



April 29, 2025

U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue S.W.
Washington, D.C. 20202

Oral Comment RE: [Intent To Receive Public Feedback for the Development of Proposed Regulations and Establish Negotiated Rulemaking Committee](#)

[3 min]

Good afternoon. My name is Persis Yu and I am the deputy executive director and managing counsel of the Student Borrower Protection Center.

We stand in strong opposition to the Trump Administration's attempts to implement Project 2025, which calls for gutting Income-Driven Repayment (IDR) options and eliminating Public Service Loan Forgiveness. Let's be clear, the Trump Administration's assault on IDR and PSLF isn't reform—it's retaliation. These actions would force nurses, teachers, veterans, and others who have dedicated their careers to serve our communities, to choose between paying their monthly student loan bills... and putting food on their tables. Borrowers everywhere would be driven further into debt, while relief is pushed further out of reach.

Congress passed the Income-Contingent Repayment statute with a clear goal: to prevent student debt from becoming a life sentence. Despite attempts by right-wing groups to rewrite history, it is clear that Congress intended ICR to include cancellation after no more than 25 years. For 30 years, administrations of both parties have refined protections to help keep borrowers out of delinquency, default, and lifetimes of debt.

But, for too long, government mismanagement and student loan industry abuses made existing IDR options more of a debt trap—allowing balances to balloon and failing to provide the financial relief borrowers needed.

These historic failures led the Biden Administration to create the Saving on a Valuable Education (SAVE) plan. I proudly served as the primary legal aid negotiator on the negotiated rulemaking



committee, which created the SAVE plan. During those negotiations, borrowers provided heartbreaking testimony about the inability to afford their rent, pay for critical medical care, and cover other basic necessities.

The resulting SAVE plan, which proponents of Project 2025 claim is too generous, was pegged to an amount that would reduce food insecurity. It would have cut monthly payments in half for many borrowers, protected borrowers from runaway balances, and expedited debt relief for borrowers with low balances.

Student loan delinquencies are now skyrocketing, with roughly 4 million Americans behind on their student loan payments. Instead of defending affordable repayment options, this Administration has forced millions to remain in economic limbo.

As millions of borrowers face a looming default cliff, this administration plans to start ripping vital Social Security benefits from millions of seniors and borrowers with disabilities. Instead of helping the millions of borrowers who have been failed by the broken student loan system—it's eliminating what few safeguards exist to help them.

Instead of strengthening PSLF and ensuring public service workers get the relief they are entitled to, this administration plans to illegally weaponize PSLF in order to punish public service workers employed at organizations engaging in work that is not in line with President Trump's agenda. These efforts will ultimately threaten critical public service fields and harm our most vulnerable communities.

For these reasons, we strongly oppose any effort that would force working families to pay even more on their monthly student loan bills and deprive borrowers of critical cancellation.

Thank you,

Persis Yu
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Student Borrower Protection Center