



GRADUATE, UNDERGRADUATE AND EQUITY AFFAIRS

OFFICE OF THE PRESIDENT
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Oakland, California 94607-5200

May 5, 2025

Ms. Tamy Abernathy
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Ave. SW
5th Floor
Washington, DC 20202

RE: Negotiated Rulemaking Committee; Public Hearings, Docket ID: ED-2025-OPE-00016

Dear Ms. Abernathy:

Thank you for the opportunity to respond to the April 4, 2025 notice to receive public feedback and establish a negotiated rulemaking committee as referenced in Docket ID: ED-2025-OPE-00016. The University of California (UC) appreciates the U.S. Department of Education's efforts to solicit comments on a variety of complex issues.

Outlined in our letter is a general overview of UC's perspective, along with some examples of the possible impact. UC urges the department to undertake a negotiated rulemaking process to solicit the input of a wide-ranging group of stakeholders who have the expertise and knowledge of the issues outlined in this letter.

Public Service Loan Forgiveness

The University of California enrolls nearly 300,000 students and has 2.5 million alumni, many of whom are pursuing or are working in public service fields. UC is also the second largest employer in California, with a mission rooted in public service. We encourage the department to work within the statutory framework and maintain the current regulatory structure and employment eligibility criteria for the Public Service Loan Forgiveness (PSLF) program. This includes:

- U.S.-based government organizations at any level (federal, state, local or tribal), including the U.S. military.
- Not-for-profit organizations that are tax-exempt under Section 501(c)(3) of the Internal Revenue Code.
- Other not-for-profit organizations that devote a majority of their full-time equivalent employees to providing certain qualified public services, such as public health, emergency management, public interest law, public education and more.



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Refining or narrowing the definition of public and private not-for-profits would be detrimental to the intent of the program and would create barriers in attracting and retaining people in public service roles.

Income-Driven Repayment

Income-Driven Repayment (IDR) is the pathway for borrowers to qualify for PSLF. UC supports the following IDR reforms:

- Count the months that SAVE plan borrowers are in administrative forbearance toward PSLF during ongoing litigation. These borrowers are unable to make progress and should not be penalized for circumstances beyond their control.
- Consider re-implementing the SAVE/REPAYE plan with modifications to facilitate affordable monthly payments for borrowers. This plan offered an affordable monthly repayment option to most borrowers pursuing PSLF.

The University of California appreciates the opportunity to comment on the Department of Education's plan to address these issues via negotiated rulemaking. If you have any questions regarding these comments, please contact Associate Vice President Chris Harrington at Chris.Harrington@ucdc.edu or 202-997-3150.

Sincerely,

Shawn Brick, M.P.P.
Associate Vice Provost, Student Financial Support
University of California, Office of the President

cc: Provost and Executive Vice President Katherine S. Newman, Academic Affairs
Senior Vice President Meredith Turner, External Relations and Communications
Associate Vice President Chris Harrington, Federal Governmental Relations