 5, at 4 (“Most California counties are attorney deserts or at risk of becoming one.”); N.Y. State Permanent Comm’n on Access to Just., *Report to the Chief Judge of the State of New York* 61 (noting the prevalence of attorney deserts in New York).

The access to justice gap can be attributed in part to wage disparities between individual-focused legal aid and institutional work.¹² PSLF is a crucial way to address that gap.¹³ In particular, PSLF serves as a recruiting mechanism for government and non-profit employers seeking strong legal talent. Public service employers are often financially constrained in their ability to recruit top employees because they cannot compete with private employers' wages. PSLF offsets the income a public service employee sacrifices by saving a borrower ten or twenty years worth of payments. Loan forgiveness enables those lawyers to make the choice to forego larger salaries in return for advocating for churches, community groups, indigent criminal defendants, immigrants, non-profit organizations, and local, state, and federal governments. Indeed, the entire American justice system is founded on the work of public servants like prosecutors, public defenders, deputy attorneys general, and non-profit civil legal aid attorneys.¹⁴ The Appendix is replete with contributions from law students and law school graduates committed to these careers who rely on PSLF.

It is the promise of loan forgiveness that makes PSLF a useful recruiting tool for public service employers. Take, for example, the case of state prosecutors' offices. As Charlie Smith—then the Chair of the Board of Directors of the National Association of District Attorneys—testified at the ED's public hearing on this rulemaking state prosecutors' offices are facing an “unprecedented retention crisis” and often have “standing vacancies.”¹⁵ One prosecutor from Indiana, Payton Cole, pointed out that “PSLF is the benefit that [she] hear[s] talked about *more than any other*.”¹⁶ Ironically, even the federal government leverages PSLF as a recruiting incentive when it suits its political aims. Customs and Border Patrol and recently Immigration and Customs Enforcement advertise that their jobs are entitled to loan forgiveness (see below).¹⁷

¹² State Bar of Cal., *supra* note 5, at 3; N.Y. State Permanent Comm'n on Access to Just., *Report to the Chief Judge of the State of New York* 38 (“[C]ivil legal services attorneys average compensation package is 18% less than their government colleagues.”).

¹³ See, e.g., N.Y. State Permanent Comm'n on Access to Just., *supra* note 13, at 61 (identifying PSLF as benefitting rural lawyers and recommending a similar state-level program targeted at forgiving debt for rural lawyers).


¹⁴ Nat'l Legal Aid & Defender Ass'n, *Public Service Loan Forgiveness and the Justice System* 4 (2018).

¹⁵ Transcript of Proceedings at 40, Dep't of Educ. Negotiated Rulemaking Public Hearing, Session 1, Day 1, Morning (April 29, 2025).

¹⁶ *Id.* at 96.

¹⁷ Immigrations and Customs Enforcement just began a recruitment campaign that prominently advertised the possibility of loan forgiveness. See U.S. Immigr. & Customs Enf't, Press Release, *DHS Launches 'Defend the Homeland' Nationwide to Recruit Patriots to Join ICE Law Enforcement and Remove Worst of the Worst from U.S.* (July 29, 2025), <https://perma.cc/M456-BNCV> Other law enforcement agencies also list PSLF as a benefit of employment. E.g., U.S. Customs & Border Prot., *Public Service Loan Forgiveness Program*, <https://perma.cc/7JQB-BDS8> (last accessed Aug. 22, 2025).

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Employee and Family Resources

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- Employee Assistance

Public Service Loan Forgiveness Program

CBP full-time employees are eligible to apply for the [Public Service Loan Forgiveness \(PSLF\)](#) program, a federal program designed to encourage college graduates to enter into public service. It offers tax-free forgiveness of student loan debts for government and non-profit organization employees after 10 years of public service and 120 qualifying payments.

CBP employees interested in PSLF can use the [PSLF Help Tool](#) to find out what actions are needed to meet eligibility guidelines. Student loan types and payment plans must meet program requirements and may need to be consolidated or restructured to be eligible for forgiveness once the 10-year employment requirement is met.

Eligible Loans and Qualifying Payments

Not all student loans qualify for PSLF as the program specifies only William D. Ford Direct Loans are eligible. Private loans or

Data support the proposition that PSLF has a determinative impact on the career decisions of aspiring public interest lawyers. In a survey of National Legal Aid & Defender Association members, half of respondents said they “definitely” would not have taken their current public interest job, or *any* public interest job, without PSLF.¹⁸ When contemplating how PSLF would impact their future career decisions, almost 90% said that qualification for PSLF would make them “much more likely” to accept a particular job opportunity in the future, while the loss of PSLF in their current job would make 50% of respondents “very likely” or “definite” to leave their job.¹⁹

For instance, one current law student has expressed concerns about being able to afford a career in public defense:

I'm a current 1L who plans on being a public defender. A famously low paying and high intensity job, I believe it's necessary for all citizens to gain access to the rights bestowed by our constitution by having access to legal counsel. However, I cannot afford to pay my students loans without public student loan forgiveness. As such, I would have to do something else. But, if I become ineligible after my 2L year, I cannot get jobs from firms paying enough to cover the cost of my loans. I have seriously no idea what I would do. Our country's citizens deserve the best representation, and the only way to do that is to ensure the best and brightest can afford to work low paying jobs for the public.

¹⁸ A total of 3,369 members of the National Legal Aid & Defender Association were surveyed. Nat'l Legal Aid & Defender Ass'n, *supra* note 15, at 12.

¹⁹ *Id.* at 13.

Another law student said:

The entirety of my decision to pursue law school was based around the premise of receiving PSLF for work after law school with a 501(c)(3). I was well aware that nonprofit and public sector legal work does not pay as well as private sector legal work, but I relied on the promise of eventual forgiveness under PSLF to make my goals attainable. These changes will condemn me to financial ruination.

B. PSLF Is Critical To Help Relieve New Public Interest Lawyers With Burdensome Student Debt.

Also, given the exorbitant costs of attending law school, PSLF has become a structural necessity for public service careers, including in law. Significant changes to PSLF—like that proposed by ED in this rulemaking—will drastically change the calculus for prospective students, impacting the supply of qualified legal professionals for years while also hamstringing public service employers from being able to provide effective legal services to their communities.

Without an avenue for loan forgiveness, the number of law students considering relatively lower-paying public service jobs will shrink so that they can simply pay back their loans. Like most professional programs, law schools must often charge a high tuition to cover their costs. Law students must often take on debt to pay for living expenses like housing, groceries, and insurance. It is therefore no surprise that, in the 2019–2020 school year, 64% of law school students took out federal loans for law school.²⁰ Students completing their J.D. or L.L.B. degrees in 2019–2020 had an average of \$154,650 in debt from their legal education alone, and \$164,110 in total student debt.²¹ These large debt burdens are difficult to repay with the average public interest lawyer’s salary. The average aggregate debt burden held by law students is currently \$173,573.²² Applying today’s average prevailing interest rate of 8.94%,²³

²⁰ U.S. Dep’t of Educ., Table 332.45, Digest of Education Statistics (2023).

²¹ Both figures are adjusted into constant 2022–2023 dollars. *Id.*

²² This figure is calculated based on the average 2020 law student debt burden and adjusting it to 2025 dollars. The data from the Digest of Education Statistics is the sum of the unpaid principal balance of all federal and private loans accumulated since the beginning of a student’s undergraduate program, as measured on July 30, 2020, and then adjusted into 2023 dollars. U.S. Dep’t of Educ., Table 332.45 n.6, Digest of Education Statistics (2023). This data underestimates a student’s total debt burden because it does not include the amount of uncapitalized interest a student has accrued while in an in-school deferment.

²³ Given the aggregated nature of ED’s data, it is necessary to manufacture an effective interest rate. The interest rate for Grad PLUS loans taken out for the 2025–2026 academic school year is 8.94%. U.S. Dep’t of Educ., *Interest Rates and Fees for Federal Student Loans*, Federal Student Aid,

the average student's prospective monthly payment under the standard loan repayment plan is roughly \$2,193.²⁴ While this monthly payment is high, the median annual salary for a public interest lawyer is not—coming in at just \$66,600.²⁵ Achieving PSLF in ten years is generally the only way that a borrower can handle such a heavy debt burden with such a low salary. Enrolling in the standard 10-year repayment plan (which is not available for PSLF) would burden the average law school graduate with a monthly payment that comes out to nearly 40% of their gross income. Other options for repayment are also limited. For instance, the new Repayment Assistance Plan would result in a monthly payment of \$333, assuming an annual adjusted gross income of \$66,600 for a borrower with no dependents.²⁶ Such a small payment would be insufficient even to pay down the interest accruing on the loans each month.

Essentially, absent PSLF after ten years, the average graduate would be locked into carrying six figures of law school debt for the next thirty years—impacting their ability to make major life decisions like starting a family, purchasing a car, or buying a house.²⁷

In limiting access to PSLF, ED undermines the core goals of PSLF to make it financially viable for students like law students to enter public service. Without PSLF, students in public interest careers face certain, almost insurmountable debt—facing “20 years or more of student

<https://studentaid.gov/understand-aid/types/loans/interest-rates> (last visited Aug. 4, 2025). This interest rate is neither the most generous, as it is always higher than the rate for Direct Subsidized Loans and Direct Unsubsidized Loans, *see* 20 U.S.C. § 1087e(b)(8), nor the least generous, as this rate is often lower than rates offered by a private lender.

²⁴ This estimated monthly payment does not clearly underestimate a student's potential debt burden, because the One Big Beautiful Bill Act more than doubles the annual borrowing limits on Direct Unsubsidized Loans, which carry a lesser interest rate than Grad PLUS Loans. *See* Pub. L. No. 119-21, § 81001, 139 Stat. 72, 335 (2025) (to be codified at 20 U.S.C. § 1087e(a)(4)(A)(ii)). However, any excess costs not covered by federal loans would be shifted into the private lending market, where rates are generally higher.

²⁵ *Id.*

²⁶ *See* One Big Beautiful Bill Act, Pub. L. No. 119-21, § 82001, 139 Stat. 72, 345 (2025) (to be codified at 20 U.S.C. § 1087e(q)(4)(B)(iv)(VII)) (setting the annual base payment for a borrower making between \$60,000 and \$70,000 at 6% of that borrower's adjusted gross income). An adjusted gross income of \$66,600 would result in an annual base payment of \$3,996, or \$333 per month.

