

May 5, 2025  
Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue SW, 5th Floor  
Washington, DC 20202

*Submitted via regulations.gov*

**Re: Comments to Department of Education in response to Intent to Receive Public Feedback for the Development of Proposed Regulations and Establish Negotiated Rulemaking Committee; Docket ID ED-2025-OPE-0016**

The National Association of Social Workers appreciates the opportunity to comment in response to the Department of Education’s announcement of its intent to establish a negotiated-rulemaking process to make changes to, among other programs, the Public Service Loan Forgiveness program.

Founded in 1955, NASW is the largest membership organization of professional social workers in the United States. NASW has 102,000 members and works to enhance the professional growth and development of its members, to create and maintain professional standards, and to advance sound social policies.

NASW objects to any regulations that would narrow the definition of a “qualifying employer” for the purpose of determining PSLF eligibility. The PSLF program enables borrowers, including NASW’s members—many of whom otherwise carry unsustainable debt burdens—to enter public service careers and carry out critically important work for the public good. Meaningful student debt relief, including through access to the PSLF program, is essential to ensure a strong and plentiful social work workforce and to keep the profession financially accessible. Restricting the program would make it difficult for NASW’s members to provide important services to populations in need and for NASW itself to fulfill its mission.

***1. Social workers provide an essential public service.***

There are over 700,000 professional social workers nationwide and they are one of the largest providers of mental, behavioral, and social care services in the United States. Social workers are licensed and credentialed at the Bachelor’s, Master’s, Doctorate, and PhD levels. Roughly 250,000 are licensed clinical social workers, who are required to have a Master’s degree and licensure to practice independently. Social workers help people cope with and solve a wide variety of problems in their everyday lives. They are found in every facet of community life, including schools, hospitals, behavioral health clinics, senior centers, prisons, child welfare and juvenile services, the military, corporations, courts, private practice, elected office, and in numerous public and private agencies. Social workers provide urgently needed mental health and behavioral health services and help clients who have a disability or face a life-threatening disease or a social problem, such as inadequate housing or unemployment. Social workers serve on crisis response teams and assist victims of violence. They also

assist families that have serious domestic conflicts, involving child abuse and neglect and or spousal abuse. They work with immigrant populations and LGBTQ+ people. Social workers conduct research, advocate for improved services, engage in systems design, manage non-profits, or are involved in planning or policy development. Social workers provide these critically needed services to millions of Americans every day.

Many social workers specialize in serving a particular population or working in a specific setting in non-profits and the public sector. Some examples include:

- *Aging*: Social workers link older adults with services that help them live independently and with dignity, thereby maximizing their quality of life and participation in society. In 2022, 31.9 million women and 25.9 million men were age 65 and above. People aged 65 and above represented 17.3% of the population in 2022.<sup>1</sup> Social work with older adults focuses on the physical, psychological, social, and economic aspects of daily living.
- *Child Welfare*: Child welfare social workers serve some of the most vulnerable children, youth, and families. Social workers specialize in building on the strengths of families and helping them to provide a safe and nurturing environment for children and youth. However, when families are unable to do this, social workers must intervene to reduce risk and protect children from harm. An estimated 558,899 children (unique incidents) were victims of abuse and neglect in the U.S. in 2022.<sup>2</sup> Child welfare social workers ensure that children and youth who have experienced abuse or neglect are supported through a range of services.
- *Health Care*: Health care social workers help people deal with personal and social factors that affect health and wellness. Some health care social workers are in direct services and concentrate on individuals, families, and small groups. Others work in settings where the focus is on planning, administration, and policy. In the health care setting, social workers may conduct research, develop programs, and administer departments. Social workers are critical to meeting the needs of social determinants of health.
- *Schools*: Social workers in schools provide mental health and behavioral health services to students and an array of other services that support student health, wellbeing and academic achievement. These social workers often run groups, work on attendance issues, address student hunger and homelessness. They may also assist with students who have disabilities and or require Individual Education Plans. Social workers in schools assist students in maximizing their academic potential by meeting their social and emotional needs.
- *Mental Health and Substance Use Disorder Services*: Clinical social workers focus on assessment, diagnosis, treatment and prevention of mental health and behavioral health conditions, including substance use disorders. Clinical social workers are essential to a number of client-centered settings and can be found in private practice, agencies and other

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<sup>1</sup> See Admin. for Community Living, U.S. Dep't of Health & Hum. Servs., *2023 Profile of Older Americans 4* (May 2024), <https://perma.cc/X7K2-MEYX>.

