

United States Senate

WASHINGTON, DC 20510

April 27, 2026

Geoffrey Gradler
Student Loan Ombudsman
Consumer Financial Protection Bureau
1700 G St. NW
Washington, DC 20552

Dear Mr. Gradler:

We write to request information on your priorities and plans as the Consumer Financial Protection Bureau's (CFPB's) new Student Loan Ombudsman.¹ In this role, you will lead the team responsible for helping resolve student loan borrowers' complaints about misconduct perpetuated by private student loan lenders and their servicers, compiling and analyzing data on those complaints, and making policy recommendations regarding private student loans.² We are concerned about your willingness to carry out this mission effectively, given your role in censoring the prior Student Loan Ombudsman's annual report, the Trump administration's alarming record of putting the interests of private lenders before those of student loan borrowers, and your background as a lobbyist for lenders and financial services firms.

The private student loan industry has a history of predatory behavior that raises costs for borrowers, which is particularly concerning given that the number of borrowers taking out private loans is set to significantly increase due to President Trump's *One Big Beautiful Bill Act* (OBBBA).³ Under the Biden administration, CFPB caught private lenders lying to borrowers about everything from autopay discounts to unemployment protections to the availability of debt cancellation.⁴ Private lenders have deceived borrowers about their bankruptcy rights, hired collectors who attempt to illegally collect on cancelled debts,⁵ denied borrowers access to debt cancellation that they are entitled to under federal law,⁶ and used fake statistics to market their

¹ Given CFPB's broad statutory authority to protect both private and federal student loan borrowers, both types of loans were placed under the Student Loan Ombudsman's purview under the Obama and Biden administrations. However, the Trump administration has reverted to using an earlier name for the position, Private Education Loan Ombudsman, suggesting that you may primarily be tasked with handling issues related to private student loans.

² 12 U.S.C. 5535.

³ Office of U.S. Senator Elizabeth Warren, "Costly Consequences: How the Trump Administration Unleashed Private Student Loan Lenders," February 2026, https://www.warren.senate.gov/imo/media/doc/final_-_private_student_loan_report_on_plan_to_profit_from_big_beautiful_bill.pdf.

⁴ Consumer Financial Protection Bureau, "Supervisory Highlights: Special Edition Student Lending," December 2024, p. 8, https://files.consumerfinance.gov/f/documents/cfpb_supervisory-highlights-special-ed-student-lending-issue-36-winter_2024-12.pdf.

⁵ Protect Borrowers, "SBPC Investigation Uncovers Decades-Long Student Loan Industry Scheme to Deprive Millions of Private Student Loan Borrowers of Bankruptcy Rights," press release, January 20, 2022, <https://protectborrowers.org/sbpc-investigation-uncovers-decades-long-student-loan-industry-scheme-to-deprive-millions-of-private-student-loan-borrowers-of-bankruptcy-rights/>.

⁶ Office of U.S. Senator Elizabeth Warren, "Congressional Investigation Reveals Navient May Be Improperly Denying Borrowers Relief from Predatory Student Loans," press release, December 12, 2024, <https://www.warren.senate.gov/newsroom/press-releases/congressional-investigation-reveals-navient-may-be>

loans.⁷ And now, because of OBBBA and its severe caps on federal loans, experts and private lenders alike expect that demand for private loans will surge.⁸ This will make your job more important than ever, as many private loan borrowers seek help from the CFPB when facing lender or servicer failures.⁹

However, we are concerned that you will follow the Trump administration's consistent playbook on private student loans: implementing policy after policy that benefits private lenders and their servicers at the expense of borrowers. First, President Trump has attempted to illegally shutter the CFPB entirely, despite its critical role in protecting borrowers from lender misconduct.¹⁰ Second, President Trump's CFPB declared it would "deprioritize" supervision and enforcement activities related to student loan issues.¹¹ Third, President Trump's CFPB ended multiple major enforcement actions against companies that had allegedly used illegal debt collection practices to cheat private student loan borrowers.¹² And finally, President Trump signed OBBBA into law, which significantly diminishes graduate students' and parents of undergraduate students' access to federal student loans, forcing working families into the private lending market.¹³ You have given no assurances that you will break this pattern and use your new role to protect borrowers from predatory private lenders.

