

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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American Federation of Teachers,  
555 New Jersey Ave. N.W.  
Washington DC 20001-2079

Civil Action No.1-:25-cv-00802-RBW

Judge Reggie B. Walton

Plaintiff,

v.

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

**DECLARATION OF DR. CARLY  
BAETZ IN SUPPORT OF  
PLAINTIFF'S MOTION FOR A  
TEMPORARY RESTRAINING ORDER**

Linda McMahon, in her official  
capacity as Secretary of Education,  
400 Maryland Avenue, SW  
Washington, DC 20202

Defendants.

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I, DR. CARLY BAETZ, hereby declare as follows:

1. I am above the age of 18 and have personal knowledge of the facts set forth in this Declaration.

2. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order.

3. I currently owe \$80,660.37 on multiple federal student loans, which include both consolidated and unconsolidated Direct Loans.

4. I took out my first loan in 1998 to attend American University. I then took out more debt to go to law school at the University of Florida in 2004.

5. I moved to New York where I practiced as a public defender before deciding to get my PhD in psychology at City University of New York. After receiving my PhD, I was a clinical psychologist working with youth involved in the juvenile justice system.

6. I am now an Associate Professor at a public university. My current work focuses on treating justice-involved youth with histories of trauma exposure, conducting research on the implementation of trauma-informed practices in the juvenile justice system, and providing trauma-informed training and consultation to juvenile justice professionals.

7. I never pursued a well paying job in private practice or with big law, both because of my passion for juvenile justice, but also because of the assurance that I would be able to take care of my loans through the Public Service Loan Forgiveness program.

8. While I was already making payments in one of the other income-driven repayment plans, I chose to switch to the SAVE repayment plan when it became available.

9. I am now stuck in the SAVE Forbearance and am not able to count the time in my current employment towards PSLF.

10. I called the Department of Education and was told that I could not make payments on my loans.

11. But for the SAVE forbearance, I would be on track to have nearly half of my loans forgiven in May, and the remainder forgiven this fall.

12. Because of the uncertainty in the student loan system and to figure out what steps I needed to take to preserve my eligibility for PSLF, I reached out to an attorney to discuss my student loan options on March 7, 2025.

13. I was told that I would need to change into a different income-driven repayment plan in order to make payments that would count towards PSLF. However, I have not been able to

apply for a different repayment plan because the application is no longer available on studentaid.gov.

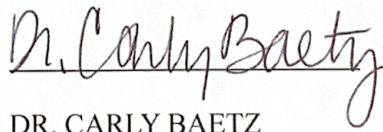
14. Before the SAVE repayment plan became unavailable, I finally felt hopeful and believed that I might actually get my loans forgiven.

15. This debt impacts me every day. I have a two and a half year old son and I worry about being able to provide for his health and education. This debt impacts the choices my family makes every day and the risks that my family is willing to take. I would like to buy a better home for my family to live in which I cannot do with this debt.

16. The uncertainty of this situation is causing me a great deal of anxiety. I don't know how much longer I will need to make payments on this debt. I am unable to budget or make financial plans for the future.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24 2025.



DR. CARLY BAETZ

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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American Federation of Teachers,  
555 New Jersey Ave. N.W.  
Washington DC 20001-2079

Civil Action No. 1:25-cv-00802-RBW

Judge Reggie B. Walton

Plaintiff,

v.

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

Linda McMahon, in her official  
capacity as Secretary of Education,  
400 Maryland Avenue, SW  
Washington, DC 20202

Defendants.

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**DECLARATION OF RACHEL  
DUBREUIL IN SUPPORT OF  
PLAINTIFF'S MOTION FOR A  
TEMPORARY RESTRAINING ORDER**

I, RACHEL DUBREUIL, hereby declare as follows:

1. I am a member of the American Federation of Teachers union, Plaintiff in the above-captioned matter. I am above the age of 18 and have personal knowledge of the facts set forth in this Declaration.

2. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order.

3. I hold a master's degree in international relations, a master's degree in teaching, and a graduate certificate in international education.

4. I have accumulated a total of \$88,159.56 in federal student loan debt to pay for my educational experiences.

5. I have been a teacher for a total of twelve years. I currently teach 11th and 12th grade Social Studies at Norwich Technical High School. I have been teaching at Norwich for the last ten years.

6. For the past ten years, I have been making payments under the Income-Based Repayment (“IBR”) plan in pursuit of Public Service Loan Forgiveness (“PSLF”).

