



September 9, 2025

Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Docket ID ED-2025-OPE-0016 Proposed Amendments to the Public Service Loan Forgiveness Program

To Whom It May Concern:

On behalf of the California Dental Association (CDA), representing 27,000 members throughout the state, I write to provide comments on the Department of Education's Notice of Proposed Rulemaking regarding the Public Service Loan Forgiveness (PSLF) program, published August 18, 2025 (90 Fed. Reg. 40154). I also address related student loan provisions enacted under the One Big Beautiful Bill Act (Pub. L. 119-21) that cap federal graduate borrowing and eliminate the Graduate PLUS program.

Concerns Regarding PSLF Employer Exclusions

The proposed rule would exclude PSLF eligibility from borrowers employed by organizations that engage in activities defined as having a "substantial illegal purpose." While intended to preserve program integrity, this definition risks unintended consequences for dentists working in nonprofit and public service roles, including the following two settings:

- Dentists employed at community health centers or nonprofit organizations could lose PSLF eligibility based on services or policies offered elsewhere within their organization, even if unrelated to dentistry.
- Dentists working in city or state oral health programs could similarly be affected if their jurisdiction or employer is deemed ineligible under the rule.

In both cases, these dentists are providing critical oral health care to underserved, rural and remote populations — patients who often lack any other access to dental care. Excluding them from PSLF not only penalizes providers for circumstances outside their control but also threatens the stability of oral health services in communities with the greatest need.

Concerns Regarding Loan Caps and Elimination of Grad PLUS

The Department's implementation of the OBBB Act's graduate loan limits, capping annual borrowing at \$50,000 (\$200,000 lifetime) and eliminating the Grad PLUS program effective July 1, 2026, will have profound consequences for dental education. The cost of

dental school routinely exceeds \$300,000, and federal loans are the primary financing mechanism for most students.

Critically, these provisions do not address the underlying problem: the high and rising cost of dental education. Imposing strict loan caps is a one-sided solution that fails to reduce tuition or operating costs at dental schools. Instead, it shifts the burden onto students, narrowing their financing options without offering meaningful relief on the price of education itself.

For many aspiring dentists, access to federal loans is the only pathway to professional education. By restricting this access, the policy threatens to turn dental education into an opportunity reserved for the few with substantial personal or family wealth. Rather than fostering affordability, the proposal risks imposing insurmountable barriers to the profession.

Without sufficient federal borrowing, future dental students will be forced into private loans with higher interest rates, variable terms and limited borrower protections. This shift will:

- Discourage qualified applicants from entering the dental profession, potentially reducing rather than increasing the health workforce.
- Exacerbate existing shortages of dental providers in Dental Health Professional Shortage Areas.
- Push graduates toward higher-paying positions or corporate practice models rather than service in rural areas, public health, or academia, all of which are already experiencing chronic workforce shortages.

In short, loan caps do not lower tuition, do not make education more affordable, and do not solve the systemic challenges of financing health professions education. Instead, they limit access, reduce choice, and threaten the pathway of providers who are essential to meeting the nation's oral health needs.

Recommendations

To ensure that federal loan policies continue to advance oral health equity, we respectfully urge the department to:

1. Reconsider or substantially narrow the PSLF employer exclusion to ensure dentists providing lawful, essential oral health services are not penalized based on unrelated services their employers may provide.
2. Prevent disruption of care by providing explicit safeguards for public health and nonprofit dental providers if local or state jurisdictions are deemed ineligible PSLF employers.

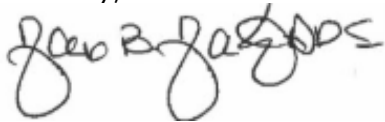
3. Study and publicly report on the impacts of graduate loan caps and the loss of Grad PLUS on dental school enrollment, tuition trends, private loan borrowing and workforce distribution, particularly in DHPSAs.
4. Explore alternative mechanisms to preserve access to affordable federal loans for dental students, including adjustments to lifetime loan caps or carve-outs for health professions education.

Dentistry is a critical component of the nation's health care system. The proposed PSLF restrictions and graduate loan limits, if implemented without modification, risk undermining access to care in precisely the communities PSLF was designed to serve.

We urge the department to modify the proposed rule to avoid these harms and to ensure federal loan policies continue to support, rather than hinder, the next generation of dentists.

Thank you for the opportunity to comment. CDA welcomes continued engagement with the Department of Education as it finalizes these important regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Max B. Martinez, DDS". The signature is stylized and cursive, with the letters "M", "B", and "M" being particularly prominent.

Max B. Martinez, DDS
President