

December 2, 2024

Nasser H. Paydar, Ph.D
Assistant Secretary for Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC, 20202

RE: Docket ID ED-2023-OPE-0123

Dear Assistant Secretary,

We, the undersigned 238 organizations representing millions of students, borrowers, workers, people of color, veterans, people with disabilities, and consumers crushed under the weight of the student loan debt crisis, **write in strong support of the Department of Education’s (the Department) released Notice of Proposed Rulemaking (NPRM) to provide student loan debt relief to student loan borrowers experiencing hardship.**

We applaud the Biden-Harris Administration’s efforts to deliver on President Biden’s promise of sweeping student loan debt relief. For too long, the student loan debt crisis has inhibited [homeownership](#); hindered [retirement savings](#); stifled [small business formation](#); exacerbated racial and economic inequities and [widened the racial wealth gap](#); worsened economic insecurity for the most vulnerable borrowers, including [seniors](#) and [people with disabilities](#); and worsened [health disparities and the mental health crisis](#). When President Biden and Vice President Kamala Harris were elected, millions of Americans urged them to tackle the student debt crisis as the intergenerational, racial, gender, and economic justice issue that it is and we have been proud to see the Biden-Harris Administration answer these calls and continue the fight to deliver the relief he has promised. Over the last three years, the Biden Administration has made history delivering an unprecedented [\\$175 billion in student loan debt relief to nearly 5 million student loan borrowers](#) by ensuring that borrowers are finally able to get the relief they have been entitled to under federal law.

While the relief delivered thus far has been monumental, tens of millions of borrowers were robbed of sweeping relief when the conservative majority of the Supreme Court [struck down](#) the Biden-Harris Administration’s original debt relief program. Since then, a coalition of Attorneys General have brought partisan lawsuits challenging the Administration’s efforts to provide more narrowly tailored debt relief and even blocking the SAVE repayment plan which is intended to help borrowers affordably keep up with their monthly student loan bills. These lawsuits have left millions of borrowers—including the 8 million that were already enrolled in SAVE—in economic limbo. With the upcoming change in administration, millions of student loan borrowers now face a future of even further uncertainty.

As drafted, the Biden-Harris-Harris Administration’s proposed NPRM would provide much-needed and long-awaited relief to millions of borrowers and their families whose student loan debt is worsening financial hardship and have been left to navigate the mass confusion and chaos that has taken over the student loan system as a result of these partisan lawsuits.

The proposed rule clarifies the Secretary’s longstanding authority and provides necessary flexibility, now and in the future, to automatically cancel debt for borrowers most likely to face difficulties repaying their student loan debt and consider a wide-ranging list of factors when considering whether a borrower is experiencing hardship. If enacted, this rule has the potential to free millions of borrowers—including Parent PLUS borrowers—from the crushing weight of the student debt crisis and unlock economic mobility for millions of workers and families.

The Department’s proposed hardship rule represents critical progress in the fight to combat the student debt crisis and protect borrowers from the crushing burden of student debt. We thank the Biden-Harris Administration for heeding the calls of tens of thousands of borrowers and hundreds of national, state and local organizations to unveil such a bold and life-changing proposal and stand ready to work in partnership with your Administration to do as much as possible to protect borrowers and alleviate the burden of the student debt crisis.

Sincerely,

National Organizations

A. Phillip Randolph Institute
Affordable Homeownership Foundation Inc
AFGE Local 252
AFL-CIO
AFT
Amazon Labor Union
American Association of University Professors
American Association of University Women (AAUW)
American Federation of State, County and Municipal Employees (AFSCME)
Autistic Women & Nonbinary Network
Blue Future
Center for Law and Social Policy
Clearinghouse on Women's Issues
Consumer Federation of America
Consumer Reports
Consumers for Auto Reliability and Safety