7. As a teacher, I rely on access to IBR to make my monthly federal student loan payments more affordable.

8. I also rely on the promise of PSLF to provide me with a pathway to forgiveness after making 120 qualifying payments and qualifying work, which I have worked hard to keep track of since I began my career.

9. When the Saving on a Valuable Education (“SAVE”) plan was announced, I switched repayment plans to make my payments much more affordable. On the SAVE plan, my payments were \$350.10 a month.

10. By July 2024, I had made 115 qualifying payments, and most of my loans, exactly \$78,907.74, were on track to be forgiven in November 2024.

11. Also, in July 2024, my loans were abruptly placed in the SAVE forbearance. I was initially told by my servicer that I would receive credit for the months in the SAVE forbearance, however, that was false. I have not received credit for any months since July 2024, and my forgiveness continues to be delayed.

12. I applied for the PSLF Buyback program on December 6, 2024, and was told I would hear back about a decision in 45 business days. As of March 2025, I have not heard anything about my application from my servicer.

13. I have continued to make payments in the amount of \$350.10 almost every month while in the SAVE forbearance so that I do not lose credit towards PSLF once the system restarts. I missed a payment in September 2024 because of the confusion surrounding whether or not that month would count as part of the forbearance.

14. In January 2025, I submitted an Income-Driven Repayment plan application to switch repayment plans, so that I could continue to make payments to receive forgiveness, but my application has been stuck in review.

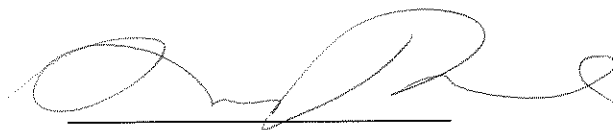
15. Every month I spend in this forbearance delays my forgiveness, thus delaying freedom from my student loan debt, and affording me an opportunity to live a better life. The weight of my student loan debt has felt like a ball and chain and impacts every life decision that I make.

16. Because of my student loan debt, my husband and I have been unable to save for retirement. We have not been able to contribute to our daughter's college savings fund so that she is not saddled with debt in the same way. We have also not been able to afford higher life insurance policies that would benefit our daughter if something were to happen to us.

17. If my loans are not forgiven through PSLF, I will not be able to afford to pay them off with a teacher's salary, and I will be forever tethered to this debt.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 21, 2025.

A handwritten signature in black ink, appearing to read 'Rachel Dubreuil', written over a horizontal line.

RACHEL DUBREUIL

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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American Federation of Teachers,

Civil Action No. 1:25-cv-00802-RBW

Plaintiff,

v.

**DECLARATION OF COREY MASON  
IN SUPPORT OF PLAINTIFF'S  
MOTION FOR A TEMPORARY  
RESTRAINING ORDER**

U.S. Department of Education et al,

Defendants.

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I, Corey Mason, hereby declare as follows:

1. I am a member of the American Federation of Teachers, Plaintiff in the above-captioned matter. I am above the age of 18 and have personal knowledge of the facts set forth in this Declaration.

2. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order.

3. I teach English language development to high school students at a trade school in Connecticut, and I have 11 years of teaching experience.

4. I have earned a Bachelor's degree in English Language and Education, a Masters degree in Teaching English to Speakers of Other Languages, and a Sixth-Year credential in Reading. I took out student debt to pay for all three of my educational experiences.

5. I borrowed approximately \$65,908 in total. I currently owe \$78,476.89 in federal student loans, of which \$75,926.52 is principal, despite the fact that I have consistently made payments on my loans.

6. I had one private student loan, which I have paid off.

7. As a teacher, I rely on access to income-driven repayment plans to make my monthly federal student loan payments affordable.

8. I also rely on Public Service Loan Forgiveness and the promise that my student loans will be forgiven after 120 qualifying payments and qualifying work.

9. I have always opted for income-driven repayment plans to make my monthly payments affordable to me on a teacher's salary. After the Saving for A Valuable Education (SAVE) income-driven repayment plan was announced during the summer of 2023, my loans were automatically enrolled in the SAVE plan. My total monthly payments under the SAVE plan were \$364. I am enrolled in autopay, and \$364 was debited from my account every month.

10. In June 2024, I noticed that my payment was not taken out of my account. I checked my account and learned that my loans had been placed into a forbearance. This forbearance time would not count toward Public Service Loan Forgiveness. I immediately called my student loan servicer, MOHELA, and asked to be transferred to a plan that would qualify. The customer service representative told me that I could not move to another plan.