²⁷ Michael Nau, Rachel E. Dwyer & Randy Hodson, *Can't Afford a Baby? Debt and Young Americans*, 42 *Rsch. Soc. Stratification & Mobility* 114, 114 (2015); Christopher Kur & Geng Li, *How Does Student Loan Debt Affect Light Vehicle Purchases*, FEDS Notes (Feb. 2, 2015), <https://www.federalreserve.gov/econresdata/notes/feds-notes/2015/how-does-student-loan-debt-affect-light-vehicle-purchases-20150202.html>; Melanie Hanson, *Student Loan Debt & Homeownership*, Ed. Data Initiative (Jan. 7, 2025), <https://educationdata.org/student-loan-debt-homeownership>.

loan payments, during which time their loan balance would increase.”²⁸ Consequently, these students will make different career choices “in anticipation of a heavier repayment burden.”²⁹ If the rule is enacted, students who choose careers with disqualified organizations will be forced to make a Hobson’s choice between spending almost half of their pre-tax income on student loan payments for ten years through the standard repayment plan or carrying significant long-term debt for thirty years under an income-based repayment plan. ED’s rule imposes a tremendous burden, and it makes the choice to pursue a fulfilling, community-focused position in the public and non-profit sectors even less feasible than it already is. It could also jeopardize the financial security of young people and their families embarking on their careers, as one law student describes:

I am a current law student planning to enter criminal law as a prosecutor or public defense attorney. I don't know if I will be able to do that with the new proposed PSLF rule because my employer may be disqualified with little recourse. I came to law school to serve my community (with the express intention of avoiding Big Law) and I don't know if that's a feasible option for me anymore. I fear for my financial future and the financial future of my children. My husband is also relying on PSLF as a school psychologist at a middle school. PSLF is extremely important to both of us because we want to serve our communities but we also have a tremendous amount of student debt. My husband serves every kid at his school who has developmental difficulties ranging from ADHD to dyslexia to autism. It's scary to think that he may not qualify for PSLF if his school district is found to be in violation of the laws proposed by the new PSLF rule. We both pursued higher education to make our communities and this country a better place. PSLF allows us to pursue our dreams of public service while also obtaining financial security.

II. The Proposed Rule Is Vague And Would Hinder the Ability of Thousands of Law Student Borrowers To Serve Vulnerable Populations.

The proposed rule will harm the ability of law student borrowers, like the undersigned, to serve vulnerable populations. If the rule goes into effect, thousands of lawyers will find that their public interest careers have been rendered ineligible for PSLF. The rule does not just rip law students from legal services for low-income Americans, but it discourages them from pursuing these fields altogether. Law students are also dissuaded from even engaging with employers in

²⁸ Public Service Loan Forgiveness, American Bar Association, https://www.americanbar.org/advocacy/governmental_legislative_work/priorities_policy/legaleducation/pslf-homepage/?login (last visited Aug. 7, 2025).

²⁹ Jonathan D. Glater, *Law School, Debt, and Discrimination*, 68 Journal of Legal Educ. 548, 550 (2019).

those fields due to the rule's anticipated effect on PSLF eligibility. The discretion afforded to ED by this rule introduces vagueness to a pathway for forgiveness, introducing financial risk that many law students cannot afford.³⁰ According to one recent law school graduate, the proposed rule, could upend their career:

Since graduating law school four years ago, I have found PSLF invaluable, but I am concerned that the proposed rule could affect my future career. I am the first in my family to go to law school, and PSLF made it possible to do what I came to law school to do: seek careers in public interest and public service, including judicial clerkships, that enabled me to help others. The Proposed Rule threatens me and others who might be in a similar situation — trying to help others — by making a viewpoint-dependent set of judgments over who deserves to qualify for loan forgiveness. These judgments, if enacted, will be at odds with what Congress intended. But more importantly, they threaten my ability to do work to serve others.

Another law student puts it succinctly:

The proposed rule is the reason I did not pursue a career in public service.

By categorically denying PSLF eligibility to entire employers based on particular activities, the proposed rule harms all borrowers employed at that workplace. The proposed rule is particularly vague in its potential application of a “substantial illegal purpose.” Imagine, for example, a workplace harassment suit that results in a judgment that a city violated Title VII of the 1964 Civil Rights Act. Under the proposed rule, would that judgment of “illegal discrimination” render the city ineligible for PSLF, meaning that all city employees (including attorneys) could not seek loan forgiveness? Although ED has represented that this would not be the case, the proposed rule does not sufficiently protect against that outcome.

Furthermore, even if ED were to exclude employers with a “substantial illegal purpose,” the proposed rule punishes workers beyond its own criteria. Imagine an immigration law clinic through a public university becomes the target of a federal Department of Justice investigation.³¹

³⁰ “More borrowing increases the riskiness of investing in higher education of any sort, including law school. Students who are more risk averse, who may be disproportionately students whose life experiences have already shown them the burdens of financial insecurity, will respond to this risk shift. Because more students than ever must borrow to pay for law school, the impact could be significant.” *Id.*

³¹ The administration recently published a memorandum accusing immigration attorneys of fraud and threatening them with investigations and sanctions, claiming their work has “supplanted the constitutional and lawful bases upon which the President exercises core powers under Article II of the United States Constitution.” *See Preventing Abuses of the Legal System and the Federal Court* (Mar. 22, 2025)

If that investigation resulted in a finding of “aiding or abetting . . . [f]ederal immigration laws,” even if the clinic are protecting the constitutional due process rights of an undocumented person, then *all* employees of the university system could be ineligible for loan forgiveness, not just those contributing to the purported “substantial illegal purpose.”³² This is significant because public university systems are the largest employer for one in every five states.³³ If employees bleed from the university system as a result, support for students will significantly dwindle. Outside of the legal system, these ramifications seem even more unfair—teachers pursuing loan forgiveness are impacted by a negative lawsuit elsewhere in the district, social workers at a large nonprofit may lose eligibility if their colleagues aid an immigrant family, and a radiologist nearing the end of her loan forgiveness journey could quickly find herself saddled with eight years of underpaid principal ballooned by interest because her institution made a decision this Administration disagreed with.

The domino effects of this rule are endless and its aims are clear. To turn categorical forgiveness eligibility into a discretionary decision by ED is to subject student borrowers to a system already rife with abuse. The line for loan forgiveness eligibility will consistently be redrawn or redirected and America’s law students and lawyers will have no certainty as to whether they will be responsible for debt their government promised to forgive. Under this proposed rule, public sector and non-profit employers and their employees who were previously eligible for PSLF will soon find themselves in a race with no finish line.

III. The Proposed Rule Violates Congress’s Intent to Support Law Students And Other Borrowers From Entering Public Service Careers.

The proposed rule also plainly violates the text of the Higher Education Act (HEA). The HEA authorizes the forgiveness on interest and principal of any borrower who has made 120 monthly payments on their federal direct loan and is “employed in a public service job” at the time of each payment and the time of forgiveness:

The Secretary shall cancel the balance of interest and principal due . . . for a borrower who has made 120 monthly payments on the eligible Federal Direct Loan after October 1, 2007, pursuant to any one or a combination of [federal repayment plans under the HEA]; and is employed in a public service job at the time of such

<https://www.whitehouse.gov/presidential-actions/2025/03/preventing-abuses-of-the-legal-system-and-the-federal-court/> (last accessed August 22, 2025).

³² ED’s insistence that it would keep employer units separate and distinct is vague and unsubstantiated, especially since employer PSLF qualification is generated by an organization’s single Employer Identification Number.

³³ Rachel Gillett, *The Largest Employers in Each US State*, Business Insider, <https://www.businessinsider.com/largest-employers-each-us-state-2017-6> (last visited August 22, 2025).

forgiveness; and has been employed in a public service job during the period in which the borrower makes each of the 120 payments described in subparagraph (A). After the conclusion of the employment period described in paragraph (1), the Secretary shall cancel the obligation to repay the balance of principal and interest due as of the time of such cancellation, on the eligible Federal Direct Loans made to the borrower under this part.³⁴

The text of the HEA is broad and mandatory in how it defines a “public service job” eligible for forgiveness. The statute can be broken down into three main types of work: (1) government, (2) nonprofit, 501(c)(3) organization, and (3) with any other type of employer, in certain listed fields.³⁵

No part of the text in § 1087e even begins to suggest that, for government and 501(c)(3) organizations, the legality or purpose of an employer’s activities may be considered when determining eligibility.³⁶ To read such restrictive language into broad and mandatory eligibility for loan forgiveness under 1087e would “run[] . . . afoul of the ‘cardinal principle’ of interpretation” which gives effect to “every clause and word of a statute.”³⁷ Also, “when Congress chooses not to include any exceptions to a broad rule,”—here, that all government and all 501(c)(3) organizations qualify—the broad rule should be applied.³⁸

Further, the text of the Higher Education Act does not confer any discretionary authority to ED to restrict eligibility of PSLF-qualifying jobs, let alone for so-called “illegal activities.” Under § 1087e(m), the actions of “the Secretary” only confer mandatory obligations. The subsection does not state “the Secretary may,” but “the Secretary *shall*” on all three occasions it appears.³⁹ Thus, there is no text in the Higher Education Act that gives ED authority to disqualify

³⁴ 20 U.S.C. § 1087e(m)(1)–(2).

³⁵ 20 U.S.C. § 1087e(m)(3)(B); see Philip G. Schrag, *Federal Student Loan Repayment Assistance for Public Interest Lawyers and other Employees of Governments and Nonprofit Organizations*, 36 Hofstra L. Rev. 27, 45 (2007) (finding that the definition of an eligible job “includes both a list of categories of jobs that are eligible and a catch-all clause that sweeps in many additional employers.”).

³⁶ The only mention of “illegal” conduct under the entire Higher Education Act is a reference to “illegal” consumption of drugs and alcohol by students, not any illegal purposes or conduct by employers. See 20 U.S.C. § 1001–1161aa(1).

³⁷ *Loughrin v. United States*, 573 U.S. 351, 358 (2014) (quoting *Williams v. Taylor*, 529 U.S. 362, 404 (2000)).

³⁸ *Bostock v. Clayton Cty.*, 590 U.S. 644, 669 (2020).

³⁹ 20 U.S.C. § 1087e(m). See *Kingdomware Techs., Inc. v. United States*, 136 S. Ct. 1969, 1977 (2016) (“Unlike the word ‘may,’ which implies discretion, the word ‘shall’ usually connotes a requirement.”); Antonin Scalia & Bryan A. Garner, *Reading Law: The Interpretation of Legal Texts* 112 (2012) (explaining mandatory and permissive language),

an employer (and as a result, its employees) from PSLF. Any other interpretation would be an abuse of ED's role and a clear-cut violation of the plain language of the HEA.

The legislative history further supports that Congress never intended for the Secretary to have the discretionary authority to pick and choose qualifying PSLF employers. Congress created PSLF as part of a broad-based series of amendments to the HEA in 2007 to include Public Service Loan Forgiveness.⁴⁰ The intent of PSLF was to “encourage participation” in public interest careers due to a concern that a “growing number of individuals . . . do not choose to enter into lower paying professions, such as public service, because of growing debt due to student loans.”⁴¹ Lawmakers expressed concern that the free market undervalued public service careers through lower wages, and so they introduced PSLF as a countermeasure.⁴² Congress also explicitly noted the “critical areas” in need of service, including “public defenders, prosecutors . . . and other public sector employees.”⁴³ In its deliberations, Congress does not express any concern for organizations that may have an “illegal purpose,” nor does it detail any reason why a job otherwise eligible under the enumerated definition of a “public service job” should be made ineligible.⁴⁴ The proposed rule's language thus runs directly counter to Congress's intent, seeking instead to improperly impose agency-created limitations on eligible employment.⁴⁵

The HEA also does not authorize ED to create any administrative adjudicatory process, such as the proposal outlined here, for identifying and disqualifying particular employers for any reason, including for engaging in so-called “substantial illegal activities.” Congress exercised its power to define eligibility for PSLF within the text of the statute, leaving no room for ED to impose extratextual limitations.⁴⁶ Indeed, there is no mention of adjudicatory authority in the PSLF statute at all.⁴⁷ The statute also explicitly refers to legal “action” as the forum for recourse

⁴⁰ Pub. L. No. 110-84, 1, 10 (2007) (codified at 20 U.S.C. § 1087e(m)).