In addition, your minimal experience in consumer protection and your past work as a lobbyist for lenders raise further doubt about your priorities. Before you joined CFPB in August 2025, you lobbied on behalf of lenders and financial services firms for over twenty years.¹⁴ In 2019, you

[improperly-denying-borrowers-relief-from-predatory-student-loans](#).

⁷ CNBC, "This company advertised student loan savings of more than \$20,000. That promise was misleading," Annie Nova, October 31, 2018, <https://www.cnbc.com/2018/10/31/a-popular-student-debt-lender-is-accused-of-misleading-borrowers.html>.

⁸ Office of U.S. Senator Elizabeth Warren, "Costly Consequences: How the Trump Administration Unleashed Private Student Loan Lenders," February 2026, https://www.warren.senate.gov/imo/media/doc/final_-_private_student_loan_report_on_plan_to_profit_from_big_beautiful_bill.pdf; National Association of Student Financial Aid Administrators, "Experts Discuss How New Loan Limits Will Impact Students," Maria Carrasco, October 16, 2025, https://www.nasfaa.org/news-item/37467/Experts_Discuss_How_New_Loan_Limits_Will_Impact_Students; Protect Borrowers, "Private Lenders Would Cash In on Congress's Student Loan Changes," Carolyn Fast and Ella Azoulay, May 20, 2025, <https://protectborrowers.org/private-lenders-would-cash-in-on-congress-student-loan-changes/>.

⁹ Consumer Financial Protection Bureau, "Annual Report of the CFPB Student Loan Ombudsman," October 2025, p. 10, https://prospect.org/wp-content/uploads/2026/01/2025-SL-Ombudsmans-Report_Final.pdf.

¹⁰ NPR, "The Trump administration has stopped work at the CFPB. Here's what the agency does," Joe Hernandez, February 10, 2025, <https://www.npr.org/2025/02/10/nx-s1-5292123/the-trump-administration-has-stopped-work-at-the-cfpb-heres-what-the-agency-does>; National Consumer Law Center, "Unlawful Shut Down of Consumer Agency Endangers Working Families, Honest Businesses, the Economy," press release, February 10, 2025, <https://www.nclc.org/unlawful-shut-down-of-consumer-agency-endangers-working-families-honest-businesses-the-economy/>.

¹¹ Tweet by Brian Schwartz, April 16, 2025, <https://x.com/schwartzbWSJ/status/1912633869255188512>.

¹² Protect Borrowers, "CFPB Drops Enforcement Action Against Predatory Student Loan Company," February 27, 2025, <https://protectborrowers.org/cfpb-drops-enforcement-action-against-predatory-student-loan-company/>; CNBC, "Trump administration drops CFPB lawsuit against National Collegiate Student Loan Trusts," Annie Nova, April 28, 2025, <https://www.cnbc.com/2025/04/28/trump-drops-cfpb-lawsuit-against-national-collegiate-student-loan-trusts.html>.

¹³ Office of U.S. Senator Elizabeth Warren, "Costly Consequences: How the Trump Administration Unleashed Private Student Loan Lenders," February 2026, https://www.warren.senate.gov/imo/media/doc/final_-_private_student_loan_report_on_plan_to_profit_from_big_beautiful_bill.pdf.