Council on Social Work Education
CWA
Dream Defenders
EdTrust
Empowering Pacific Islander Communities (EPIC)
Equity Research Cooperative (EqRC)
Faith in Action Network
Formerly Incarcerated College Graduates Network
Fosterus
Generation Hope
Hip Hop Caucus
Hispanic Federation
Houston Federation of Teachers
Illinois Social Justice Alliance
Independent Staff Union (staff of NTEU)
Indivisible
International Federation of Professional and Technical Engineers (IFPTE)
Labor Council for Latin American Advancement
MDC
Minority Veterans of America
MomsRising
MoveOn
MPower Change Action Fund
NAACP
National Action Network
National Association of Consumer Bankruptcy Attorneys (NACBA)
National Association of Pediatric Nurse Practitioners
National Association of Secondary School Principals (NASSP)
National Association of Social Workers
National Association of Student Loan Lawyers
National Black Gay Men's Advocacy Coalition
National Black Justice Coalition
National Center for Law and Economic Justice
National Coalition for the Homeless, Bring America Home NOW Campaign
National Consumers League
National Council of Asian Pacific Americans
National Disability Institute
National Education Association
National League for Nursing
National Nurses United

National Organization for Women Foundation
National Young Farmers Coalition
Opportunity Youth United
Our Revolution
Our Turn
People Power United
People's Action
Presente.org
Public Citizen
Public Counsel
Public Good Law Center
Rise
RootsAction.org
Rural Coalition
Secular Student Alliance
Service Employees International Union (SEIU)
Social Security Works
Student Borrower Protection Center
Student Debt Crisis Center
Student Veterans of America
Supermajority
The Autistic People of Color Fund
The Campaign for College Opportunity
The Hope Center at Temple University
The Leadership Conference on Civil and Human Rights
The Restaurant Opportunities Center United (ROC United)
UnidosUS
United Auto Workers
We the 45 Million
Women Advancing Nutrition Dietetics and Agriculture (WANDA)
Young Invincibles

State Organizations

AFGE Local 704
AFT Washington
AKPIRG
Alabama State Association of Cooperatives
American Federation of Teachers - New Mexico
ARISE

Arizona Students' Association
CAMEO Network
CASH Campaign of Maryland
CFT - A Union of Educators and Classified Professionals
Church Women United in New York State
Colorado Fiscal Institute
Community Legal Aid Society Inc. (Delaware)
Community Service Society of New York
Connecticut Citizen Action Group
E5 Enterprise
Economic Action Maryland
Generation Up
Georgia Budget and Policy Institute
GRACE - End Child Poverty CA
Hawaii State Teachers Association
Indivisible Marin
Labor Network for Sustainability
Maine Center for Economic Policy
Maine Education Association
Maryland Center for Collegiate Financial Wellness
Mountain State Justice, Inc.
National Association of Social Workers DC Metro Chapter
National Association of Social Workers, Alabama Chapter
National Association of Social Workers, Alaska Chapter
National Association of Social Workers, Arizona Chapter
National Association of Social Workers, Arkansas Chapter
National Association of Social Workers, California Chapter
National Association of Social Workers, Colorado Chapter
National Association of Social Workers, Connecticut Chapter
National Association of Social Workers, Delaware Chapter
National Association of Social Workers, Florida Chapter
National Association of Social Workers, Georgia Chapter
National Association of Social Workers, Guam Chapter
National Association of Social Workers, Hawaii Chapter
National Association of Social Workers, Idaho Chapter
National Association of Social Workers, Illinois Chapter
National Association of Social Workers, Indiana Chapter
National Association of Social Workers, Iowa Chapter
National Association of Social Workers, Kansas Chapter
National Association of Social Workers, Kentucky Chapter