<sup>2</sup> See Nat'l Children's All., *National Statistics on Child Abuse*, <https://perma.cc/4Q22-HKYF> (last accessed May 1, 2025).

community-based settings. Social workers have the requisite training and expertise to assist individuals with mental health and substance use disorders live their best lives.

## **2. *Student debt is a substantial barrier to entry for social workers who want to go into public service.***

Total outstanding federal student debt in the United States now exceeds \$1.7 trillion<sup>3</sup> among more than 42 million borrowers.<sup>4</sup> Student loans are a tremendous barrier for people seeking employment in public service jobs, where salaries are persistently low compared to private sector jobs. That is true for social workers.

Social workers tend to have high student debt, but relatively low pay, making participation in the profession financially difficult, particularly in the non-profit and public sectors. The disparity between debt and compensation is exacerbated by the level of education required to practice in the field. While social workers can work in certain settings with a Bachelor's degree, a Master's of Social Work (MSW) is the terminal degree required to practice in many settings including independent clinical social work. Social workers who obtain a MSW carry a mean total student debt of \$67,000,<sup>5</sup> but the mean starting salary for social workers with MSWs is just \$47,100.<sup>6</sup>

Disparities between student debt undertaken and salaries mean that many borrowers may forgo public service jobs altogether because they cannot otherwise cover all living expenses, including their student debt. The result is severe workforce shortages in the nonprofit sector.<sup>7</sup> Indeed, nonprofit organizations consistently report that salary competition is the single largest factor harming their ability to attract and retain employees.<sup>8</sup> This trend, too, has played out in the social work profession.

The demand for social workers is expected to increase substantially—by more than twice the average expected for all occupations—over the coming years.<sup>9</sup> Demand for all categories of social workers are expected to grow faster than average, with particularly rapid growth in the need for healthcare social workers and mental health and substance use disorder social workers.<sup>10</sup>

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<sup>3</sup> Melanie Hanson, *Student Loan Debt Statistics*, Education Data Initiative (updated Mar. 16, 2025), <https://perma.cc/6TRR-RJ9U>; see also Adam Looney & Constantine Yannelis, *What Went Wrong with Federal Student Loans?*, Brookings (2024), <https://perma.cc/Z4KN-ZVXR> (from 2000 to 2020, the number of borrowers with student debt went from 21 million to 45 million, and the total amount owed “quadrupled from \$387 billion to \$1.8 trillion”).

<sup>4</sup> *Id.*

<sup>5</sup> Edward Salsberg et al., *The Social Work Profession: Findings from Three Years of Surveys of New Social Workers*, NASW 12 (Aug. 2020), <https://perma.cc/5ZM2-QZ6L>.

<sup>6</sup> *Id.*

<sup>7</sup> See Nat'l Council of Nonprofits, *2023 Nonprofit Workforce Survey Results: Communities Suffer as Nonprofit Workforce Shortage Crisis Continues* 3-4 (2023), <https://perma.cc/7NDN-27LG>; Ctr. For Effective Philanthropy, *State of Nonprofits in 2023: What Funders Need to Know* (2023), <https://perma.cc/9KZB-856A>.

<sup>8</sup> Nat'l Council of Nonprofits, *supra* note 5, at 10.

<sup>9</sup> See Bureau of Labor Stats., U.S. Dep't of Labor, *Occupational Outlook Handbook—Social Workers*, <https://www.bls.gov/ooh/community-and-social-service/social-workers.htm> (last accessed April 30, 2025).

