



September 17, 2025

James P. Bergeron  
Deputy Under Secretary  
Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

**Re: 2025 Negotiated Rulemaking; William D. Ford Federal Direct Loan (Direct Loan) Program [Docket ID ED-2025-OPE-0016]**

Dear Deputy Under Secretary Bergeron,

The American Association of Colleges of Nursing (AACN) appreciates the opportunity to comment on the William D. Ford Federal Direct Loan (Direct Loan) Program and the Department's proposal to amend the regulations implementing the Public Service Loan Forgiveness (PSLF) program. As the national voice for academic nursing, AACN represents more than 875 schools of nursing offering baccalaureate, graduate, and post-graduate programs at public and private universities nationwide, which engage more than 540,000 students and 53,500 faculty members.<sup>1</sup> Collectively, these institutions graduate Registered Nurses (RNs), Advanced Practice Registered Nurses (APRNs),<sup>2</sup> faculty, researchers, and frontline providers. AACN is committed to preparing a highly educated nursing workforce, strengthening the foundation of nursing science, and advancing innovative healthcare solutions.

As you are aware, the College Cost Reduction and Access Act of 2007 established the framework for what is now the PSLF program. Under this program, borrowers who commit to a decade of public service and make 120 qualifying loan payments can have the remainder of their federal student debt forgiven, with the goal of incentivizing college educated individuals to pursue a career in public service.<sup>3</sup> PSLF "effectively lowers the financial barriers that often deter skilled professionals from pursuing careers focused on the public good," particularly in areas such as healthcare and education, representing "an exceptionally cost-effective policy tool for addressing critical workforce challenges in public service sectors."<sup>4</sup>

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<sup>1</sup> About the American Association of Colleges of Nursing. Retrieved from: <https://www.aacnnursing.org/About-AACN>.

<sup>2</sup> APRNs include certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), clinical nurse specialists (CNSs) and nurse practitioners (NPs).

<sup>3</sup> H.R.2669 - College Cost Reduction and Access Act. Retrieved from: <https://www.congress.gov/bill/110th-congress/house-bill/2669>

<sup>4</sup> Taylor, Laurel. 2025. Economic Analysis: The Cost-Effectiveness of Public Service Loan Forgiveness (PSLF). Retrieved from: <https://www.ed.gov/media/document/candidly-economic-analysis-cost-effectiveness-of-pslf-submitted-laurel-taylor-110311.pdf>

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PSLF is a particularly important tool that expands access to, and encourages enrollment in, nursing education. In 2018, 38% of licensed RNs reported using federally assisted student loans as a source of financing for their education; by 2022 this figure had increased to 45%.<sup>5</sup> Additionally, in a survey of graduate nursing students, AACN found that 57% of respondents planned on using PSLF to defray the cost of their education.<sup>6</sup> Access to federally assisted student loans, in combination with PSLF, supports a strong nursing workforce, both now and in the future. This is especially crucial as our nation continues to face significant current and projected nursing shortages. AACN encourages the Department to safeguard the continued availability of the PSLF for all nurses and other healthcare professionals in finalizing this rulemaking.

The Bureau of Labor Statistics (BLS) estimates that an average of 194,500 openings for RNs are projected each year through 2033, representing 6% growth.<sup>7</sup> BLS further estimates an average of 31,900 openings for nurse anesthetists, nurse midwives, and nurse practitioners each year through 2033, representing 40% growth and significantly outpacing the 4% projected growth across all occupations.<sup>8</sup> AACN's own enrollment surveys have shown generally strong enrollment in entry-level baccalaureate nursing programs over the last decade.<sup>9</sup> Nevertheless, in order to sustain a robust nursing workforce, it is imperative that tools such as PSLF remain in place and available for future healthcare professionals.

PSLF plays a vital role in ensuring that dedicated nurses can pursue careers in public service without being overburdened by student debt; additionally, the availability of PSLF can serve to incentivize students to enter public service careers, providing quality healthcare in rural and underserved communities across the country.

With nurses serving in a variety of critical capacities across hospitals, community clinics, schools, and public health systems, PSLF should continue to recognize this range of service. The President's National Nurses Day message called for a "refocusing [of] Public Service Loan Forgiveness on its original intent of encouraging Americans to enter essential public service roles, such as nursing" in order to "inspire a new generation of Americans to pursue careers in vital public services, contributing to a healthier, stronger Nation."<sup>10</sup> Through a robust PSLF program, the Department can reaffirm its commitment to the frontline caregivers who provide indispensable care and promote public health nationwide.

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<sup>5</sup> NCHWA Nursing Workforce Dashboard. Retrieved from: <https://data.hrsa.gov/topics/health-workforce/nchwa/nursing-workforce-dashboard>

<sup>6</sup> AACN. 2017. The Numbers Behind the Degree: Financing Graduate Nursing Education. Retrieved from: [https://www.aacnnursing.org/Portals/42/Policy/PDF/Debt\\_Report.pdf](https://www.aacnnursing.org/Portals/42/Policy/PDF/Debt_Report.pdf)

<sup>7</sup> Bureau of Labor Statistics. Occupational Outlook Handbook, Registered Nurses, 2023-2033. Retrieved from: <https://www.bls.gov/ooh/healthcare/registered-nurses.htm#tab-6>

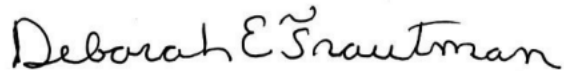
<sup>8</sup> Bureau of Labor Statistics. Occupational Outlook Handbook, Nurse Anesthetists, Nurse Midwives, And Nurse Practitioners, 2023-2033. Retrieved from: <https://www.bls.gov/ooh/healthcare/nurse-anesthetists-nurse-midwives-and-nurse-practitioners.htm#tab-6>

<sup>9</sup> AACN. Schools of Nursing Enrollment Increases Across Most Program Levels, Signaling Strong Interest in Nursing Careers. 2025. Retrieved from: <https://www.aacnnursing.org/news-data/all-news/article/schools-of-nursing-enrollment-increases-across-most-program-levels-signaling-strong-interest-in-nursing-careers>

<sup>10</sup> President Donald Trump. Message on National Nurses Day, 2025. Retrieved from: <https://www.whitehouse.gov/briefings-statements/2025/05/message-on-national-nurses-day-2025/>

Thank you for your consideration of AACN's comments in support of Public Service Loan Forgiveness for our nation's future nursing workforce. Maintaining a variety of tools that increase access to nursing education is critical to the optimal functioning of our healthcare system and necessary for supporting the future growth of the healthcare workforce. Please consider AACN an ally in this endeavor. If our organization can be of any assistance, please contact AACN's Director of Policy, Dr. Josh Adams at [jadams@aacnnursing.org](mailto:jadams@aacnnursing.org).

Sincerely,

A handwritten signature in black ink that reads "Deborah E. Trautman". The script is cursive and fluid, with the first name "Deborah" and last name "Trautman" clearly legible.

Deborah E. Trautman, PhD, RN, FAAN  
President and Chief Executive Officer