⁴¹ H.R. Rep. 110-210 at 48–49 (2007).

⁴² Jonathan D. Glater, *The Narrative and Rhetoric of Student Debt*, 2018 Utah L. Rev. 885, 893–94 (2018) (“Compensation of teachers, firefighters and other first responders, for example, was not regarded as reflective of the value people in those careers provide. The program aims to encourage students to consider and enter these careers despite the wages paid.”).

⁴³ H.R. Rep. 110-210 at 48 (2007).

⁴⁴ *See generally id.*

⁴⁵ Glater, *supra* note 42, at 894 (“The [first Trump] Administration's view of PSLF is ahistorical, in that the program was created precisely because of legislative unhappiness with the number of students pursuing public service careers given the difficult financial consequences faced by those students who did choose those paths.”).

⁴⁶ *See* 20 U.S.C. § 1087e(m)(3)(B).

⁴⁷ 20 U.S.C. § 1087e(b)(9).

from borrowers.⁴⁸ Had Congress meant to describe a process by which ED could adjudicate and potentially disqualify employers, it would have done so, but it did not. The language of the HEA does not contemplate restricting employers in the way envisioned by the administration.

IV. Conclusion.

PSLF offers a vital incentive for early career lawyers and aspiring public servants. ED's proposal seeks to strip that incentive away based solely on the alleged actions of their employer. As the copious stories in the Appendix below make clear, this rule would pose several detrimental impacts on law students. The proposal is cruel, discourages public service legal careers, and runs counter to the express will of Congress. We strongly urge ED to withdraw the rule and permit PSLF to continue as it was designed—to promote public service among young aspiring student loan borrowers.

Sincerely,

Sonali Durham, NYU School of Law '26

Abby Smith, Berkeley Law '26

Greyson Cox, University of Maryland Francis King Carey School of Law '27

David Nahmias, Esq., Director

on behalf of

**CONSUMER LAW ADVOCATES, SCHOLARS & STUDENTS NETWORK
PEOPLE'S PARITY PROJECT
NATIONAL PLAINTIFFS' LAW ASSOCIATION
246 LAW STUDENTS AND RECENT LAW SCHOOL GRADUATES:**

1. Akanksha A., University of California, Berkeley School of Law
2. Alex A., Harvard Law School
3. Alleyah A., Fordham Law School
4. Avery A., Duke University School of Law
5. Darby A., University of California, Berkeley School of Law
6. Iliana A., University of California, Berkeley School of Law
7. Kael A., University of California, Berkeley School of Law
8. Lilliana A., University of Maryland Francis King Carey School of Law
9. Michael A., Fordham Law School

⁴⁸ 20 U.S.C. § 1087e(h).

10. Mariana A., University of California, Berkeley School of Law
11. Michael A., University of California, Berkeley School of Law
12. Suzanne A.
13. Samahria A., University of California, Berkeley School of Law
14. Teresa A., University of California, Berkeley School of Law
15. Audrey B., University of California, Berkeley School of Law
16. Amanda B., University of California, Berkeley School of Law
17. Alex B., University of California, Berkeley School of Law
18. Molly B., University of California, Berkeley School of Law
19. Abigail B., Duke University School of Law
20. Brian B., University of California, Berkeley School of Law
21. Charyl B., University of California, Berkeley School of Law
22. Cody B., University of California, Berkeley School of Law
23. Ezra B., University of California, Berkeley School of Law
24. Elise B., University of California, Berkeley School of Law
25. Ellen B., Boston College Law School
26. Erin B., University of California, Berkeley School of Law
27. Francesca B., University of California, Berkeley School of Law
28. Grace B., University of Connecticut School of Law
29. Isa B., University of California, Berkeley School of Law
30. Isabel B., University of California, Berkeley School of Law
31. Jack B., University of California, Berkeley School of Law
32. Jessica B., University of California, Berkeley School of Law
33. Linda B., University of California, Berkeley School of Law
34. Lucas B., University of California, Berkeley School of Law
35. Mariana B., New York University School of Law
36. Nirali B., University of California, Berkeley School of Law
37. Roxanne B., University of California, Berkeley School of Law
38. Susan B., University of California, Berkeley School of Law
39. Stuart B., New York University School of Law
40. Salonee B., New York University School of Law
41. Alexx C., University of California, Berkeley School of Law
42. Alejandra C.
43. Alexis C., Fordham Law School
44. Charles C., University of California, Irvine School of Law
45. Huailing C., New York University School of Law
46. John C., Duke University School of Law
47. Joseph C., University of California, Berkeley School of Law
48. Lauren C., University of California, Berkeley School of Law
49. Maelee C., Harvard Law School

50. Greyson C., University of Maryland Francis King Carey School of Law
51. Molly C., University of California, Berkeley School of Law
52. Nell C., Fordham Law School
53. Rose C., Duke University School of Law
54. Mila C., University of California, Berkeley School of Law
55. Adam D., University of California, Berkeley School of Law
56. Alexander D., University of Maryland Francis King Carey School of Law
57. Darin D., New York University School of Law
58. Danielle D., University of California, Berkeley School of Law
59. Deksyos D., University of California, Berkeley School of Law
60. Eliza D., University of California, Berkeley School of Law
61. Julia D., Fordham Law School
62. Julie D., University of California Law, San Francisco
63. Jordan D., University of California, Berkeley School of Law
64. Juliette D., University of California, Berkeley School of Law
65. King D., University of Michigan Law School
66. Margaret D., Duke University School of Law
67. Nick D., New York University School of Law
68. Payton D., University of California, Berkeley School of Law
69. Sonali D., New York University School of Law
70. Tiffany D., University of California, Berkeley School of Law
71. Zack D., University of Pennsylvania Carey Law School
72. Alexandra E., University of California, Berkeley School of Law
73. Iman E., University of California, Berkeley School of Law
74. Kiera E., New York University School of Law
75. Malakai E., University of California, Los Angeles School of Law
76. Anna F., University of Virginia School of Law
77. Kathryn F., University of California, Berkeley School of Law
78. Katy F., University of California, Berkeley School of Law
79. Spencer F., University of California, Berkeley School of Law
80. Colin G., University of California, Berkeley School of Law
81. Divya G., Georgetown University Law Center
82. Emmanuel G., University of California, Berkeley School of Law
83. Hildi G., University of California, Berkeley School of Law
84. Jude G., New York University School of Law
85. Lauren G., University of California, Berkeley School of Law
86. Mary G., University of California, Berkeley School of Law
87. Mick G., University of Maryland Francis King Carey School of Law
88. Molly G., University of Pittsburgh School of Law
89. Mike G., Duke University School of Law

90. Marlee G., University of California, Irvine School of Law
91. Natalie G., University of California, Berkeley School of Law
92. Rosa G., Duke University School of Law
93. Shikhar G., New York University School of Law
94. Sarah G., Stanford Law School
95. Tobit G., New York University School of Law
96. Aaniyah H., University of California, Berkeley School of Law
97. Abby H., Duke University School of Law
98. Blakely H., Georgetown University Law Center
99. Fiona H.,
100. Grace H., New York University School of Law
101. Kelsey H., University of Maryland Francis King Carey School of Law
102. Kennedy H., Duke University School of Law
103. Kevin H., Fordham Law School
104. Kyle H., New York University School of Law
105. Liam H., New York University School of Law
106. Liana H., University of California, Berkeley School of Law
107. Margaret H., University of California, Berkeley School of Law
108. Max H., University of California, Berkeley School of Law
109. Nick H., University of California, Berkeley School of Law
110. Sara H.
111. Thomas H., Duke University School of Law
112. Molly I., Georgetown University Law Center
113. Ari J., University of California, Berkeley School of Law
114. Ashley J., University of California, Berkeley School of Law
115. Ella J., Georgetown University Law Center
116. Katherine J., University of California, Berkeley School of Law
117. Michael J., University of California, Berkeley School of Law
118. Nina J., Duke University School of Law
119. Roc J., University of California, Berkeley School of Law
120. Sophie J., University of California, Berkeley School of Law
121. Emma K., University of California, Berkeley School of Law
122. Gabriel K., University of California, Berkeley School of Law
123. Grace K., University of California, Berkeley School of Law
124. Hope K., University of California, Davis School of Law
125. Jake K., Duke University School of Law
126. John K., University of California, Berkeley School of Law
127. Kathryn K., Fordham Law School
128. Noah K., New York University School of Law
129. Shreya K., University of California, Berkeley School of Law

130. Sky K., University of California, Berkeley School of Law
131. Teya K., University of California, Berkeley School of Law
132. Talia K., University of California, Berkeley School of Law
133. Camryn L., University of California, Berkeley School of Law
134. Drew L.
135. Emily L., New York University School of Law
136. Evan L., New York University School of Law
137. Geneva L., University of California, Berkeley School of Law
138. Gabriella L., New York University School of Law
139. Isaiah L.
140. John L., University of California, Berkeley School of Law
141. Julio L., University of California, Berkeley School of Law
142. Justin L., University of California, Berkeley School of Law
143. Jesse L., Duke University School of Law
144. Marcos L., University of Maryland Francis King Carey School of Law
145. Nina L., University of California, Berkeley School of Law
146. Sophie L., University of California, Berkeley School of Law
147. Olivia L., Fordham Law School
148. Sunnie L., University of California, Berkeley School of Law
149. Yanqing L., University of California, Irvine School of Law
150. Asma M., University of California, Berkeley School of Law
151. Aaron M., University of California, Berkeley School of Law
152. Alyssa M., University of California, Berkeley School of Law
153. Arianna M., University of California, Irvine School of Law
154. Allison M., Duke University School of Law
155. Gabrielle M., Duke University School of Law
156. Gabby M., Duke University School of Law
157. Holt M., Harvard Law School
158. Holly M., Duke University School of Law
159. James M., Duquesne University Kline School of Law
160. Joshua M., Duke University School of Law
161. Jared M., University of California, Berkeley School of Law
162. Layla M.
163. Purba M., University of California, Berkeley School of Law
164. Sarah M., Fordham Law School
165. Shree M., University of California, Berkeley School of Law
166. Tomasz M., Harvard Law School
167. Lily M., University of California, Berkeley School of Law
168. Elaine M., University of California, Berkeley School of Law
169. Abby N., University of California, Berkeley School of Law

170. Gabriel N., University of Pennsylvania Carey Law School
171. David N., University of California, Berkeley School of Law
172. Christina O., University of California, Berkeley School of Law
173. Jessica O., University of California, Berkeley School of Law
174. Kanami O., University of California, Berkeley School of Law
175. Zachariah O., University of California, Berkeley School of Law
176. Grace O., University of California, Berkeley School of Law
177. Amanda P., University of California, Berkeley School of Law
178. Aine P., Georgetown University Law Center
179. Anthony P., New York University School of Law
180. Anne P., University of California, Berkeley School of Law
181. Angelique P., University of California, Irvine School of Law
182. Clarissa P.
183. Drew P., Brooklyn Law School
184. Emma P., Georgetown University Law Center
185. Keegan P., University of California, Irvine School of Law
186. Molly P., Duke University School of Law
187. Ravi P., University of California, Berkeley School of Law
188. Tori P., University of California, Berkeley School of Law
189. Tamara P., Georgetown University Law Center
190. Eleni R., New York University School of Law
191. Estrella R., University of California, Irvine School of Law
192. Hawthorne R., University of California, Berkeley School of Law
193. Kelsey R., University of California, Berkeley School of Law
194. Lillian R., University of California, Berkeley School of Law
195. Naveen R., New York University School of Law
196. Alexandra S., New York University School of Law
197. Abby S., University of California, Berkeley School of Law
198. Ary S., University of California, Berkeley School of Law
199. Alexandria S., University of California, Berkeley School of Law
200. BenJamin S., Fordham Law School
201. Chrissy S., University of California, Berkeley School of Law
202. Deirdre S., University of California, Berkeley School of Law
203. Elizabeth S., University of San Diego School of Law
204. Greg S., Duke University School of Law
205. Ian S., University of California, Berkeley School of Law
206. Isadora S., University of California, Irvine School of Law
207. Jordan S., University of Michigan Law School
208. Julia S., University of California, Berkeley School of Law
209. Jordane S., University of Michigan Law School

