



On behalf of the United Church of Christ (UCC), we oppose the Notice of Proposed Rulemaking (NPRM) (RIN 1801-AA28) to the Public Service Loan Forgiveness (PSLF) program due to our belief that public servants who serve the least of these (Matthew 25:40-45), including immigrant children, trans children, undocumented immigrants, and other marginalized individuals, do holy work that honors God. With nearly 1 million members of the United Church of Christ across the country, many of our members benefit from the PSLF program. Their work, and the work of all public servants, is essential to preventing further workforce shortages that jeopardize national security, public health, and community safety. The proposed rule change goes against our theological tenets of loving our neighbor as ourselves. The UCC has spoken prophetically about the importance of the PSLF program and the need for more equitable education expenses.

Without PSLF, many public servants—especially those in rural and underserved areas—would be forced to leave public service for the private sector, where salaries are often higher. PSLF is a contract: a deal that was made between public service workers to commit to 10 years (or more) of service while making 120 on-time loan repayments. For these public service workers to continue improving the lives of our communities, we need to invest in them and fulfill a promise made. PSLF was signed into law by a Republican president and has bipartisan legislative support. It provides pathways for those who are most interested in lifelong public service careers. It is a proven investment in America's workforce that should be safeguarded to ensure communities across the country receive the critical services public service professionals provide. This program is not only essential, but efficient. The program is a powerful tool for recruiting and retaining the best and brightest in public service, from first responders to prosecutors and medical professionals.

The NPRM would specifically target teachers at schools that help immigrant children learn English; counselors at universities with diversity programs; administrators at colleges providing gender-affirming healthcare; nurses at children's hospitals providing transgender youth care; social workers at clinics serving undocumented patients; doctors at community health centers in sanctuary cities; lawyers helping immigrants navigate the legal system; advocates working on civil rights cases; staff at organizations challenging government policies in court; teachers, firefighters, social workers, receptionists, clerical workers, and grant administrators in cities with sanctuary policies; employees of state universities with diversity initiatives; workers in local governments that share information about their residents' rights or that take position on issues in the community.

The Department of Education does not have the statutory authority to redefine employer eligibility for the PSLF, and we urge the Department to withdraw this proposed rule. This NPRM grants the Secretary broad discretion to weaponize the PSLF program in order to unconstitutionally target organizations that have viewpoints that diverge from the Administration's. We strongly urge the Department to withdraw this NPRM, which seeks to punish state and local governments and non-profit organizations and would harm hundreds of thousands of borrowers in the process.