11. After speaking with the MOHELA representative, I began to make manual payments of \$364 on my loans, in the hope that these months would be counted toward my Public Service Loan Forgiveness time.

12. According to my account with StudentAid.gov, I have 117 of the 120 credits needed for Public Service Loan Forgiveness. This does not reflect any of the time or payments that I have made since my loan was placed in forbearance in June 2024. I should have accrued the three remaining credits by August 2024, at which point I should have had my loans forgiven.

13. In November 2024, I filed a reconsideration request to have my months in the SAVE forbearance count toward Public Service Loan Forgiveness through the Department of Education's



“Buy Back” program. I was told it would take 45 days to process. I have regularly inquired about the status of the request and have been told alternately that it will take an additional 45 days or that there is no specific timeframe for a determination. I have since submitted two more reconsideration requests, the latest of which was in February 2025. I have not heard back from any of them.

14. In November 2024, I also submitted a general Public Service Loan Forgiveness form, seeking credit for the months since June 2024.

15. In December 2024 or January 2025, I spoke with a MOHELA representative about my options and was told that the only way I could leave the income-driven repayment plans and take my loans out of forbearance was by enrolling in the standard repayment plan, which would result in monthly payments of about \$900. The representative could not confirm that these payments would count toward Public Service Loan Forgiveness. I could not afford to make \$900 monthly payments indefinitely, and so did not switch to the standard plan. Instead, on or around January 17, I submitted an application for the Income Based Repayment plan, which I understood was not part of the SAVE forbearance. That application is still pending.

16. My student loans are a major financial burden for me. For years I was not able to save money because of my student loans. Making my student loan payments has always been a priority to me, since I am pursuing Public Service Loan Forgiveness and do not want to miss any credit toward forgiveness. I have had to accrue credit card debt to pay for regular household expenses and necessities. At times I have skipped out on basic necessities, including heating my home, to reduce my expenses, but I have always paid my loans when they are due. I need a new car, but cannot afford one. The little savings that I did have I used to pay off my private student loan, since it would not be eligible for Public Service Loan Forgiveness.

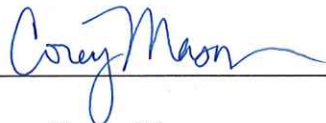
17. With the current uncertainty about the future of the Social Security program, I am worried about my retirement finances, since I have not been able to privately save. Given the current administration's call to end the U.S. Department of Education, I am worried how that will affect my job as a teacher. The fact that I still have my loans, even though I believe they should already have been forgiven under Public Service Loan Forgiveness, adds to this stress and financial uncertainty.

18. I am engaged to be married, but wanted to have my student loan debt forgiven before marrying and expected this would occur in the fall of 2024. Because I have not been able to accrue more credit toward Public Service Loan Forgiveness, I am stressed at the prospect of bringing my debt into my marriage.

19. I cannot afford to make payments that are not based on my income, and I cannot afford to continue making payments on my student loans for longer than the 120 payments I had planned for under the Public Service Loan Forgiveness program. I have started to consider filing bankruptcy as a way to handle my debt if these programs are no longer available.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 21, 2025.

A handwritten signature in blue ink that reads "Corey Mason". The signature is written in a cursive style and is positioned above a horizontal line.

Corey Mason

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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American Federation of Teachers,  
555 New Jersey Ave. N.W.  
Washington DC 20001-2079

Plaintiff,

v.

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

Linda McMahon, in her official  
capacity as Secretary of Education,  
400 Maryland Avenue, SW  
Washington, DC 20202

Defendants.

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Civil Action No.1-:25-cv-00802-RBW

Judge Reggie B. Walton

**DECLARATION OF DR. PICOLYA  
MCCALL-ROBINSON IN SUPPORT  
OF PLAINTIFF'S MOTION FOR A  
TEMPORARY RESTRAINING  
ORDER**

I, DR. PICOLYA MCCALL-ROBINSON, hereby declare as follows:

1. I am a member of the American Federation of Teachers union, Plaintiff in the above captioned matter. I am above the age of 18 and have personal knowledge of the facts set forth in this Declaration.
2. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order.
3. I began pursuing a higher education in 1999 at California State University-Dominguez Hills. Upon graduation, I had accumulated approximately \$1,000 in federal student loan debt.
4. I completed my master's degree program around 2009–2010. Upon graduation, I had accumulated approximately \$20,000-\$30,000 more in federal student loan debt.
5. I went on to earn my doctorate in 2014. Upon completion, I had accumulated an

additional \$100,000 in federal student loan debt. In July 2017, I consolidated my student loan debt.