210. Julia S., University of Pittsburgh School of Law
211. Jordan S., Duke University School of Law
212. Lauren S., Duke University School of Law
213. Marc S., New York University School of Law
214. Ben S., University of California, Berkeley School of Law
215. Madelyn S., University of Maryland Francis King Carey School of Law
216. Olivia S., Duke University School of Law
217. Habiba S., University of California, Berkeley School of Law
218. Ruth S., New York University School of Law
219. Sriram S., Georgetown University Law Center
220. Shelby S., Georgetown University Law Center
221. Ben T., University of California, Los Angeles School of Law
222. Malia T., University of California, Berkeley School of Law
223. Alejandro V., University of Southern California Gould School of Law
224. Helena V., University of California, Berkeley School of Law
225. Henry V., University of California, Berkeley School of Law
226. Pedro V., University of California, Berkeley School of Law
227. Alice W., University of California, Berkeley School of Law
228. Chloe W., University of California, Berkeley School of Law
229. Carly W., New York University School of Law
230. Carole W., University of California, Berkeley School of Law
231. Chelsea W., Duke University School of Law
232. Ethan W., University of California, Berkeley School of Law
233. Erin W., University of California, Berkeley School of Law
234. Grace W., University of California, Berkeley School of Law
235. Jacob W., University of California, Berkeley School of Law
236. Justin W., New York University School of Law
237. Jacob W., University of California, Berkeley School of Law
238. Kyra W., University of Maryland Francis King Carey School of Law
239. Lou W., University of California, Berkeley School of Law
240. Maria W., University of California, Berkeley School of Law
241. Nicholas W.
242. Rita W., New York University School of Law
243. Kally X., Duke University School of Law
244. Zhihan X., Duke University School of Law
245. Adrika Y., University of California, Berkeley School of Law
246. Allie Z., University of California, Los Angeles School of Law

The Consumer Law Advocates, Scholars & Students (CLASS) Network is a nationwide initiative spearheaded by the UC Berkeley Center for Consumer and Economic Justice and the National Association of Consumer Advocates dedicated to developing consumer law and economic justice curriculum, experiential opportunities, and coordinated projects at law schools around the country. Our network—comprised of law students, professors, and advocates—is made up of 20 law schools with student organizations that hold events and participate in pro bono research and advocacy projects with our partners in government and non-profit organizations, as well as 15 law school clinics that provide students with hands-on experience in consumer protection law and economic justice.

The People's Parity Project is a movement of attorneys and law students organizing for a democratized legal system which empowers working people. We are working towards our long-term goal: a world in which lawyers understand that the practice of law is inherently political, that they are empowered to choose a side and choose to fight for the people, and that they are then held accountable by their professional community and the public as a whole for shaping the law into a force for true justice.

The National Plaintiffs' Law Association proudly stands with law students and public service advocates in opposition of the Department of Education's proposed rule on Public Service Loan Forgiveness. PSLF is a lifeline to many law students hoping to commit their careers to serving communities in need. Weakening PSLF would make it financially impossible for many students to pursue careers they are passionate about, further widening the access to justice gap at a time when our country desperately needs more lawyers fighting for ordinary people. As an organization committed to supporting law students, NPLA urges the Department to withdraw this harmful rule and preserve PSLF as Congress intended.

APPENDIX. Law Student Comments In Opposition to the Proposed Rule.

1. I would no longer be able to serve my community in the non-profit sector. Without PSLF, I would have no choice but to move to the private sector to be able to afford my student loan payments.

2. I am an attorney and have worked at non-profit legal services organizations, serving low-income clients, for the past 9 years -- most recently at an organization that focuses on workers' rights. I am very close to completing the 120 months of public service work required for PSLF! But the extremely overbroad definition of "illegal activities" in the proposed rule makes me worry that I might not be able to continue working at my current job and still qualify for PSLF. I would hate to be forced to leave a job that I love and where I truly believe in the work, as a result of this rule going into effect.

3. I am a recent law school graduate currently employed in a nonprofit that provides services to foster youth. I completed law school and passed the CA State Bar Exam in 2020, during the pandemic. I made the decision in law school, starting with prioritizing pro bono work, that I would dedicate my career and life to public service. So I've only ever held jobs with legal aid, nonprofit organizations, and government institutions. I work for mission-driven institutions aimed at providing services to those people most marginalized from support in all communities, whether white, Black, Latino, AAPI, heterosexual, LGBT, citizen or non-citizen. Everyone has human and civil rights and deserves the dignity of support. My current role supports unaccompanied minor youth access to the legal and social services they need for basic stability in some of the most traumatizing life circumstances imaginable. This work is borne out of my own personal experience growing up in such situations where I had to leave home young, and was myself a homeless unaccompanied minor. That experience set me on this path to do the work I am so passionate about doing. Without PSLF, I would be unable financially endure doing this work. As it is with the cost of living and the already mediocre pay in the nonprofit sector, the PSLF program is a saving grace. It offers a lifeline in the form of an agreement we make with our community. I dedicate myself to doing the work I am meant to do in service of my community -- giving up other opportunities to build intergenerational wealth or have a chance to buy a home -- with the promise of at least having my commitment to service recognized and honored by forgiving my student loans through PSLF. This rulemaking is a direct threat to my work and my status in PSLF because the kids I work for do not get to decide whether they are born to immigrant parents, or whether they themselves were born here, or whether or not serving them is somehow "DEI". So, necessarily my work includes providing services this administration deems "illegal activities" because under this rulemaking providing services to uphold fundamental human rights and dignity of all is somehow deemed illegal. For these reasons, I oppose this rulemaking.

4. I would not have attended law school to serve the public if I had known Public Service Loan Forgiveness was not a viable path paying for law school. I went into law school with

the aim of working at nonprofits and government agencies where I could use my lived experience and knowledge to help curb acts and practices that harm ordinary people living in our community—e.g., predatory student loan repayment scams and substandard housing conditions. My family and I do not have the financial resources to pay for law school out of pocket. While scholarships and grants helped lower the cost of law school, there was no way I could have paid for it.

5. I am a law grad who has worked in the non profit and government space for the last 6 years. I went to law school to do civil rights work and I took out over 250k in loans. I would be unable to sustain this work without the PSLF program.

6. When I decided to go to law school, I knew I wanted to do public defense work. When I chose where to attend law school, I relied on the promise of PSLF. I knew that going to Berkeley meant taking on significant debt, but I also knew that with PSLF, I could make the payments I could afford on a public defender salary and have the remainder forgiven after 120 payments. After graduating, I spent a year clerking and then went into public defense appellate work. In doing so, I declined an offer from a large corporate law firm that would have paid more than double my public defender salary. I have been doing this work for 5 years now and I love the work that I do. It is deeply meaningful to me to provide the highest quality of representation to my clients who have been failed, ignored, or dismissed by many systems before reaching me. Providing my time, attention, and respect to their appeals is rewarding to me and helps ensure that our criminal justice system has integrity. I am not getting rich doing this work. I can get by, but I am not without financial stress. The work is meaningful enough to me to make that trade off worth it. I could not afford to provide this public service if I also had to fully pay off my student loans. Without PSLF, it would quite honestly not be possible to pay off my loans on my current salary. I would be left with the choice of financial ruin or leaving public service.

7. The only reason I transferred to Berkeley Law as a 2L was because I trusted in PSLF to forgive my student loans, making the tuition at Berkeley Law affordable for me. I graduated in May 2025 and will start work at a nonprofit as an immigration attorney, serving rural communities in Washington. I am terrified that PSLF, something I saw as the only way I could afford working as a nonprofit attorney, will not cover my employment.

8. The uncertainty definitely has decreased my interest in going through PSLF, but it was already a less than likely path for me, and so I don't think my story would be particularly compelling.

9. PSLF is invaluable and a major driver of people's ability to seek careers without the looming doom of forever debt. As someone interested in a career that includes Public Service, this weakens my ability to do so, for fear that I will ultimately be unable to afford my debt while helping others.

10. I am a current law student graduating in the spring. I came to law school to not only help people, but to help people who look like me. I am greatly hurt and harmed by this proposed rule. I came to law school on the promise of public service loan forgiveness because there was no other way for me to be able to afford law school. My community deserves legal services too and this proposal can chill me from working in my own community. It is of the utmost importance that the definition of public service does not change. It will derail my life and bury me in debt.

11. I have been a public interest attorney since graduating in 2018, diligently completing more than half of the necessary payments to qualify for PSLF. I have only worked for nonprofit organizations and I am seeking employment with a government agency. I serve LGBTQ+ individuals, including trans clients, who are undocumented immigrants. Under the proposed changes, I would be ineligible for PSLF. To pay for law school as a first-generation law student, I had to take out federal loans totaling almost \$200,000. Without the promise of PSLF, I could not possibly have worked in the public sector because I never would have been able to pay off my loans on a nonprofit salary. The promise of PSLF has allowed me to serve my community, while starting a family and purchasing a home. PSLF ensures that well trained attorneys with high law school debt can give back to their communities through nonprofit and government employment.

12. I am planning to enter the private sector, but the prospect of the current administration rolling back promises for PSLF really solidified the decision for me. I have worked in government before, and I was considering returning to government work after law school to continue mission-driven work, while relying on PSLF. It is really frustrating to see our careers impacted by this decision, forcing us toward the public sector given the need for financial security.

13. I am a recent law grad currently working in government service and relying on the PSLF program because I would be flatly unable to discharge my debt otherwise.

14. I am a current law student and former public school teacher. Many of my friends and classmates from teaching and now from law school rely on the PSLF program. Choosing this pathway is already more difficult for starting one's career without student loans.

15. Without PSLF, my ability to pursue meaningful work in public service and advocacy will be greatly diminished. PSLF would allow me to afford the cost of living while doing the legal work I believe in, but without it, I'm not sure that will be possible.

16. This proposed change to the PSLF program would absolutely affect my career decisions post law school. Without the safety net of the PSLF program, it would be difficult for me to make the decision to enter public interest fields given the enormous debt that I am taking on to complete law school. My past career and advocacy history would threaten my ability to use PSLF in the future.

17. I came to law school with the goal of doing public interest work, and PSLF would be the only option to enable me to do that. Cost of living alone can amount to at least \$75,000 for the three years of law school. With a public interest salary, loan amounts past \$100-150K become unpayable. If this rule change goes into effect, I would essentially be pushed into the private sector as that is the only possible way to pay the loans. Above my individual experience, there is already a significant shortage of public interest lawyers, I have seen this firsthand working in the legal aid world. This proposed change would further exacerbate the existing issue of lack of access to legal services.

