

Tamy Abernathy
U.S. Department of Education Office of Postsecondary Education
400 Maryland Ave. SW, 5th Floor, Washington, DC 20202

Dear Ms. Abernathy,

Thank you for the opportunity to provide comments on the proposed rule to amend to amend the regulations on the Public Service Loan Forgiveness (PSLF) program under 34 CFR 685.219.

Maine Association of Nonprofits (MANP) is Maine's largest network of organizations dedicated to the common good with more than 1,100 nonprofit members and 200 partners in government, business and philanthropy, representing every county in Maine and the full range of nonprofit missions and sizes. For over 30 years, MANP has championed, connected, and informed nonprofits across the country. Across Maine, charitable nonprofits provide vital services and are a key and necessary component of the economy, employing more people than the construction, finance, and manufacturing industries.

MANP strongly opposes any efforts by the Department to restrict which 501(c)(3) nonprofits are eligible employers under the PSLF program. Under the PSLF program, charitable nonprofit organizations are better able to attract and retain the high-performing workforce needed to achieve their missions and address pressing needs in their communities. PSLF helps ensure these vital institutions have the workforce to successfully and efficiently operate local food banks, serve veterans, assist domestic violence survivors, and provide financial literacy courses, among other activities. PSLF is a vital resource, especially given ongoing workforce shortages in the charitable nonprofit sector, and it must continue to be available to be utilized by all eligible 501(c)(3) organizations.

As a general principle, MANP organization strongly opposes any policy proposals which would result in dividing 501(c)(3) organizations based on subject matter and philosophy. The proposed rule and the limitations it would impose on which employers would be able to benefit from PSLF for their employees would have exactly that effect.

Nonprofit employees in Maine have relied on PSLF for shaping their career path since it was first instituted under President George W. Bush in 2007. This program has helped support communities and the nonprofits who support them, and has supported the local economy in our state by allowing Mainers to work in the career of their choice, but still afford to live in an increasingly expensive state.

We urge preservation of the current rule and maintaining PSLF qualification for all employers in the 501(c)(3) sector.

Thank you for considering this input as part of the rulemaking process.

Sincerely,
Jennifer Hutchins
Executive Director
Maine Association of Nonprofits