6. For the last decade, I have worked as an adjunct teacher at Southwest and East Los Angeles Colleges, as well as other schools. I also work with hospitals, nursing facilities, and assisted living facilities to provide mental health services.

7. As a teacher, I have relied upon the Income-Driven Repayment (“IDR”) plans program to make affordable payments on these loans. I was enrolled in the Revised Pay as You Earn (“REPAYE”) plan, which made my payments more affordable.

8. When the Saving on a Valuable Education (“SAVE”) plan was announced, I was automatically enrolled in it. As an adjunct teacher, being on the SAVE plan was going to be much more affordable for me, and would allow me to continue making progress toward Public Service Loan Forgiveness (“PSLF”), while also being able to afford a comfortable living.

9. Although I have been making consistent payments, as of March 2025, my student loan debt has exploded to over \$580,000, so payments under the Standard Repayment Plan would be unaffordable.

10. I was told that if I worked hard, pursued higher education, and dedicated my life to public service, I would have my loans forgiven after ten years of affordable payments. That has not been the case.

11. As an adjunct teacher, my employment did not qualify for the PSLF program until recent improvements were made to the program. Since then, I have been able to count my time and get that much closer to forgiveness.

12. I have consistently turned in my PSLF forms to track my progress toward forgiveness. I submitted my last PSLF form in November 2024, but it has not been processed.

13. I was on track to have my loans forgiven in November 2024, but that was ripped away in July 2024 when my payments were placed in forbearance after the court decision. Since then, I have been unable to make qualifying payments, and I was told that the months in forbearance would not count towards PSLF.

14. I submitted an application to switch to a different IDR plan in December 2024, but the application has continued to process without any update. I tried again in February 2025 but was unable to submit an application at all. I have not heard from my servicer or been provided with any follow-up.

15. My student loan debt has held me hostage for over 25 years now. Every decision I make, such as buying a home or taking a new job in another country, is tethered to my student loans.


16. In 2020, I attempted to buy a home for myself and my children but was denied because of my student debt.

17. I was also considered for an exciting teaching job in New Zealand, but because of my student loan debt, the school would not offer me the job. I was heartbroken to miss out on such an amazing opportunity for my career.

18. If forgiveness is delayed, it will continue to prevent me from building a better life for myself and my children. The emotional anguish will be too much to bear because I am unable to chase the “American Dream” I was promised if I did everything right.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 21, 2025.

A handwritten signature in blue ink, consisting of a large, stylized initial 'P' followed by a series of connected loops and a horizontal line at the end.

DR. PICOLYA MCCALL-ROBINSON

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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American Federation of Teachers,  
555 New Jersey Ave. N.W.  
Washington DC 20001-2079

Civil Action No.1-:25-cv-00802-RBW

Judge Reggie B. Walton

Plaintiff,

v.

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

**DECLARATION OF TAMMY SABENS  
IN SUPPORT OF PLAINTIFF'S  
MOTION FOR A TEMPORARY  
RESTRAINING ORDER**

Linda McMahon, in her official  
capacity as Secretary of Education,  
400 Maryland Avenue, SW  
Washington, DC 20202

Defendants.

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I, TAMMY SABENS, hereby declare as follows:

1. I am above the age of 18 and have personal knowledge of the facts set forth in this Declaration.

2. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order.

3. I am a 64 and a half year old grandmother living in Kentucky.

4. I originally borrowed federal student loans to go to college in the 1980s. Although most of that debt has since been repaid or cancelled, I went back to school in 2002 to get a nursing degree. At the time, I was 46 years old and a single parent making very little money. I knew a woman through my church who was a nurse and thought that as a nurse I could make a difference while providing a better life for my two kids. I completed my nursing degree in 2006.

5. I originally borrowed \$24,970.96 to attend my nursing program, but because of capitalized interest, my federal student loan balance is now over \$51,848.98.

6. I have worked as a nurse for over 18 years and, though I was laid off three times, I have done my best to keep up with the payments.

7. At the beginning of the pandemic, I caught COVID-19 and developed long-COVID. I have also had to battle cancer. My only source of income for several years was short-term disability. Because of my health issues, my doctor advised me to retire.

8. I applied for social security retirement payments in December 2024 and started receiving social security in February 2025.

