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June 2, 2025

James P. Bergeron  
Acting Under Secretary  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, D.C. 20024

RE: Docket ID ED-2025-OPE-0016

Dear Acting Under Secretary Bergeron,

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States, we write in support of the nominations of Chavis Jones of the Lawyers' Committee for Civil Rights Under Law to represent the civil rights community and Jaylon Herbin of the Center for Responsible Lending to represent consumer advocates during the negotiated rulemaking noticed on April 3, 2025.

Given the considerable racial justice implications of the topics under consideration and broader implications for equity and equal opportunity during the upcoming negotiated rulemaking, it is of the utmost importance that highly qualified negotiators, such as Mr. Jones and Mr. Herbin, have extensive knowledge of programs authorized under Title IV of the Higher Education Act (HEA) and the ways in which students and borrowers of all backgrounds face barriers to affordable higher education. The voice of the civil rights community is critical in shaping policy on federal student loan programs and protecting the over 40 million student loan borrowers, who bear \$1.7 trillion in student debt, and are disproportionately Black, Latino, and women. There can be no greater contribution to the work of the rulemaking committee than those perspectives that are rooted in the foundation of ensuring that all students have equal access to the power of higher education.

**Chavis Jones** serves as Counsel in the Educational Opportunities Project of the Lawyers' Committee for Civil Rights Under Law. The Lawyers' Committee for Civil Rights Under Law is a national civil rights legal organization, founded by John F. Kennedy in 1963. The Educational Opportunities Project strives to guarantee that all students receive equal educational opportunities in public schools and institutions of higher learning. Mr. Jones has been a part of litigation related to both K-12 schools and litigation related to higher education issues including student debt and the predatory practices of some for-profit colleges and universities. Additionally, Mr. Jones has participated in coalitions related to

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student debt issues with other advocates across the country. In 2023, Mr. Jones co-authored a brief of the Lawyers' Committee for Civil Rights and 21 other advocacy organizations in *Biden v. Nebraska* and *Department of Education v. Brown*--two cases that went before the Supreme Court focused on the Biden Administration's federal student loan forgiveness plan.

Mr. Jones is a proud graduate of Morehouse College with a bachelor's degree in Philosophy. He earned a Master's of Divinity from Harvard Divinity School and focused on the intersection of religion, politics, and ethics. Lastly, he graduated from Duke Law School where he focused primarily on civil and human rights issues.

**Jaylon Herbin** is the Director of Federal Campaigns at the Center for Responsible Lending (CRL), a nonprofit, nonpartisan research and policy organization dedicated to protecting homeownership and family wealth by eliminating abusive financial practices. In this role, he leads CRL's federal advocacy strategy, with a particular focus on student loan reform and debt relief.

Mr. Herbin has been instrumental in advancing CRL's student loan work, including efforts to expand access to income-driven repayment plans, improve oversight of student loan servicers, and advocate for broad-based student debt cancellation. He works closely with policymakers, coalition partners, and stakeholders to promote policies that ensure equitable access to higher education and protect borrowers from predatory practices.

In 2021, Mr. Herbin served on the U.S. Department of Education's negotiated rulemaking committee on program integrity, contributing to regulatory discussions that shape the federal student loan system. Prior to joining CRL, he served as the district liaison for Congresswoman Alma Adams of North Carolina's 12th Congressional District, where he was responsible for stakeholder engagement and policy review through constituent services.

Mr. Herbin earned a B.A. in political science from Winston-Salem State University and is currently pursuing his Master of Public Administration at Wake Forest University.

In addition to considering these outstanding candidates, we urge the Department to distinguish seats for highly qualified experts representing:

- Civil rights organizations
- Consumer advocates
- Legal assistance organizations that represent students and/or borrowers.
- Student loan borrowers in repayment.
- Students with disabilities.
- Public institutions of higher education, including Historically Black Colleges and Universities, Tribal Colleges and Universities, and Minority-Serving Institutions (institutions of higher education eligible to receive Federal assistance under Title III, Parts A and F, and Title V of the HEA).
- Private nonprofit institutions of higher education including Historically Black Colleges and Universities, Tribal Colleges and Universities, and Minority-serving institutions (institutions of

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higher education eligible to receive Federal assistance under Title III, Parts A and F, and Title V of the HEA).

- Financial aid administrators at postsecondary institutions.
- Organizations representing taxpayers and the public interest.

As a civil rights organization dedicated to realizing the full participation of all students in higher education, it is essential that the civil rights community expertise informs the Department's decision-making. We urge the Department of Education, as a civil rights agency, to commit to the promise of higher education and consider these highly qualified, outstanding candidates. If you have any questions or need additional information, please contact Tania Valencia, higher education senior program manager at The Leadership Conference on Civil and Human Rights, at [valencia@civilrights.org](mailto:valencia@civilrights.org).

Sincerely,  
The Leadership Conference on Civil and Human Rights