18. PSLF makes law school affordable for those of us who want to pursue a law degree not for personal profit but for our communities. PSLF is absolutely the only way countless people can afford to go to law school, as well as even more people are able to get representation that would otherwise be unaffordable.

19. The financial burden undertaken by aspiring public servants in the legal profession is already astronomical. PSLF substantially mitigates the costs associated with entering the public sector following JD completion and bar passage. While peers entering the private sector often make six figures or more right after law school and can reasonably pay their student loan debt, the public sector expects the same intense time commitment and dedication to clients but provides less financial support and consequently lower ability to repay high loan balances. I cannot afford to go into the public sector without PSLF, as paying off \$200k of law school student loan debt would take me more than a few decades on a public interest salary.

20. I graduated from law school five years ago and have essentially exclusively searched for jobs in the nonprofit and government sectors because of PSLF. I went into law school to pursue public interest work, and I have only been able to pursue that work because of PSLF. I work in the international human rights space, and I have specifically avoided jobs with the United Nations, other international organizations, and nonprofit organizations registered in foreign countries because these jobs, despite falling within my interest areas and expertise, do not qualify for PSLF. Without PSLF, I would be unable to afford my student loan debt--currently about \$140,000--and would be forced to look for jobs at law firms, which pay higher but are not interesting to me and do not contribute to the public good.

21. I chose Berkeley despite receiving 0 scholarships because of the opportunities they provide for public service careers. Without PSLF, I will die in loans and will be forced to join the private sector

22. I am not planning to seek PSLF specifically because of the attacks on it, and I need more certainty about paying off my loans as soon as possible, so I plan on entering the private sector as soon as I graduate. I would love to return to public service some day, and I know so many of my dedicated colleagues who are doing much more important work for society will need their loans forgiven through this program.

23. Yes, I am a recent law school grad working in the nonprofit sector. This rule is terrifying that the progress I have made in PSLF could be lost. This rule could force me to choose between being an advocate for issues that I believe in and my basic financial stability.

24. I graduated in 2017, and after working in private practice for several years switched to working in the public sector. Though I love public service and do not want to move back to the private sector, PSLF being threatened or highly curtailed would readjust that balance. I have worked in local government for over 4 years now, and have found the work to be so meaningful.

25. I am currently a 3L who has been deeply committed to entering public interest work. From the time I applied to law school, I knew that the reason I was doing so was to work in support of the public interest. Particularly, I care about workers' rights, and practicing employment and labor law in support of the working-class. PSLF was crucial to my financial planning entering law school, including the decision to take out the exorbitant loans necessary to achieve my legal education having come from a low-income, non-lawyer family. I relied on PSLF, but now that PSLF is under threat, I am having to more seriously consider entering the private sector due to the financial pressure of my loans. There are private-sector law firms that exclusively do public-interest work, like representing unions (my passion). While I was totally not considering that line of work during my 1L and 2L years, I'm facing the reality that I might have to enter the private sector due to the financial pressure and uncertainty surrounding PSLF. Unfortunately, I'm not sure I can count on taking relatively low-paid nonprofit or government work without the certainty of the PSLF safety net.

26. PSLF is one of the only reasons that I considered law school to begin with. I knew I wanted to work in public or nonprofit sectors throughout my life and without the promise of PSLF, I wouldn't have taken these steps to continue my education and get a law degree.

27. PSLF protects students who want to be in public service but can't justify taking less than half the average big law starting salary given the extreme cost of law school. Without PSLF, the law is only available to the highest bidder, and this rule creates more undue restrictions on an already very restrictive definition of public service.

28. I would not have pursued legal education had I felt like I could count on PSLF. I've been taught that the US legal tradition cares about protecting reliance interests. I pray that remains the case!

29. I'm a 2017 grad with 2.5 more years of payments toward forgiveness. I work for the state of California and am concerned my employer will be deemed no longer qualifying.

30. The PSLF program was the reason I went to Berkeley Law, because I wouldn't otherwise be able to afford the full amount of law school debt and pursue public interest work. I

knew from the start I would go to a nonprofit, and so I absolutely depended upon the promise of the PSLF program to begin my career. Eight years in, I still am relying on it and look forward to the day my loans (now an insurmountable amount) will be behind me.

31. I entered law school intending to pursue a public sector career after I graduated. I worked in the public sector before coming to school (in state government and at non-profits), and my main interest is environmental and energy law. I'm interested in preventing harms to human health, building resilience in the agricultural system, and making sure energy is efficient and affordable for all. I also specifically made my choice of law school based on an assumption of PSLF; I chose to take on my law school debt knowing it could be forgiven after ten years in the public sector, and I decided to move across the country due to Berkeley's expertise in this area of law, and their programs that support students in the PSLF process. It was a difficult, but extremely exciting choice in my life, and I forewent other opportunities for this career choice. The proposed rule change restricting PSLF eligible organizations and entities makes me worried that I will not have my loans approved for forgiveness after ten years if I pursue PSLF. While I am technically grandfathered into PSLF, plans to dismantle the program for future borrowers had already made me wary. Many sectors of environmental work necessarily involve looking at disparate impacts on people across the U.S. It is very unclear what would be considered an "illegal purpose" under this new proposed rule. These rapid rule changes make me unable to confidently rely on the forgiveness program, I am strongly considering working in the private sector instead to at least lessen my loan burden in this uncertain climate for PSLF. This is unfortunate to me, because I have background work experience and education in the environmental and energy fields and would love to get to work on these important issues after graduating. More worryingly, I might now have trouble shifting course to a private sector position, because I had largely taken on academic experiences geared towards a public sector career.

32. I came to law school because I see the law as a tool to advocate for justice. I enrolled with plans to pursue public interest work, and am gravely concerned by the impact that the proposed changes to PSLF would have for my future and for thousands of other law students who want to pursue justice-oriented careers but don't have the privilege of graduating without debt. The proposed changes to PSLF should be understood for what they are: an attack on public interest work that doesn't suit this administration's agenda, leveraged through shrinking the talent pool by forcing the hand of law students and practitioners who have to consider their student loan debt when making career decisions.

33. I will be participating in PSLF/NYU's LRAP program. Although I believe that NYU's LRAP program will protect my coverage, long-term changes to PSLF will harm future law students' ability to work on essential issues like immigrant rights, trans advocacy, and free speech protection. The government cannot weaponize PSLF to stifle public service work that it views contrary to its partisan agenda.

34. I attended law school with PSLF as my plan. As someone who intends on working as a public defender, I fear that the administration's attacks on cashless bail as well as criminally-accused undocumented immigrants will impede my ability to work in the type of environment that will guarantee our clients Due Process and holistic, zealous advocacy. Any such discretion could be detrimental to our justice system and the labor young Americans like me expend on protecting it.

35. I am a recent law graduate planning to enter the nonprofit sector and planning to seek Public Service Loan Forgiveness. I pursued law school to begin a career in legal advocacy on behalf of, and in conjunction with, marginalized communities that lack equal access to legal systems. I incurred large law school debts in reliance on PSLF making financially feasible a career serving the community. The proposed rule would deeply impact my ability to afford a basic standard of living through the rest of my life.

36. PSLF is what makes me feel confident going into public defense, a notoriously underpaid profession. It's what gives me the confidence to unabashedly do public interest without the fear of debt.

37. I represent disabled kids, and I could not do that if it weren't for PSLF.

38. It is important to me because it has provided me the financial flexibility to go to law school.

39. I am a law student who came to law school to do public service work - specifically defending immigrants. I had planned this career with the knowledge that the government would assist me to pay off my student loans. This gave me the security to forego the opportunity for lucrative private sector employment in favor of employment that actually benefitted working Americans. The proposed changes have made me abandon my goal. I will now be seeking employment in the private sector.

40. If my work at a nonprofit is disqualified from PSLF, I would likely leave the legal field entirely. I came to law school to do this work on behalf of under-resourced people and I would not go into the private sector. Leaving the legal field would severely hinder my ability to pay back my loans, which is certainly not in the government's best interest.

41. PSLF is incredibly important because it will make or break thousands of people's ability to pursue careers in public interest. Without loan forgiveness, I would have to go into big law to pay off my enormous student loans. I went to law school to help my community with public interest law, but the financial burden is too great without this program.

42. I am a public interest law student, but thankfully, won't need to use PSLF.

43. PSLF is among the most important programs in ensuring that all Americans can obtain justice in the legal system. Without it, the threat of crushing loans would make the most talented attorneys choose to stay in the private sector. I am perfectly willing to sacrifice the great riches that come with Big Law, but I am not willing to risk being stuck with huge and unaffordable loans. As such, without PSLF, it is unlikely that I will transition from Big Law to public service at all.

44. Every decision I have made since I decided to go to law school approximately 10 years ago has been tied to the promise of PSLF: the connections I've made, the jobs I've pursued, and the places I've lived. It is not an exaggeration to say that the **only** reason I felt able to attend law school was because of PSLF. I am a first generation high school graduate with no familial financial support (both of my parents passed away when I was young)--I only felt comfortable taking on the debt associated with law school because I knew my loans could be forgiven in the future. The proposed rule would absolutely change my future career decisions, likely prohibiting me from doing the public interest work that I have pursued and dreamt of my entire life. The proposed rule will take talented, committed public servants out of the public sector and funnel them into the private sector, thereby robbing the country of some of its most passionate advocates.

45. My career plan is to engage in civil rights impact litigation. Many of the organizations I plan to work for would probably be excluded under this rule. I will graduate with over 100k in debt that I was hoping to use PSLF to afford. Without PSLF, I don't know how I can pursue my chosen career option. I also think the proposed rules are vague, in that they do not explain how students interested in government service advancing the disfavored issues (by AGs, e.g.) would be impacted. This lack of clarity is totally disorienting to my legal career and makes it impossible to plan my financial and professional future.

46. I came to law school because I wanted to serve the public, and I only felt confident doing so—and taking out the loans I needed to make law school possible—because of the guarantee of PSLF on the other side. PSLF made my dream of serving the country and its people seem realistic; without it, I don't know what work I will be able to do. The uncertainty introduced by the proposed rule is terrifying to me as I attempt to plan the start of my career and my personal and financial future. If the proposed rule goes into effect, I'll have to make very difficult choices between my personal goals of having a family and the work that I most want to do.

47. As someone dedicated to working for the public interest the recent proposed rule does not change my plans. However, it is deeply disappointing and feels like a violation of the contract I had signed when I took out the government loans.

48. I applied to law school relying on pursuing the PSLF program; I wouldn't have been able to afford my education otherwise. Without PSLF, I'll exit law school buried in debt with little viable routes to pay it besides entering the private sector. I came to law school to serve the

public interest, specifically to contribute to anti-poverty efforts, and a capricious and chilling rule like this frustrates that purpose.

49. I am a current 2L and PSLF has been the only way I could plan to afford attending a top law school and have a career in public service where the salary is far lower than big law salaries. Without the promise of PSLF, I would be left in a horrible financial position and likely would have to take my skills to a private sector job instead of public sector to pay off my loans. This would be a disastrous policy change with huge detriments to the public and those who are skilled and willing to serve the public. It strips crucial workers' financial ability to pursue public interest jobs.

