



The Nonprofit Alliance appreciates the opportunity to offer comments to inform rulemaking regarding Public Service Loan Forgiveness (PSLF), specifically “refining definitions of a qualifying employer to determine eligibility.”

The Nonprofit Alliance (TNPA) is a unifying voice to promote, protect, and strengthen the nonprofit sector. Our membership includes more than 200 nonprofit organizations and 150 firms that work alongside nonprofits toward a shared purpose of public engagement and mission impact.

Congress recognized the importance of recruiting and retaining highly-qualified public service professionals when it enacted PSLF with bipartisan support during the George W. Bush Administration. PSLF is a critical investment in our nation’s public service workforce, with equitable access and qualified eligibility afforded to 501(c)(3) charitable organizations. Accordingly, we strongly oppose restricting or revoking eligibility for nonprofit organizations addressing issues that are not aligned with an administration’s policy priorities, as was suggested in the presidential action, “Restoring Public Service Loan Forgiveness.”

The effectiveness of the PSLF program would be severely undermined if each new administration were permitted to alter its parameters. Many dedicated professionals have made significant career decisions based on the consistent application of this law, often accepting lower compensation offered by nonprofit sector employers with the understanding that their public service commitment would eventually be recognized through loan forgiveness. Subjecting PSLF to administrative reinterpretation creates uncertainty for these individuals and the organizations that employ them

A nonprofit's bedrock strength lies in its ability to address community needs independent of political pressures. A reasonable and equitable approach is to preserve the current policy in which all 501(c)(3) organizations operating in compliance with established law remain eligible for participation. Creating categories of favored and disfavored charities based on shifting political priorities contradicts the program's fundamental purpose of broadly supporting public service.

Modifying the PSLF program eligibility could constitute a breach of good faith by the federal government toward individuals who pay off student debt through dedicated service at lower compensation than they could have earned elsewhere. Moreover, it will curtail nonprofit employment in the future, with far-reaching negative consequences for communities nationwide that depend on nonprofit services for education, healthcare, social services, and cultural enrichment.

**The Nonprofit Alliance**

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We appreciate the opportunity to contribute to the comments on PSLF eligibility. As representatives of the nonprofit sector that would be directly impacted by these changes, we offer our participation in any established working group to ensure the perspectives of affected organizations inform the regulatory process. We are committed to working constructively toward policies that strengthen both public service and the communities we all serve.

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