<sup>10</sup> *Id.*; see also Michael Rieley, U.S. Bureau of Labor Stats., *Beyond the Numbers: Projected Employment Growth for Community and Social Service Occupations, 2022-32* (Feb. 2024), <https://www.bls.gov/opub/btn/volume-13/projected-employment-growth-for-community-and-social-service.htm> (demand for healthcare social workers projected to grow 9.6% from 2022 to 2032).

We are already facing a lack of qualified social workers.<sup>11</sup> For example, almost all child welfare programs struggle with recruiting and retaining qualified and effective child welfare staff, and turnover rates remain high.<sup>12</sup> Educational institutions are not on pace to meet the expected increase in need. While enrollment in social work education shows modest growth, this upward trend is insufficient to meet the corresponding anticipated increase in demand for qualified social workers.<sup>13</sup>

The consequences of attrition and difficulties recruiting can be dire for the populations for whom social workers provide care and services—reduction or elimination of services and longer waiting times mean that people in need have less access to healthcare, child welfare services, violence prevention, education assistance, and so much more, including for people with disabilities, LGBTQ+ people, people of color, and other vulnerable communities.<sup>14</sup> Individuals may be denied services that they so desperately need.

Hence, federal investments in social work and social work education are critically needed to ensure that there is a sufficient supply of social workers to meet evolving demands.

### ***3. The PSLF program was designed to help people enter public service employment.***

Fortunately, Congress, with bipartisan support, enacted the PSLF program (as part of the College Cost Reduction and Access Act)<sup>15</sup> to encourage entry for a wide range of public service professions, including social work.

As the legislative history around the passage of the Act shows, the program was designed to support those who want “to work in a variety of areas that are extraordinarily important for our country and for our society,”<sup>16</sup> including those in “emergency management, public safety, . . . public education, early childhood education, childcare, public health and social work in public service agencies, public services for individuals with disabilities and the elderly, public interest legal services, public defenders, school librarians, school-based service providers, teaching full-time at a tribal college or university.”<sup>17</sup> And that enumerated list of employers was “not exclusive, it is inclusive.”<sup>18</sup> As Senator Edward Kennedy explained at the time, “we have made this as wide as we could in terms of trying to respond to the sense that is out there in our schools and colleges, . . . to say: Look, if you want to give something back, we are going to make it possible.”<sup>19</sup>

Some argue that taxpayers should not have to take on the burden of another person’s educational debt. PSLF is not a loan cancellation program. Participants in the program need to pay off their debt for at least 10 years before they can qualify for loan forgiveness. The PSLF program benefits communities by helping dedicated professionals use their educational background and training to meet the needs of their community.

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<sup>11</sup> Columbia School of Social Work, *Bridging the Gap: The Urgent Need for Social Workers* (Sept. 29, 2023), <https://socialwork.columbia.edu/news/bridging-gap-urgent-need-social-workers> (reporting an expected deficit of 74,000 social workers annually over the next decade).

<sup>12</sup> Nat’l Child Welfare Workforce Inst., *Critical Workforce Needs* (Dec. 2020), <https://perma.cc/TY6M-LS7W> (noting turnover rates between 20 to 50 percent nationally).

<sup>13</sup> Ryan Bradshaw, Council on Social Work Educ., *Spring 2021 CSWE Member Pulse Survey Results* (2021), <https://perma.cc/M4CR-FZPV>.

<sup>14</sup> See, e.g., Nat’l Council of Nonprofits, *supra* note 5, at 5-8.

<sup>15</sup> See Pub. L. 110-84, 121 Stat. 784 (2007).

<sup>16</sup> 153 Cong. Rec. S9448 (daily ed. July 17, 2007) (statement of Sen. Bernie Sanders).

<sup>17</sup> *Id.* at S9462 (statement of Sen. Edward Kennedy).

<sup>18</sup> *Id.*

<sup>19</sup> See 153 Cong. Rec. S9536 (daily ed. July 19, 2007) (statement of Sen. Edward Kennedy).