9. Now my only source of income is my \$1,486 social security payment.

10. Prior to getting sick, I was paying my loans on the income-based repayment plan. Due to my health issues, I was on a deferment that just expired. I had a payment due on March 21, 2025, for \$390.65 which is unaffordable on my current income.

11. I called my loan servicer, Nelnet, to explain that I could not afford to pay \$390.65. The customer service representative told me that I had used up all of my deferment options, and because the applications are blocked, I cannot adjust my income-based repayment amount. Instead he put me in a temporary two month forbearance. Based upon my current income, I estimate that my payment amount would be \$0 per month and that time would count towards forgiveness under the income-based repayment plan.

12. While my loans are in this temporary forbearance, the unpaid interest on my loan is continuing to grow and I am not making progress on my loans.

13. Because the income-driven repayment plan application is unavailable, I cannot adjust my monthly payment to reflect my current income.



14. All I wanted to do is get a college degree and make a decent living. I chose to be a nurse to help people and have saved many lives over my 18-year career. But it has taken a huge toll on me physically and mentally.

15. If I had known I would never be able to repay these loans, I do not know if I would make the same choice again.

16. My loan situation is causing me a great deal of distress. I feel like my only option is to default on my loans. I can't sleep over it. I have anxiety. And I get panic attacks. I don't know what to do.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 2025.

A handwritten signature in black ink, appearing to read "Tammy Sabens", written over a horizontal line.

TAMMY SABENS

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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American Federation of Teachers,  
  
Plaintiff,

Civil Action No. 1:25-cv-00802-RBW

v.

U.S. Department of Education et al,  
  
Defendants.

**DECLARATION OF SARAH  
TAMMELLEO IN SUPPORT OF  
PLAINTIFF'S MOTION FOR A  
TEMPORARY RESTRAINING ORDER**

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I, Sarah Tammelleo, hereby declare as follows:

1. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order.

2. I am the Senior Director of Research, Strategic Initiatives and Economic Security for the American Federation of Teachers ("AFT"). I am over the age of 18 and have personal knowledge of the facts set forth in this Declaration.

3. AFT is a membership organization representing 1.8 million pre-K through 12th-grade teachers, early childhood educators, paraprofessionals, and other school-related personnel; higher education faculty and professional staff; federal, state, and local government employees; and nurses and other healthcare professionals.

4. AFT's mission is to promote fairness, democracy, economic opportunity, and high-quality public education, healthcare, and public services for students, their families and communities. It meets this mission by ensuring its members receive fair pay and benefits for their critical work, and by fighting for safe working conditions that also benefit students, patients, and all those who use public services. Helping children and students, and ensuring the economic security and dignity of AFT's members and their families, is at the core of this mission

5. AFT takes a leading role in fighting for the financial stability of public service, education, and health care workers, particularly when it comes to the increasingly crippling costs of education.

6. In my role as Senior Director, I manage our national economic security program, which includes support for members with student loans.

7. This work is critical to meeting our mission. Based on our internal data, and conversations with members, we know that many of our AFT's members have student loan debt and 75% of our members work in roles that are eligible for public service loan forgiveness.

8. Thousands of AFT's members have previous access and/or are eligible for the Income-Based Repayment Plan, the Income-Contingent Repayment Plan, the Pay as You Earn Plan, and the Revised Pay as You Earn Plan.

9. The Student Debt Clinic is the American Federation of Teacher's member education and engagement program for student loan borrowers within our membership. It was created with three goals in mind: (1) to educate our members about Income-Driven Repayment and Public Service Loan Forgiveness ("PSLF"), programs which, when utilized together, can lead to monthly savings on student loan payments and can lead to the discharge of the remaining balance after 120 payments while working for at least 30 hours a week in public service; (2) to create a core of trained activists who would be able to conduct student debt clinics within their affiliates and serve as "first responders" to members' questions about student debt through our Train-the-Trainer program; and (3) to provide affiliates with a program that engaged their members on an issue that was important to them and create an on-ramp for further engagement and activism within their union.

10. Since August 2016, we have recorded 940 student Debt Clinic events (both clinics and Train-the-Trainers) that have had over 26,000 people register.

11. After attending a Debt Clinic, members require follow-up support which often requires a forensic investigation of the borrower's loan disposition.

12. Thanks to a close relationship with the Office of the Federal Student Aid Ombudsperson, we were often able to find solutions that allowed long-time borrowers to ensure that their time in public service counted towards forgiveness. However, since March 11, 2025, those employees are no longer employed at the Department of Education and we are left without a significant resource to help our members.