National Association of Social Workers, Louisiana Chapter
National Association of Social Workers, Maine Chapter
National Association of Social Workers, Maryland Chapter
National Association of Social Workers, Massachusetts Chapter
National Association of Social Workers, Michigan Chapter
National Association of Social Workers, Minnesota Chapter
National Association of Social Workers, Mississippi Chapter
National Association of Social Workers, Missouri Chapter
National Association of Social Workers, Montana Chapter
National Association of Social Workers, Nebraska Chapter
National Association of Social Workers, Nevada Chapter
National Association of Social Workers, New Hampshire Chapter
National Association of Social Workers, New Jersey Chapter
National Association of Social Workers, New Mexico Chapter
National Association of Social Workers, New York City Chapter
National Association of Social Workers, New York State Chapter
National Association of Social Workers, North Carolina Chapter
National Association of Social Workers, North Dakota Chapter
National Association of Social Workers, Ohio Chapter
National Association of Social Workers, Oklahoma Chapter
National Association of Social Workers, Oregon Chapter
National Association of Social Workers, Pennsylvania Chapter
National Association of Social Workers, Puerto Rico Chapter
National Association of Social Workers, Rhode Island Chapter
National Association of Social Workers, South Carolina Chapter
National Association of Social Workers, South Dakota Chapter
National Association of Social Workers, Tennessee Chapter
National Association of Social Workers, Texas Chapter
National Association of Social Workers, Utah Chapter
National Association of Social Workers, Vermont Chapter
National Association of Social Workers, Virgin Islands Chapter
National Association of Social Workers, Virginia Chapter
National Association of Social Workers, Washington Chapter
National Association of Social Workers, West Virginia Chapter
National Association of Social Workers, Wisconsin Chapter
National Association of Social Workers, Wyoming Chapter
National Council of Jewish Women-PA
New Era Colorado
New Hampshire Youth Movement
New Jersey Association of Mental Health and Addiction Agencies, Inc.

New Jersey Citizen Action
New Jersey Institute for Social Justice
New Mexico Center on Law and Poverty
NextGen California
NTS Group, CEA, EOF, USCAN, CO Dem. Party - Energy & Environ. Initiative, Super Cap
LLC
Ohio Student Association
Oregon Student Association
Passengers United
Progress Virginia
Progressive Leadership Alliance of Nevada
Public Justice Center
Quiet Creek Herb Farm & School of Country Living
RAISE Texas
Rural Advancement Fund of the National Sharecroppers Fund, Inc.
SEIU Local 500
South Carolina Legal Justice Center
Student Loan Fund
Students Engaged in Advancing Texas (SEAT)
Students United
The Collaborative of NC
The Freedom BLOC
The National Association for Social Workers-New York State and New York City
THE ONE LESS FOUNDATION
Towards Justice
UC-AFT Local 1474
United Campus Workers Arizona, CWA Local 7065
United University Professions
United Vision for Idaho
University of California Student Association (UCSA)
Vermont-NEA
Virginia Poverty Law Center
Washington Education Association
Wisconsin Education Association Council
Women Employed
WV Citizen Action

Local Organizations

Action Together NEPA

AFT Local 604
Albuquerque Teachers Federation
Alief American Federation of Teachers and School Employees
Association of Legal Aid Attorneys (UAW Local 2325)
Bastrop Federation of Teachers
Civil Service Bar Association
Colchester Federation of Teachers Local 1807
College Now Greater Cleveland
Fayetteville Police Accountability Community Taskforce
Fresno Building Healthy Communities
Graduate and Professional Student Council, University of Arizona
Hartford Federation of Teachers
Houston Federation of Teachers #2415
Houston ISD
Inversant
La Raza Centro Legal, SF
LGBT Community Center of Greater Cleveland
little listeners of the Carolina / LLOTC
Massachusetts State College Association
Miami Valley Fair Housing Center
Old Town Teachers Organization, Local 909
Professional Staff Union, MTA/NEA
Psja Aft
San Antonio Alliance of Teachers and Support Personnel
San Francisco Rising
Southern California College Attainment Network
UIC United Faculty, AFT-AAUP Local 6456
Venice Resistance
Western Massachusetts Area Labor Federation, AFL-CIO