As Congress envisioned, PSLF is a vitally important government program that eases the student debt burden for those who choose public service professions. Together with other federal financial assistance programs, the PSLF program helps to bridge the income gap between public service and private employment to make public service a feasible career path. As of October 2024, more than a million borrowers have had more than \$70 billion in student debt discharged through the program.<sup>20</sup> And PSLF has proven to be an important recruitment and retention tool for public service employers, as the Department itself has recognized.<sup>21</sup>

#### ***4. Losing access to the PSLF program would harm NASW, its members, and the people and communities they serve.***

NASW’s members are employed in jobs that qualify them for participation in the PSLF program. Many of NASW’s members provide services—or work for healthcare providers, hospitals, schools, governmental entities, or other employers that provide services—related to a number of the topics targeted in President Trump’s recent executive for disqualifying individuals and employers from participation in PSLF, “Restoring Public Service Loan Forgiveness.”<sup>22</sup> Social workers, for example, provide therapy services, diagnoses of gender dysphoria, and approvals needed for hormone therapy, including therapy for minors. They offer diversity support programs. And they provide counseling, case management, and other services for immigrant populations. The threat of or actual loss of PSLF eligibility as a result of carrying out, or working for an employer who carries out, activities that fall under the topics referenced in the executive order would cause immediate, serious, and lasting harm to communities, social workers, and the agencies they work for.

As described above, sustainable careers in social work depend on access to the PSLF program. Should NASW’s members lose access to the program, many of them will not be able to afford to make their required monthly student loan payments while remaining in their current positions. And our members must grapple with that decision *now*, as they consider whether to seek or accept new employment, to apply for or enroll in an MSW program, or make any number of other decisions related to their education or employment.

The threat or actual loss of the PSLF program will frustrate NASW’s ability to advance the profession by encouraging the sustainable growth of the profession and impede its ability to advocate for sound social policies. Ultimately, those harms trickle down to the populations that NASW’s members serve, including some of the most vulnerable members of society.

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NASW strongly opposes any effort by the Department to undermine the PSLF program. Such attempts would contravene Congress’s intent in establishing the program, sow chaos and confusion for the millions of borrowers participating in the program—not to mention the millions more relying on its continued existence as they make

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<sup>20</sup> See Council of Econ. Advisors, *Making Public Service Loan Forgiveness Work for Borrowers and the American People*, White House (Oct. 17, 2024), <https://perma.cc/L62V-GXEW>.

<sup>21</sup> See U.S. Dep’t of Educ., Fed. Student Aid, *Tackling the Public Service Loan Forgiveness Form: Employer Tips*, <https://perma.cc/DS3F-3RDM> (accessed Apr. 24, 2025) (Department resource for employers instructing that, “While [PSLF] is a potentially life-changing benefit for your employee, it’s also an opportunity for you. You can use your eligibility as a qualifying employer for the PSLF . . . program[ ] as a recruitment tool to attract highly qualified employees to your organization); Julie Burrell, Coll. & Univ. Professional Ass’n for Human Resources, *Public Service Loan Forgiveness: Help Employees Achieve Their Financial Goals*, The Higher Ed Workplace Blog (Sept. 17, 2024), <https://perma.cc/S9H6-E5BP> (noting that human resources can use the PSLF program “as part of a retention and recruitment strategy” and that it is “an especially attractive benefit to potential employees”).

<sup>22</sup> Executive Order 14,235, “Restoring Public Service Loan Forgiveness,” 90 Fed. Reg. 11,885 (Mar. 7, 2025).

decisions regarding higher education enrollment and employment—and, ultimately, harm the public service organizations that provide critical services for the benefit of the American people.

Should you have any questions about this comment, please feel free to contact Dina Kastner, Public Policy and Advocacy Manager at NASW, at [dkastner.nasw@socialworkers.org](mailto:dkastner.nasw@socialworkers.org) or (202) 336-8218.

Respectfully submitted,

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

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National Association of Social Workers