13. The estimated time commitment for AFT staff in running the debt clinic program is 2.5 Full Time Employees (FTE). In total, AFT has dedicated tens of thousands of dollars and over two thousand hours of valuable staff time toward helping its members with their student loans. These resources could have been used for other work that the union undertakes, such as collective bargaining; retirement security; healthcare; student learning conditions; and educators', public employees' and healthcare workers' working conditions, but our members have made it clear that they need help with their student loans.

14. On February 21, 2025, I became aware that a banner appeared on studentaid.gov informing borrowers that they could no longer apply for any income driven repayment plan.

15. A true and accurate copy of the website with the banner is attached as Exhibit A.

16. On February 28, 2025, I became aware through the Washington Post article, *It Could Be Months Before Affordable Student Loan Repayment Plans Return*, by Danielle Douglas-Gabriel, that the Department of Education had sent a Stop Work Order to its servicers and they are no longer processing existing IDR applications.

17. Since the Department of Education stopped accepting and processing IDR applications, my team and I have received numerous concerning messages and requests for assistance from AFT members.

18. One member shared she is concerned that if she does not have access to IDR and PSLF, she will default on her loans or will be required to file bankruptcy.

19. Another member shared that she delayed having a baby because of her student debt and only just had a baby because she is close to receiving PSLF forgiveness. Now, with access to PSLF blocked, she is worried that she cannot save for childcare or her baby's future because of her loans. Because of her experience, she plans to discourage her child from going to college and taking out debt.

20. Another member said that she is retiring this spring after a career in teaching, but her student loan payments just increased and she cannot lower them using IDR; her student loan payments are currently higher than her mortgage payments, and her debt-to-income ratio is preventing her from refinancing her mortgage.

21. One member, a public school teacher, shared that she is a single parent, and is already struggling to provide for her children's basic needs. She said her student loans are crushing her and that she relies on programs like IDR and PSLF, which she believes are made to help people like her.

22. My staff and I have received and reviewed numerous stories like these.

23. As a result of this information, and in response to outreach that we have received from our members, I have spent a significant amount of time, reprioritizing my work and spending half—approximately 80 hours— of my time supervising staff, updating clinic materials, supporting member-activist trainers in understanding the new material, and supporting borrowers who are trying to understand how to navigate the system that has grown more complex or who are rightfully concerned that paperwork filed months ago that should have led to their loans being forgiven have not been processed.

24. This additional workload has put significant strain on me and other staff at AFT who have been unable to appropriately support members, meet deadlines for deliverables related to other economic security programs, collective bargaining, and research.

25. The AFT is committed to expanding economic security programs for members and was developing a new financial literacy clinic curriculum to help members. The program development has been delayed due to the actions of the Department and the need to reallocate resources away from that program to meet the new demand from members with student debt.

26. The AFT was preparing to end a multi-year contract with a technology company called Summer which provides direct services to members with student debt. Due to the uncertainty and lack of communication from the Department, AFT staff have had a significant increase in communication from members seeking help. AFT has been unable to educate and advise members and the union has had to reallocate resources totaling \$250,000.00 and extend the contract through June 2026.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 23, 2025.

A handwritten signature in black ink, appearing to read "Sarah Tammelleo", written over a horizontal line.

Sarah Tammelleo

# **EXHIBIT A**

## Income-Driven Repayment (IDR) Plan Request

Apply for a new income-driven repayment (IDR) plan or recertify an existing IDR plan on this page. IDR plans often provide a lower monthly payment compared to other plans because they are based on your income and family size rather than your loan amount. If your situation changes, you have options, including having your IDR plan recalculated or switching to a new IDR plan.

If you have parent PLUS loans, you must [consolidate your loans](#) to become eligible for an IDR plan.



### Application Unavailable

A federal court issued an injunction preventing the U.S. Department of Education from implementing the Saving on a Valuable Education (SAVE) Plan and parts of other income-driven repayment (IDR) plans. As a result, the IDR and online loan consolidation applications are temporarily unavailable. Borrowers can still [submit a paper loan consolidation application](#).

### New IDR Applicants



#### Apply for an Income-Driven Repayment Plan

There are four different IDR plans to choose from. Our loan estimator can help you compare IDR plans to see which is best for your situation.

[Learn more about IDR plans](#)

[Log In to Start](#)

[View Demo](#)

OMB No. 1845-1012 • Form Approved