



September 17, 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 the Proposed
Rulemaking; Docket ID ED-2025-OPE-0016**

The National Association of Social Workers (NASW) appreciates the opportunity to submit this comment in response to the U.S. Department of Education's (ED) Notice of Proposed Rulemaking (NPRM)—which implements President Trump's Executive Order 14235¹ by limiting borrowers' ability to receive Public Service Loan Forgiveness (PSLF). In giving the Education Secretary the power to determine whether employers, including government agencies and nonprofits, are involved in activities that are deemed illegal or go against Administration policy, the Department improperly circumscribes the scope of the PSLF program from all 501(c)(3) nonprofit organizations or domestic government entities to only those organizations or entities who engage in activities the Executive Branch endorses.

Founded in 1955, NASW is the largest membership organization of professional social workers in the United States. NASW has 93,000 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 the proposed rule, which would allow the Secretary of Education to jeopardize the financial and professional lives of millions of borrowers, including many social workers. The proposed rule would expand the Secretary's control over borrowers' participation in the PSLF program far beyond the Secretary's expertise and congressional authorization.

The PSLF program is a crucial investment in the nation's public service workforce. 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. Federal student debt relief, including through the PSLF program, is essential to ensure a strong social work workforce and keep it financially accessible to individuals in the future. In the wake of a mental health crisis, social workers and other mental health professionals are needed now more than ever. Restricting the program would make it difficult for

¹ See White House Presidential Actions, *Restoring Public Service Loan Forgiveness* (March 2025), <https://www.whitehouse.gov/presidential-actions/2025/03/restoring-public-service-loan-forgiveness/>

NASW's members to provide important services to populations in need and for NASW itself to fulfill its mission.

Social workers provide an essential public service.

Social work is one of the fastest growing professions in the United States. There are over 700,000 professional social workers nationwide and that number is expected to grow to 800,000 by 2033. Without PSLF, the future growth of the social work profession as well as nursing, law, and teaching will be in jeopardy as this loan forgiveness program helps borrowers to take crucial jobs in high-need areas to provide critical services in communities. Social workers are one of the largest providers of mental, behavioral, and social care services in the United States, and many 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.

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. The U.S. population of older adults grew five times faster than the total population over the last 100 years, according to the U.S. Census Bureau. People aged 65 and above represented 17.3% of the population in 2022.² 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. According to the Child Maltreatment report of 2023, 3,081,715 children received investigation or an alternative

² 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>.

response from child protective services.³ 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. Over 185,000 social workers work in hospitals, nursing care facilities, outpatient care centers, scientific research and development services, and more healthcare adjacent facilities. They also provide home health care services. In the health care setting, social workers may serve clients, conduct research, develop programs, and administer departments. Social workers look at individuals holistically, taking each part of their life into consideration. This means that the critical role social workers play meets a myriad of needs for each client.
- *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, and address student hunger and homelessness. They may also assist 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 several client-centered settings and can be found in private practice, agencies, and other community-based settings. According to the Centers for Disease Control and Prevention⁴, drug overdose deaths in the U.S. have decreased by nearly 30 percent, and that is projected to continue to drop. This decrease is due in large part to investment in mental health programs⁵ that are facilitated by professionals—including social workers—who have the

³ See Admin. on Children, Youth, and Families, Administration for Children and Families *Child Maltreatment 2023 Report* (January 2025), <https://acf.gov/cb/data-research/child-maltreatment>

⁴ *U.S. overdose deaths decrease almost 27% in 2024.* (2025, May 14). CDC National Center for Health Statistics. Retrieved August 25, 2025, from https://www.cdc.gov/nchs/pressroom/nchs_press_releases/2025/20250514.htm

⁵ Trust for America's Health. (2025, May 27). Deaths Due to Drug Overdose and Alcohol Are Down Nationally, But Progress is Uneven Across Population Groups and at Risk Due to Cuts in Federal Health Programs - TFAH. TFAH. <https://www.tfah.org/article/deaths-due-to-drug-overdose-and-alcohol-are-down-nationally-but-progress-is-uneven-across-population-groups-and-at-risk-due-to-cuts-in-federal-health-programs/>

requisite training and expertise to assist individuals with mental health and substance use disorders live their best lives.

