

Action Without Borders/ Idealist.org
African American Nonprofit Network
Alliance for Nonprofit Management
America's Second Harvest
American Assembly
American Association of State Colleges and Universities
American Humanics
AmeriCorps
Annie E. Casey Foundation
Arizona State University, Lodestar Center for Philanthropy and Nonprofit Innovation
Association of Fundraising Professionals
Association for Research on Nonprofit Organizations and Voluntary Action
Axelson Center for Nonprofit Management at North Park University
Boy Scouts of America
Bridgespan Group
Building Movement Project
Camp Fire USA
Campus Compact
Center for Community Change
Center on Philanthropy Indiana University
Child Welfare League of America
Commongood Careers
CompassPoint Nonprofit Services
Congressional Hispanic Caucus Institute
Coro Center for Civic Leadership
Craigslit Foundation
Echoing Green
Emerging Practitioners in Philanthropy
Freeman Philanthropic Services, LLC
Georgetown University Center for Public & Nonprofit Leadership
Girl Scouts of the USA
Girls Incorporated
Grand Valley State University, Center for Philanthropy and Nonprofit Leadership
The Humane Society of the United States
Institute for Higher Education Policy/Alliance for Equity in Higher Education
Interaction Institute for Social Change
Junior Achievement Worldwide
Kellogg Foundation
Learning for Life
Louisiana State University, Shreveport, Institute for Human Services and Public Policy
March of Dimes
Mary Reynolds Babcock Foundation
National 4-H Council
National Council of Nonprofit Associations
National Human Services Assembly
National Research Center for College and University Admissions
National Urban League
Neighbors for Better Neighborhoods
New Sector Alliance
Nonprofit HR Solutions
Nonprofit Oyster
OpportunityKnocks.org
Points of Light Institute
Project on Student Debt
Public Allies
Robert F. Kennedy Children's Action Corps, Inc.
Robert Morris University, Bayer Center for Nonprofit Management
South Carolina Fair Share
Transition Guides
UPS Foundation
United Way of America
University of Connecticut Program on Nonprofit Leadership and Strategic Networks
University of Missouri-Kansas City, Midwest Center for Nonprofit Leadership
University of San Diego, School of Leadership and Education Sciences, Nonprofit Initiatives
Volunteers of America
YMCA of the USA
Young Nonprofit Professionals Network
Young People for, People for the American Way

Nonprofit Workforce Coalition
A National Campaign to Recruit, Prepare, and Retain a Skilled and Diverse Next-Generation of Nonprofit Sector Leadership

July 29, 2008

Ms. Nikki Harris
U.S. Department of Education
1990 K Street, NW.
Room 8033
Washington, DC 20006-8502

Dear Ms. Harris,

I am writing on behalf of the Nonprofit Workforce Coalition to comment on Docket ID ED-2008-OPE-0009: the notice of proposed rulemaking to implement the Title IV loan provisions in the College Cost Reduction and Access Act of 2007 (CCRAA). Founded in 2006, the Nonprofit Workforce Coalition has quickly grown to nearly 70 organizations and become a national thought leader on nonprofit workforce issues. We are very pleased to see that Income Based Repayment has finally become a reality for it will have a tremendous impact on the nonprofit sector workforce. As our students graduate intending to enter the public service sector, many struggle in their new positions with rising costs of living and student loan repayments. CCRAA is an exciting program that could greatly assist our students as they seek to make an impact in their communities.

For our numerous nonprofit partners, affiliated universities, and students to benefit from these two programs as Congress intended, two major issues in the proposed rules must be resolved. The first would require some married borrowers to pay up to twice as much in Income Based Repayment (IBR) loan payments as unmarried borrowers in otherwise identical situations. When both spouses have student loans, they would be forced to choose between affordable loan payments through IBR and valuable tax benefits for married couples. This was not Congress' intent, and we urge you to fix this problem before the rules are finalized.

The second issue is with the proposed rules for Public Service Loan Forgiveness, which would require our partners and students to fully document 10 or more years of employment history *after the fact*, submit all that documentation to the Department, and simply hope for the best. This program was created by Congress to encourage people to make long-term commitments to serve their country and community in government and nonprofit jobs. Our partners and students need to know if their time in a particular job will count towards the required 10 years of public service so they can make well-informed career and financial decisions. Please provide a reliable system for our students and partners to confirm and track job eligibility within this program.

American Humanics also supports the comments submitted by the Project on Student Debt on July 14, 2008. We share their interest in ensuring that these important new programs are implemented fairly, efficiently, and effectively.

Thank you for your consideration.

Sincerely,



Stephen Bauer
Director, Initiative for Nonprofit Sector Careers
American Humanics