

May 5, 2025

James Bergeron
Acting Under Secretary
United States Department of Education
400 Maryland Avenue SW
Washington, DC 20003

RE: Intent To Receive Public Feedback for the Development of Proposed Regulations and Establish Negotiated Rulemaking Committee [Docket ID ED-2025-OPE-0016]

Dear Acting Secretary Bergeron,

On behalf of AASA, The School Superintendents Association, representing more than 10,000 public school superintendents across the country, we write in strong support of the Public Service Loan Forgiveness Program (PSLF) as a critical tool for educator recruitment and retention. As the Department of Education (Department) begins the process of negotiated rulemaking, we urge you to protect and expand the program.

According to the latest National Principal and Teacher Surveyⁱ, roughly 1.3 million teachers are repaying student loans and nearly one third (about 11.5% of all teachers) still owe their entire balance. The cost of higher education creates a significant financial burden for educators whose average salaries are about 27% less than other college graduatesⁱⁱ.

The federal government has limited options to support the recruitment and retention of educators. Alleviating the financial burden of student loans—particularly through the PSLF program—is a proven strategy for keeping highly-qualified teachers in the classroom.

While other federal programs exist to address the cost of higher education for educators – such as the TEACH grant service scholarship (TEACH) and Teacher Loan Forgiveness (TLF) Program – these programs only provide limited relief. TEACH provides up to \$12,000 for undergraduate students pursuing education and TLF provides between \$5,000 to \$17,500 depending on the subject taught. These amounts are not an effective incentive for prospective teachers when the average debt is \$55,800ⁱⁱⁱ. Additionally, TEACH and TLF are limited to teachers who work in high-need schools. High-need schools are historically the hardest to staff and teachers in these systems should receive higher incentives to remain. However, schools across the country are facing severe shortages of highly-qualified educators and PSLF is the only federal program available to all educators.

The Department must continue to strengthen and uphold this program to ensure all eligible public servants receive the loan forgiveness they were promised. Specifically, we urge the Department to:

- Streamline the application and verification processes to reduce administrative burden on applicants and employers
- Maintain a broad definition of qualifying employment that includes all public schools serving students across the country
- Ensure consistent treatment of borrowers by preventing bureaucratic changes or administrative errors from obstructing loan forgiveness following years of public service

Additionally, PSLF works because repayment plans are affordable and accessible. Income driven repayment (IDR) allows teachers the ability to repay their student loans on a scale adjusted to their income and continue to work in their communities. This is critical to ensure continued loan payments with public sector salaries. In order for PSLF to be effective, IDR must remain an option.

Talented, motivated, and highly effective educators and school leaders are essential to student success. Investing in their growth, success, and support is one of the most important steps we can take to secure the future of our nation. Thank you for the opportunity to provide comment on this important topic. We welcome the opportunity to work with the Department to optimize PSLF and ensure its accessible for all eligible educators.

Sincerely,

Tara Thomas

Tara Thomas
Government Affairs Manager

¹Learning Policy Institute analysis of the National Teacher and Principal Survey, 2020-21. Learning Policy Institute. 2023.

<https://learningpolicyinstitute.org/product/student-loans-among-teachers-brief>

²Sylvia Allegretto. "Teacher pay rises in 2023—but not enough to shrink pay gap with other college graduates". Economic Policy Institute. 2024. <https://www.epi.org/publication/teacher-pay-in-2023/>

³National Education Association. "Student Loan Debt Among Educators". 2021. <https://www.nea.org/sites/default/files/2021-07/Student%20Loan%20Debt%20among%20Educators.pdf>