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 trillion⁶ among more than 43 million borrowers.⁷ 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 \$67,000,⁸ but the mean starting salary for social workers with MSWs is just \$47,100.⁹

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.¹⁰ Indeed, nonprofit organizations consistently report that salary competition is the single largest factor harming their ability to attract and retain employees.¹¹ This trend, too, has played out in the social work profession.

⁶ 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”).

⁷ *Id.*

⁸ 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>.

⁹ *Id.*

¹⁰ 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>.

¹¹ Nat'l Council of Nonprofits, *supra* note 5, at 10.

The demand for social workers is expected to increase substantially—by more than twice the average expected for all occupations—over the coming years.¹² Demand for all categories of social workers is 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.¹³

We are already facing a lack of qualified social workers.¹⁴ For example, almost all child welfare programs struggle with recruiting and retaining qualified and effective child welfare staff, and turnover rates remain high.¹⁵ 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.¹⁶

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.¹⁷ Individuals may be denied services that they so desperately need which means individuals, families, and communities lose access to the programs that keep them alive, families lose services from programs that work to keep them together, and communities are no longer protected from targeted interference from predatory private student loan companies or future government oversight.

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.

¹² 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).

¹³ *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).

¹⁴ 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).

¹⁵ 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).

¹⁶ Ryan Bradshaw, Council on Social Work Educ., *Spring 2021 CSWE Member Pulse Survey Results* (2021), <https://perma.cc/M4CR-FZPV>.

¹⁷ See, e.g., Nat’l Council of Nonprofits, *supra* note 5, at 5-8.

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)¹⁸ 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,”¹⁹ 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.”²⁰ And that enumerated list of employers was “not exclusive, it is inclusive.”²¹ 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.”²²

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.

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.²³ And PSLF has proven to be an important recruitment and retention tool for public service employers, as the Department itself has recognized.²⁴

¹⁸ See Pub. L. 110-84, 121 Stat. 784 (2007).

¹⁹ 153 Cong. Rec. S9448 (daily ed. July 17, 2007) (statement of Sen. Bernie Sanders).

²⁰ *Id.* at S9462 (statement of Sen. Edward Kennedy).

²¹ *Id.*

²² See 153 Cong. Rec. S9536 (daily ed. July 19, 2007) (statement of Sen. Edward Kennedy).

²³ 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>.

²⁴ 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

Granting broad authority to the Secretary of Education to revoke PSLF program eligibility from public service employers weaponizes a program meant to mutually benefit highly trained individuals and communities with great need.

In bypassing Congress and flouting the Constitution, the NPRM would harm millions of borrowers across the country, as well as the communities of which they are a part. The concentration of decision-making power in the wake of the destabilization and understaffing of the Department of Education²⁵ is a continuation of the Administration's attempts to punish individuals who have relied on the federal government for financial support. This proposed rule intimidates organizations and agencies into abiding by the administration's agenda or risking losing the ability to support their communities. The NPRM provides pressure to abandon the work that conflicts with the President's agenda or lose the ability to support our most marginalized communities.

The rule could allow the Department to disqualify employers from PSLF solely for engaging in conduct that is contrary to the Administration preference. And the limited process that the NPRM contemplates for employers that the Department seeks to disqualify is woefully inadequate.

The Department could base its allegations or accusations of disqualifying activities on supposed violation of federal statutes or even base disqualification on other matters it does not identify or define, based on a weak "preponderance of evidence" standard.

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 access to 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,

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").

²⁵ See Press Release from Dept. of Education *U.S. Department of Education Initiates Reduction in Force* (March 11, 2025) <https://www.ed.gov/about/news/press-release/us-department-of-education-initiates-reduction-force>

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 this NPRM and the effort to provide the Secretary of the Department of Education with unilateral power to determine the eligibility of PSLF employers. Declaring an intent to undermine the PSLF program not only contradicts Congress's intent in establishing the program, but also creates chaos and confusion for the millions of borrowers participating in the program, and harms the symbiotic relationship between public service organizations that provide critical services to a myriad of people and the individuals who are able to serve thanks to this program.

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 or (202) 336-8218.

Respectfully submitted,

Barbara Bedney, PhD, MSW
Chief of Programs
National Association of Social Workers