

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

American Federation of Teachers,
555 New Jersey Ave. N.W.
Washington DC 20001-2079

Plaintiff,

v.

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

Linda McMahon, in her official
capacity as Secretary of Education,
400 Maryland Avenue, SW
Washington, DC 20202

Defendants.

Civil Action No.1-:25-cv-00802-RBW

Judge Reggie B. Walton

**DECLARATION OF DR. PICOLYA
MCCALL-ROBINSON IN SUPPORT
OF PLAINTIFF'S MOTION FOR A
TEMPORARY RESTRAINING
ORDER**

I, DR. PICOLYA MCCALL-ROBINSON, hereby declare as follows:

1. I am a member of the American Federation of Teachers union, Plaintiff in the above captioned matter. I am above the age of 18 and have personal knowledge of the facts set forth in this Declaration.
2. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order.
3. I began pursuing a higher education in 1999 at California State University-Dominguez Hills. Upon graduation, I had accumulated approximately \$1,000 in federal student loan debt.
4. I completed my master's degree program around 2009–2010. Upon graduation, I had accumulated approximately \$20,000-\$30,000 more in federal student loan debt.
5. I went on to earn my doctorate in 2014. Upon completion, I had accumulated an

additional \$100,000 in federal student loan debt. In July 2017, I consolidated my student loan debt.

6. For the last decade, I have worked as an adjunct teacher at Southwest and East Los Angeles Colleges, as well as other schools. I also work with hospitals, nursing facilities, and assisted living facilities to provide mental health services.

7. As a teacher, I have relied upon the Income-Driven Repayment (“IDR”) plans program to make affordable payments on these loans. I was enrolled in the Revised Pay as You Earn (“REPAYE”) plan, which made my payments more affordable.

8. When the Saving on a Valuable Education (“SAVE”) plan was announced, I was automatically enrolled in it. As an adjunct teacher, being on the SAVE plan was going to be much more affordable for me, and would allow me to continue making progress toward Public Service Loan Forgiveness (“PSLF”), while also being able to afford a comfortable living.

9. Although I have been making consistent payments, as of March 2025, my student loan debt has exploded to over \$580,000, so payments under the Standard Repayment Plan would be unaffordable.

10. I was told that if I worked hard, pursued higher education, and dedicated my life to public service, I would have my loans forgiven after ten years of affordable payments. That has not been the case.

11. As an adjunct teacher, my employment did not qualify for the PSLF program until recent improvements were made to the program. Since then, I have been able to count my time and get that much closer to forgiveness.

12. I have consistently turned in my PSLF forms to track my progress toward forgiveness. I submitted my last PSLF form in November 2024, but it has not been processed.

13. I was on track to have my loans forgiven in November 2024, but that was ripped away in July 2024 when my payments were placed in forbearance after the court decision. Since then, I have been unable to make qualifying payments, and I was told that the months in forbearance would not count towards PSLF.

14. I submitted an application to switch to a different IDR plan in December 2024, but the application has continued to process without any update. I tried again in February 2025 but was unable to submit an application at all. I have not heard from my servicer or been provided with any follow-up.

15. My student loan debt has held me hostage for over 25 years now. Every decision I make, such as buying a home or taking a new job in another country, is tethered to my student loans.


16. In 2020, I attempted to buy a home for myself and my children but was denied because of my student debt.

17. I was also considered for an exciting teaching job in New Zealand, but because of my student loan debt, the school would not offer me the job. I was heartbroken to miss out on such an amazing opportunity for my career.

18. If forgiveness is delayed, it will continue to prevent me from building a better life for myself and my children. The emotional anguish will be too much to bear because I am unable to chase the “American Dream” I was promised if I did everything right.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 21, 2025.

A handwritten signature in blue ink, consisting of a large, stylized initial 'P' followed by a series of connected loops and a horizontal line at the end.

DR. PICOLYA MCCALL-ROBINSON