50. I am pursuing a career in Education Civil Rights and the only reason why I am able to pursue this career path is because of the promise of PSLF. I've committed my entire law school career to racial justice, education, and youth because I know it is vital to my community and I was willing to go into 6 figures worth of debt because I believed that after 10 years of serving my community I would be debt free. I'm committed to serving my community and I would never consider entering the private sector but I'm terrified that I may not be able to have kids, buy a house, etc. because I may be paying off my student loans for the rest of my life.

51. I went to law school to pursue public interest environmental law and have accrued \$100k in student loan debt. I will rely on PSLF to sustain myself in a career of public interest once I graduate.

52. Current law student, planning to go into the public interest sector. Would likely have worked in government/nonprofit but will pursue private sector with unclear PSLF guidelines.

53. I would have never taken out loans in the first place had I known this program wasn't available. It completely derails my dream of being a public interest attorney and helping the most vulnerable members of my community, as I'm not able to afford to do so if PSLF goes away.

54. I am a recent law graduate currently working in the nonprofit sector. I plan to seek Public Service Loan Forgiveness (PSLF). Without PSLF, I would not have gone to law school and I would not be able to work in the nonprofit sector. One of the only reasons I am working in the nonprofit sector is because of the promise of PSLF to repay my loans. PSLF allows me to do work I care about, work to protect consumer and civil rights, by making the investment financially viable for me. It would be extremely difficult to justify working at a nonprofit without PSLF. My peers (same law school, same graduation year) in the private sector make 3-4 times my salary. At my current salary and repayment plan, it would take me 23 years to pay off my law school debt without PSLF, and my loans are about 1/3 the amount most law students take out. If PSLF did not exist, I likely would not have gone to law school. I am the first in my family to graduate from college and the first in my family to pursue a professional degree. I wanted to do work that was of

service to the public, but the way our economy is set up, it is impossible to do public-serving work and be able to provide for myself and my family without loan forgiveness.

55. I hope to enter public service, sooner than later. I believe in National strength, including a strong American national security. My lifelong dream was to enter the security services, but it seems the demons of our history threaten overriding our better angels. It's hard to justify participating in a principled great power competition for a government that looks increasingly like those that I grew up learning to oppose. I still believe in our people—including those that I disagree with. But I can't, and won't, serve somebody who will sacrifice any and all of us for nothing more than a golf course with his name on it.

56. I will endure hardship in my career of choice because I will continue to be responsible for loan repayment despite making a minute fraction of the salary of what my colleagues in the private sector are making

57. I hope to continue research and advocacy in public international law and plan to rely on the program in order to avoid corporate work.

58. Without PSLF, I will be forced to join the public sector because I will have no ways of reasonably paying off my loans while having a career that I'm passionate about.

59. As a first-generation law student, PSLF is essential to my ability to pursue law school at all, much less public interest work.

60. I'm a current 1L who plans on being a public defender. A famously low paying and high intensity job, I believe it's necessary for all citizens to gain access to the rights bestowed by our constitution by having access to legal counsel. However, I cannot afford to pay my students loans without public student loan forgiveness. As such, I would have to do something else. But, if I become ineligible after my 2L year, I cannot get jobs from firms paying enough to cover the cost of my loans. I have seriously have no idea what I would do. Our country's citizens deserve the best representation, and the only way to do that is to ensure the best and brightest can afford to work low paying jobs for the public.

61. I am a current law student looking to enter into the government and public service sector. I come from a low-income background, and this sector might be out of reach entirely for me if programs like the Public Service Loan Forgiveness are weaponized or discharged. I would be less likely to see a job in the public sector due to the severity of loans and the expense of repaying them. This issue has been further exacerbated by the insane interest rates placed on the current graduate and undergraduate students in the U.S., as well as the awful Big Beautiful Bill which caps direct subsidized loans and encourages private loan exploitation of students. I am now more likely to enter the private sector, despite wanting to serve our country and actually make America a better place.

62. PSLF enabled me to choose a career in public service. Without PSLF I would not have been able to work in the public service.

63. I am thousands of dollars in debt. Going to Berkeley Law is a very expensive investment. It's worth it because Berkeley Law is one of the best institutions to learn from if I want to be a successful and impactful criminal law attorney, which is my passion. Public Interest attorneys do not make much money or as quickly as Big Law lawyers. PSLF is supposed to help those of us interested in PI. If we don't have the PSLF program, many of us interested in PI work could change our minds because it's too expensive, and a lifetime is not enough time to pay for the education. If there is a deficit in PI lawyers, society will be unprotected. No more criminal defense lawyers, prosecutors, immigration lawyers --attorneys that society needs.

64. The entire reason why I entered the legal profession was to serve the public. These restrictions would deny thousands, if not millions of Americans their constitutional rights by depriving them of legal representation. It is directly contradictory to the belief of "life, liberty, and the pursuit of happiness" to deny people the ability to get representation on essential rights. Matters like immigration status, the ability to speak freely, and gender status are crucial for Americans in order to fulfill America's promise in its Declaration.

65. Additionally, with these restrictions, there would be significantly less career options eligible for loan forgiveness. Considering terms like DEI are vague, this rule could bar the vast majority of public interest positions. These restrictions would force me along with thousands of attorneys to leave public interest careers as a whole, which would cause a huge deficiency within the courts."

66. I would be entirely less likely to seek a job in the non profit sector because I would need to have a higher paying salary to pay off my student loans.

67. I'm going to be working as a public defender after graduation. Public defenders work for very little pay and so many of us, now, in the past, and in the future, depend(ed) on PSLF to make the thousands of dollars in debt manageable. Many indigent clients are unpopular in their communities or nationwide. I fear for what will happen to the indigent defense profession if the current administration decides that our work is no longer worth the expense.

68. I am a law student planning on entering the nonprofit sector upon graduation. PSLF is important to me because I am passionate about pursuing a career in public interest law and I do not want to feel pressured to pivot to the private sector just so I can pay off my student loans.

69. I'm a current law student already in the public sector and enrolled in PSLF. I'm about one year away from forgiveness (I'm an evening student and work during the day.) Most of my career has consisted of working much lower wage jobs because I believed in advancing the public good and being in service to people. PSLF made that choice make sense, and also allowed

me to reprioritize my payments so I could pay off private debt that made up the bulk of my student loans from undergrad. As a first generation college student from a lower middle class family, I had absolutely no idea what I was doing when I went to college. I fell victim to predatory lending practices from Salle Mae & Navient and left school with almost \$100k in debt. PSLF is one of the several federal programs that helped (or would have helped, if I am able to actually complete it next year) right some of those wrongs and make this debt burden feel manageable while I also worked as a public librarian striving to help people in their lives. I am planning to enter the public sector after graduation as well. I have diligently paid my federal loans every month for more than a decade and fought Mohela on multiple occasions to receive and keep my enrollment in this program (they are also pretty scammy), and to see it potentially taken from me with a year to go is pretty devastating.

70. I am a current law student planning to do legal services work. I came to law school to expand and protect access to basic needs, especially housing. During my time in law school so far, I've gotten to see up close just how important and difficult legal service work is. I consider myself extraordinarily lucky in that I did not have loans from my undergraduate education. I receive \$30,000 in scholarship money from my law school annually. Even though I am in a good position, the loans are overwhelming. There is no way I would be able to do the work I want to pursue and pay off the student loans I am incurring in law school. There was no other way for me to pay for this education that I am so invested in and grateful to have. The work I am pursuing is closely intertwined with the high cost of living in my home of Los Angeles, and how it pushes people into housing insecurity and homelessness. Ironically, the cost of living is difficult also for the people working to alleviate it. At all different levels of marginalization, we are all crushed by the cost of living, and PSLF is what I can rely on to do this important work while being able to meet my own needs. The idea that people like me will be unable to pursue legal services that help people paints a stark picture of a world in which nobody can afford to get by. If PSLF were to go away, I have no idea what I would do.

71. I am a current law student planning to enter the government and/or nonprofit sectors and I may seek Public Service Loan Forgiveness. I want to aid those with underserved legal needs. ED's proposed rule will leave me no choice but to enter the private sector.

72. I have a strong interest in pursuing environmental justice and animal law advocacy, and these are topics I feel very passionately about. I feel unsure about my ability to financially support these dreams of mine, and as a result, I feel that I am heavily pushed towards a career in the private sector instead.

73. I am interested in trans rights lawyering and this makes me nervous about going into that work. More broadly, I went to law school banking on being able to get public interest loan forgiveness. I very likely would not have gone to law school if loan forgiveness was not an option.

74. I am currently planning to enter nonprofit work and seek PSLF. PSLF is the only way I could possibly afford to do this work. I would not have come to law school without the promise of PSLF and the contract that I signed when I began taking out loans promised PSLF to be available for the work I want to do.

75. I'm a current 3L who will graduate law school with close to \$200,000 in debt. I came to law school to be a public defender and I am committed to pursuing a career in public defense. I've seen friends and colleagues enter law school with aspirations to pursue public defense, but have taken big law offers after feeling the pressure of paying off student loans. I am committed to public defense but knowing I will one day have my loans paid off through PSLF has allowed me to stay focused and committed to my aspirations. Without PSLF, I have serious doubts about my longevity in public defense and public service. Without it I may seriously have to consider other jobs just so I can pay off my loans.

76. As a law student planning to pursue a lifelong career in public interest, PSLF is everything to me. It represents the opportunity to pursue a career where I can use my skills to make an impact, to feel secure enough in my financial situation to potentially buy a home and start a family, and to trust that the government will not arbitrarily construe laws to control who gets those opportunities. PSLF is not a handout: it recognizes that public interest lawyers deliver essential services to our communities, while sacrificing the opportunity to earn higher wages at law firms or other profitable employers. There is no place for politics or personal viewpoints in PSLF; that is why the program is available to non-profit and government organizations that represent diverse viewpoints, for example to prosecutor and public defender offices alike.

77. As a first-generation student, the PSLF program means a lot to me in helping me with my debt, supporting my family, and giving me the freedom to choose my career.

78. I am a current law student who enrolled in law school and took on debt in reliance on the PSLF program. Changes to the program, and the uncertainty those changes have created, has made me feel uncertain as to whether I will be able to be financially stable and repay my loans. I plan to continue in a public service career, but foresee my economic position being much more precarious if PSLF's future is uncertain.

79. As an administrator at a law firm that helped people with Medicaid, I helped many of my colleagues work toward PSLF by verifying their employment in good standing. This experience affirmed my desire to go to law school and utilize PSLF, as I watched my colleagues do vital work protecting peoples' right to healthcare and have their enormous loans forgiven in recognition of their important work. My colleagues earned literal fractions of what their peers in BigLaw earned, and PSLF was a key factor in their ability to work providing a very important legal service. I want to do the same: work in the public interest without being burdened by loans for a literal lifetime.

80. I am heavily considering government; to this end I made the choice to not participate in the PEP/EIW process for big law.

81. Current law student already entered into government service and will certainly be seeking PSLF.

82. I am an older law student hoping to go into public service work. PSLF is a lifeline to being able to manage the debt I will take on with law school.

83. I am a current 1L law student planning to enter the nonprofit/public interest law sector. The PSLF is essential to my decision to pursue my passion for public interest education work; without this program, I will be forced to choose between advocating for low-income students and students with disabilities, or going into the private sector to pursue financial stability after I graduate from law school. The PSLF program helped make my passion for education law and financial stability concurrently possible, and without it, I see these two goals as mutually exclusive.

84. I am a member of UCLA's Public Interest Law Program pursuing immigration work. The entirety of my decision to pursue law school was based around the premise of receiving PSLF for work after law school with a 501(c)(3). I was well aware that nonprofit and public sector legal work does not pay as well as private sector legal work, but I relied on the promise of eventual forgiveness under PSLF to make my goals attainable. These changes will condemn me to financial ruination.

85. PSLF program is important to me because it would determine whether or not entering public service/nonprofit would be financially feasible for me.

86. PSLF is important because it is the one saving grace financially for me to be able to pursue the career I am passionate about. Without PSLF, it becomes even harder for people from underserved communities like myself to create change in the world.

87. I am a current law student planning to enter criminal law as a prosecutor or public defense attorney. I don't know if I will be able to do that with the new proposed PSLF rule because my employer may be disqualified with little recourse. I came to law school to serve my community (with the express intention of avoiding Big Law) and I don't know if that's a feasible option for me anymore. I fear for my financial future and the financial future of my children. My husband is also relying on PSLF as a school psychologist at a middle school. PSLF is extremely important to both of us because we want to serve our communities but we also have a tremendous amount of student debt. My husband serves every kid at his school who has developmental difficulties ranging from ADHD to dyslexia to autism. It's scary to think that he may not qualify for PSLF if his school district is found to be in violation of the laws proposed by the new PSLF rule. We both pursued higher education to make our communities and this country a better place. PSLF allows us to

pursue our dreams of public service while also obtaining financial security. On a personal note, we are planning to have children in the near future. I want to give my children a financially stable home to grow up in, while being able to work reasonable hours. PSLF is the exact government program which would allow us to do that. Please keep PSLF accessible and administrable to everyone who wants to serve this country.

88. I am currently a law student. I had hoped to work in the government or nonprofit sectors -- it's the entire reason I came to law school in the first place. After Donald Trump won the election, I heard from mentors that I should no longer rely on PSLF. As such, one of the main reasons I am now planning to enter private employment is because of this proposed change. It is deterring students even just as a proposal because it creates uncertainty surrounding a large amount of debt. I'm lucky in that I've found a form of post-grad employment that will allow me to do some public interest work in the private sector. However, it'll only be class-action work on cases that are likely to succeed, because of the necessary profit motive. Such a large portion of the American public that needs access to representation won't be able to provide that "profit" to firms that want to help them -- that's why public service careers matter and why making it harder to access those careers will hurt the most vulnerable.

89. I am a 2L planning to advocate for criminal justice reform. Without PSLF I would have to put that goal on hold for however long it takes to pay off these astronomical loans, and with this new rule I am virtually guaranteed to have to do that. I simply could not even consider a career in government or the nonprofit sector if PSLF was taken away.

90. I am planning to enter government and nonprofit work. This would cause significant hardship and seriously hamper my ability to serve the public interest through my career.

91. I came to law school to become a public defender but also with a deep interest in impact litigation. These rule changes make me much more hesitant to engage in that work before I have fully paid my loans.

92. I am planning to enter a government role soon so the PSLF is very important to me. Its weaponization by the Trump administration makes it likely I will instead stay in the private sector.

93. I am a recent law graduate. I attended Berkeley Law hoping to serve low-income communities and other people who have limited access to legal services, with the understanding that the student loans I took out would be forgiven through the PSLF program. If I had known that the PSLF program would be restricted with arbitrary criteria, I would have considered a different law school or means of paying for my education. I now have 6 figures of student debt and may have to switch careers if my job is no longer eligible for PSLF. This would be terrible not only for my career goals but also many clients who rely on my free legal services to access their rights and the courts.

94. The proposed rule is the reason I did not pursue a career in public service.

95. I am a law student planning to rely on PSLF in order to dedicate my career to public interest law. Without PSLF, I will be in debt for many decades, or will be forced to find work in the private sector to pay off my loans. I would not have gone to law school if PSLF was not available to me.

96. I am a recent graduate who has started my legal career representing survivors of domestic violence. The nonprofit I work at also has departments for immigration, housing, and disability rights. Ending this funding prohibits attorneys like me from dedicating their career to assisting those who need representation the most but lack the financial resources to otherwise have access to justice.

97. I am planning to enter a public interest legal career focused on civil rights, and concerned that an over-broad rule might limit my employment prospects or potentially leave me burdened with debt I did not anticipate when I committed to law school.

98. The primary motivating force in my pursuit of a legal career is the opportunity to give back to my community. As the grandson of African Americans who fled the Jim Crow south, it is clear to me how painfully recent this history is, and how things were never destined to improve. The progress our nation experienced in just two generations, from my grandparents' to mine, was not inevitable, but it was a direct result of the work of countless public servants dedicated to enacting the change they hoped to see. I have met some of these public servants, and when asked why they do the work, their answers are generally the same—because it matters. The PSLF program grants law graduates like me the ability to doggedly pursue what matters, despite challenging circumstances, by easing the financial burden of performing lower-paying public interest work. To bar the program limits the number of bright minds able to do this work.

99. I am a current law student who is planning to enter government. I am now more likely to enter the private sector, at least for the first few years of my career.

100. I chose to go to law school entirely on the premise of being able to do meaningful public service work. My education is being funded entirely by federal loans, which I will not be able to pay off without a forgiveness plan working public service. I simply refuse to work in private sector, and if my employer is deemed to no longer be eligible for PSLF, I will have immense debt hanging over me for 20-25 years until it is forgiven anyway.

101. I am a current law student hoping to utilize PSLF when I enter the environmental non-profit sector. PSLF is what made it possible for me to commit to law school. Having found out about the Trump administration's decisions regarding PSLF only days after committing to Berkeley, I had to seriously rethink my decision. I decided to continue because I knew that the administration wanted me, and people like me, to quit and I refused to bend to their will. But now,

if this rule becomes a reality, I will likely have to enter the private sector until I can repay my loans. I worry this job will be less fulfilling and I will lose my passion for this field before I can start the work I really want to do.

102. The threat to PSLF has led me to decide not to pursue a career in public interest law immediately after graduation. I feel that I cannot take the financial risk of working in the public sector with the limits on GradPlus loans, and now the uncertainty with PLSF. Instead of pursuing opportunities in local and federal government, I have now pivoted to the private sector because I cannot risk carrying \$100,000+ dollars worth of debt with no plan for forgiveness or reasonable loan repayment.

103. I want my friends to be able to pursue careers they care about and be able to help disadvantaged communities. Forcing people to go into Big Law jobs that they don't care about just to pay off their loans destroys our souls.

104. Although I am hoping to work in the government sector, without PSLF, I would not be able to sustainably enter this field with my loan debt and would likely have to enter the private sector.

105. I am a current law student very interested in entering the government sector, and I may seek Public Service Loan Forgiveness. It is no surprise that the government and nonprofit sector do not pay their employees nearly as much as the public sector. PSLF helps bridge this gap, and encourages smart and courageous students to work for nonprofit or the government sector, without worrying about the fact that they are not making enough to cover their school expenses. If PSLF program is not an option for me, I fear I will be forced into the private sector to survive, and I would much prefer to work in public service, and when there are less barriers to public work, more high-skilled students will participate in this sector, which needs the students now more than ever.

106. Since graduating law school four years ago, I have found PSLF invaluable, but I am concerned that the proposed rule could affect my future career. I am the first in my family to go to law school, and PSLF made it possible to do what I came to law school to do: seek careers in public interest and public service, including judicial clerkships, that enabled me to help others. The Proposed Rule threatens me and others who might be in a similar situation — trying to help others — by making a viewpoint-dependent set of judgments over who deserves to qualify for loan forgiveness. These judgments, if enacted, will be at odds with what Congress intended. But more importantly, they threaten my ability to do work to serve others.

107. I am going into tenants rights work, and I am now very unsure how I will be able to make ends meet doing this work.

108. Current law student, I don't think it would affect my choice but it would make my life significantly harder.

109. PSLF is vitally important to me as an aspiring public interest attorney. Two careers of interest to me --a position with the California Attorney General or a role as a public defender-- could be closed off to me by the overly broad language of the proposed changes to the PSLF program.

110. I come from a low-income first-generation family. The only way I could get a higher education was to take out government student loans. I knew from an early age that I wanted to work in public service because I believe it is important to give back to the community. I have had a lot of people in the public service sector help me and my family and I want to pay it forward and continue this important work. This program is crucial for students who want to dedicate their life to public service. Without this program, I will be forced to enter the private sector and leave the work and career that I imagined for myself and that I am passionate about.

111. I'm a 2021 grad who has been working toward PSLF for the last four years. Every decision I've made towards pursuing a public interest law career has been made believing that PSLF would be attainable.

112. I am a current law student and I'd like to work in the nonprofit sector with a focus on trans rights. I intend to do this even if the PSLF parameters change, but it will make long term financial planning much more difficult for me, and may prevent me from reaching other personal milestones such as buying a house or paying off student loans in a timely manner.

113. I am a 2018 Berkeley Law graduate. I have been in public service positions (legal aid, state clerkship, and State of California employment) since I graduated and I rely upon PSLF to be able to afford my student loans and remain in public service employment. I currently work in anti-discrimination law, which includes upholding rights to gender affirming care and immigrant rights and could be interpreted to include diversity, equity, and inclusion. My career is devoted to upholding individual rights and addressing system injustice. Anti-discrimination law protects all individuals' rights to be free from discrimination. It's darkly comical, that a state civil service position in anti-discrimination law could be deemed ineligible for PSLF eligibility - exactly what this proposed rule may accomplish.

114. The PSLF program is vital for students pursuing public interest careers -- which our legal system needs more of. When I was debating whether to commit to law school and assume significant debt, my friends who already worked as lawyers in the public interest space reassured me that PSLF had made their careers possible. As someone with no interest in Big Law, PSLF was a major factor in my ultimate decision to attend law school as a public interest student. However, due to the increasing instability in government and nonprofit work created by the Trump Administration, I have since decided to pursue private sector opportunities after law school. These

threats to PSLF will discourage law students from pursuing career paths where there is significant legal need. In some cases, it will discourage aspiring lawyers from even applying to or attending law school, uncertain as to how they would pay off their debt.

115. I am a current law student planning to enter the government and nonprofit sector. Without PSLF, my financial future will be in serious jeopardy. My partner is a social worker, and both of us will likely be ineligible for PSLF under this proposed rule. Our ability to save for retirement will be seriously hampered, and we may have to move out of the public sector into private work in order to achieve our life goals of owning our own home. Additionally, we are heavily disincentivized to have children as we are already worried about being able to pay for child-rearing. Without PSLF, many of our life goals will need to be rethought. Neither of us come from wealthy families, and we've both worked our way through college and graduate school. Removing PSLF will constrain our job options, where we can afford to live, and whether we can buy a house or have children, not to mention our ability to retire or provide for family members in their old age.

116. Current law student, undecided in career but may end up going into public interest. I do not have loans (so probably not an ideal challenger to the rule) but many of my friends in law school relied and rely on PSLF

117. Current law student planning to enter government service after graduation. Like many people coming from a family that is not well off financially, PSLF represents a unique opportunity for me to pursue public interest work that might otherwise simply not be financially tenable for me. We want skilled, passionate advocates doing public service work, and we would all be worse off if these roles are open only to those who come from backgrounds that afford them the financial freedom to pursue this work or those who aggressively minimized their debt by foregoing opportunities that may have made them even stronger advocates.

118. I will graduate in May '26 and I always planned to use PSLF. I will graduate with over \$100k of debt, and if me or my employer lost PSLF eligibility, I don't know if I could afford to pay back my loans. The vague and politically charged language in the rule means I will be less likely to pursue civil rights work, advancing advocacy on behalf of marginalized groups because of the weaponizing and dog-whistle rhetoric being used in the rule. The private sector is becoming more appealing, specifically plaintiff's side firms. Also, state government work feels like it might be safer, but still dangerous in blue states which may take up causes to protect marginalized groups against federal executive policies.

119. Without PSLF I would be more likely to seek and stay in the private sector. This would go against my true heart and passion for public service and the reason why I went to law school.

120. I plan on using PSLF and the changes could limit my career options.

121. I came to law school to pursue public interest immigration work. I turned down multiple full ride scholarships to lower ranked law schools, after Duke Law assured me that my loans would be manageable through PSLF. I turned down law firm offers in order to pursue public interest immigration work over both summers. Had I known three years ago that the program would be at such risk, especially for immigration lawyers, I wouldn't have taken on the debt I did. I acted in reliance upon the program.

122. Current law student interested in immigration and human rights work, so this would place an obstacle on that.

123. Public service loan forgiveness is the only way I can afford to do public service oriented work. Would PSLF cease to exist, I would be forced to work in the private sector out of financial necessity.

124. I had considered working in the government, specifically State Department, but do not wish to do so under this administration.

125. I will be entering the private sector, however, I care about the program.

126. I want to work in defense of the First Amendment. Many of the organizations involved in protest defense work also organize protests themselves and could be targets of PSLF winnowing. If target organizations were deemed ineligible for PSLF, I would be precluded from working there due to student debt.

127. I wanted to pursue law so that I could further equity and serve the public in the public sector. Now, with PLSF jeopardized, I fear I will have to compromise my goals or else be unable to surmount the debt I have undertaken for this degree. The PSLF program is important to me because it makes it possible for students like me, who don't come from wealthy families, to utilize their law degree for the betterment of our country; Passionate changemakers who choose lower paying positions because they believe in the power of law to effect positive change in the world.

128. I am a recent law school graduate who has just started a public interest fellowship with the City of Chicago's Department of Law. I grew up in the Chicago area, and I chose this role because I wanted to serve my hometown and help protect its most vulnerable residents from economic exploitation. The proposed rule jeopardizing PSLF eligibility for government employers would directly undermine my ability to do this work. The current administration has repeatedly targeted Chicago for ideological and political reasons, and under this rule, they could strip away my ability to count my service toward loan forgiveness simply because of where I work. Without PSLF, I would not be able to sustain a career in local government or public interest law generally. This change would not only threaten my personal financial stability—it would dissuade many young lawyers like me from pursuing jobs in the public sector at all. The effect would be fewer

attorneys serving in critical roles at the very time communities like mine need us most. PSLF is the only reason I could realistically choose a career in public service over private practice. Weakening it in this way would close the door for me, and for countless others, to serve the communities we care about.

129. I am a first generation law student committed to public interest. I grew up in the Bay Area – one of the most expensive places to live in the country – in a single-parent household with two other siblings. I intimately know what it means to worry about covering basic expenses. Despite this, my family remained committed to community work; my mother was a teacher, my father is a case manager for children with disabilities, my twin sister is in medical school, and my older sister is working towards her MSW. Public service has been modeled for me my whole life. My personal experience and my work across legal, advocacy, and organizing spaces has reinforced my belief that meaningful, long-lasting change comes from a model that pairs community-centered legal services with structural policy reform. As I continue my legal education, I am building the foundation for a career that integrates legal representation, community education, and policy advocacy—tools I believe are necessary to support clients holistically while driving systems-level change. Staying true to this vision and goal has been a challenge. Law school is priced and structured to funnel students into high-paying, corporate firms. There is very little funding available for public interest students, even at law schools that hold themselves out to be public interest focused. There are “Donate a Day's Pay” campaigns asking students with corporate firm salaries to donate a single day's salary to help fund public interest students’ summer stipends. Law school costs the same for all students no matter what career path they choose after. However, without PSLF, I will be expected to pay back the same amount of loans, and at the same rate, as the students who can fund my summer stipend with a single day of their summer salary. I am committed to public interest and service work, but I am also aware of how living with insurmountable student debt will impact my life. Without PSLF I will need to find a way to pay my loans before going into public service. Instead of going into public interest immediately after law school, I am now also applying to firms that can support me financially without feeling like I am sacrificing my sense of self and purpose. The PSLF program made going to law school to pursue my dream possible. I hope this dream is not a dream deferred.

130. PSLF is the only way I can realistically pursue a career as a public defender. If I cannot be certain that my work will ultimately allow me to achieve loan forgiveness, I will spend the first decade of my career in constant anxiety about my future financial stability.

131. I'm interested in doing consumer protection-related work, and the Trump Administration's attacks on PSLF have made me more hesitant to pursue public sector employment. The PSLF program is the only reason why I am considering working for the government. I have loans and will not be able to pay them off without either PSLF or the higher salary that I would receive working at a private law firm, and I'm worried that Trump will eliminate PSLF for state and local government attorneys.

132. More likely the private sector.

133. I'm being asked to turn on my morals just to survive.

134. PSLF will allow me to pursue the work I am passionate about: to help everyday Americans be able to afford a decent life for themselves and their families.

135. I am a current law student, and I hope to work do advocacy or direct legal services work at a free legal services nonprofit after graduation. I hope to work with tenants facing eviction or individuals who are being sued for collection of credit card debt. Most people who are defendants in consumer debt or eviction defense cases cannot afford to pay attorneys to represent them, while their opponents in courts are almost always represented. If I'm not able to access PSLF loan forgiveness after ten years of this work, I may need to seek other employment opportunities and avoid providing legal assistance to those who need it the most.

136. I always knew I wanted to work in public interest. The PSLF made it possible. I come from a single parent household and Pell grant recipient. Not having this form of relief would greatly affect me and my future family.

137. Without PSLF, I would be forced to enter the private sector when my passion is people, and my heart is with the public sector. Alternatively, I would start in the public sector or state government only to crumble under the weight of the debt that I took on with the understanding that it would be forgiven during my career of public service. I chose this career for its longevity; for the ability for me to evolve and grow, without the weight of debt later in my career because I have always known that I was meant to work in the public interest.

138. PSLF is important for first-generation attorneys from low income backgrounds who might not otherwise view careers in the public interest financially feasible.

139. If not for the PSLF program, I would be forced to work for a private firm instead of helping to produce more just outcomes from our court system by representing individuals who cannot afford a lawyer. My family cannot afford to help me pay off law school loans.

140. I am a recent law grad planning to enter the nonprofit sector and planning on seeking Public Service Loan Forgiveness. I went to law school so that I could do public interest work as a lawyer, and I chose to go to the law school I went to -- in a city with a high cost of living -- based on the understanding that even though public interest lawyering work does not pay well relative to the cost of my education, that PSLF would make paying off my loans manageable. Moreover, I am a first generation college graduate and came from a lower-income, blue collar working class family, and thus the burden of my loans and supporting myself are entirely my own. If I am unable to use PSLF, I would likely need to switch to working in the private sector. In the private sector, even if I am able to do some public interest work as part of my overall work, I will not be able to do the civil rights work working with indigent clients that I hope to do.

141. Due to my student loan burden, the proposed rule would make me more included to enter the private sector

142. I would be less likely to seek a government or public interest job if Public Service Loan Forgiveness were limited.

143. I moved across the country and entered law school in the summer of 2024. I took on significant loans with the expectation I would be able to use PSLF to finance my public interest career. I went to law school for the purpose of doing public interest law. I plan to enter family defense (i.e. defending parents against accusations of abuse or neglect), which would likely be considered “aiding or abetting child abuse,” despite the fact that parents have a constitutional right to counsel when their parental rights are at stake. Robust family defense is critical to keeping families together and protecting parents' constitutional rights to raise their children. Public (criminal) defense will likely also no longer be PSLF-eligible - for example, advising clients of their immigration consequences (which is required under *Padilla*) and advocating for an outcome that minimizes those consequences will likely be considered “abetting violations of immigration laws.” I have dedicated my law school career thus far to public and family defense and I hope to dedicate my career to expanding access to holistic defense; however, if I cannot access PSLF that will significantly impact my ability to pay my loans back and support myself while on a public defender salary.

144. For ten years, I have been doing public interest work, including federal service. My law school debt is astronomical and my annual salary throughout my legal career has never come close to the amount of my total loans, even before they began accruing interest. I went to law school because I wanted to do work that was impactful and would improve the lives of people and communities. Without PSLF and IBR, I could not have taken the jobs I did because given the modest salaries, there is no universe in which I could have paid off my debt on any time horizon short of many decades. PSLF and IBR are critical mechanisms that in combination made it possible for me to do work that has benefitted the public. Today, as a mid-career lawyer, my salary is a good amount lower than that paid to first year associates in private practice. Even with the promise of PSLF, there are burdens of carrying this debt. For example, it has introduced challenges to getting a mortgage and deciding to get married, which would result in combined finances. Without PSLF and IBR, we would not have any attorneys doing public service work. Why would anyone choose to sign up for a lifetime of debt that you can't pay off?

145. I'm a student going into Big Law but we need people to go into all types of public services in order for our country to survive.

146. I have lived my entire career with an intention of going into public interest non-profit or government work post law school. Without PSLF, I would have a really difficult time mitigation loan burden and may have to focus on private options. I had always dreamed of working in administrative law or regulatory law and now I feel as though that pathway is limited.

147. I am a current law student who may or may not qualify for or avail myself of Public Service Loan Forgiveness. I do know that I want to work in some form of Public Interest Law, and I am concerned about how proposed limitations in the organizations a PSLF beneficiary can work for will impact the perspectives that are represented at these organizations. Closing off opportunities for people who don't have sufficient financial resources to engage in public interest law without some financial assistance such as PSLF provides means, in addition, closing off opportunities for the organizations to represent fully the American populace in terms of opinions and experiences. It is an error and disservice to our society to limit the type of organization that PSLF-qualified lawyers can work for. In addition to unreasonably constraining the career choices of the less wealthy, such a policy would ensure some organizations are flooded only with representatives from more privileged social groups, creating a greater social imbalance and further polarizing our discourse.

148. Would be less likely to seek a public interest job. more likely to enter private sector.

149. I am a current law student who plans to enter the government and/or nonprofit sectors and may seek Public Service Loan Forgiveness. The proposed rule could impact my career by preventing me from being able pursue the jobs that initially motivated me to attend law school. I fear that the non-profits I would most like to work at will be unfairly targeted under the proposed rule, and therefore not be eligible for loan forgiveness. I will be graduating with substantial student loan debt and whether or not an employer qualifies for PLSF will be a critical factor in where I apply for employment. Making it financially infeasible to work at certain non-profits, while financially feasible to work at others, based purely on the viewpoint and subject matter of that non-profit, severely limits my first amendment rights to free speech and assembly, and my freedom as an American citizen.

150. I came to law school with the sole intention of working in public interest. I'm taking out many loans to attend school and planned on relying on PSLF in my career to manage loans. Now, though I remain committed to a public interest legal career, the financial barriers are exponentially higher and the push out of the field is that much stronger.