¹⁴ Legistorm, "Geof Gradler," https://www.legistorm.com/person/bio/54224/Geoffrey_C_Gradler.html.

founded a boutique lobbying firm¹⁵ whose top client every year through 2024 was the National Installment Lenders Association.¹⁶ In fact, prior to joining CFPB last August, you do not appear to have ever worked in a role where you were responsible for advancing the interests of consumers or combating predatory actors in financial markets.¹⁷ Given this background, we are concerned that you may be more inclined to protect the profits of private student loan lenders and loan servicers than fight on behalf of borrowers who are abused by these companies.

Finally, your role after the CFPB censored your predecessor's annual report is also cause for alarm. The Student Loan Ombudsman is statutorily required to publish an annual report describing their activities and evaluating the office's effectiveness to inform recommendations to policymakers.¹⁸ However, in October 2025, while you worked in CFPB leadership but before you were appointed Student Loan Ombudsman,¹⁹ CFPB leadership blocked the prior Ombudsman's annual report from being published.²⁰ After this egregious act of censorship, CFPB instead released a much shorter and far less informative annual report, crediting you as a co-author in a footnote.²¹ Your version of the report was fifteen pages shorter than the original version, which was later published by news outlets.²² Disturbingly, your version omitted an extensive analysis of the most common issue raised in private loan borrowers' complaints in 2025—lenders' failure to cancel the loans of borrowers defrauded by their schools (as often required under federal law)—and also left out the list of lenders and servicers that private loan borrowers most frequently submitted complaints about.²³ Your role in this disturbing episode of censorship suggests that you may be reluctant to fulfill your statutory duties when doing so would entail acknowledging private lender misconduct, raising concern about your ability to hold these companies accountable for anti-consumer behavior or even provide useful information to policymakers and advocates.

At a time when the Trump administration is already stripping borrowers, students, and families of their access to federal support and affordable repayment plans, rolling back consumer

¹⁵ Law360, "CFPB Hires Ex-Lobbyist For Top Policy Job Amid Rollbacks," Jon Hill, September 26, 2025, <https://www.law360.com/articles/2393020/cfpb-hires-ex-lobbyist-for-top-policy-job-amid-rollbacks>.

¹⁶ OpenSecrets, "Lobbying Firm Profile: AcumenDC LLC," <https://www.opensecrets.org/federal-lobbying/firms/summary?id=F317734>.

¹⁷ Legistorm, "Geof Gradler," https://www.legistorm.com/person/bio/54224/Geoffrey_C_Gradler.html; Law360, "CFPB Hires Ex-Lobbyist For Top Policy Job Amid Rollbacks," Jon Hill, September 26, 2025, <https://www.law360.com/articles/2393020/cfpb-hires-ex-lobbyist-for-top-policy-job-amid-rollbacks>.

¹⁸ 12 U.S.C. 5535.

¹⁹ *Id.*; Consumer Financial Protection Bureau, "Annual Report of the CFPB Private Education Student Loan Ombudsman," January 2026, p.2, https://files.consumerfinance.gov/f/documents/cfpb_pelo-annual-report_2026-01.pdf.

²⁰ The American Prospect, "The Student Loan Report the Trump Administration Didn't Want Published," Emma Janssen, January 16, 2026, <https://prospect.org/2026/01/16/student-loan-report-trump-administration-didnt-want-published/>.

²¹ Consumer Financial Protection Bureau, "Annual Report of the CFPB Private Education Student Loan Ombudsman," January 2026, https://files.consumerfinance.gov/f/documents/cfpb_pelo-annual-report_2026-01.pdf.

²² The American Prospect, "The Student Loan Report the Trump Administration Didn't Want Published," Emma Janssen, January 16, 2026, <https://prospect.org/2026/01/16/student-loan-report-trump-administration-didnt-want-published/>.

²³ *Id.*; Consumer Financial Protection Bureau, "Annual Report of the CFPB Student Loan Ombudsman," October 2025, p. 10, https://prospect.org/wp-content/uploads/2026/01/2025-SL-Ombudsmans-Report_Final.pdf; Consumer Financial Protection Bureau, "Annual Report of the CFPB Private Education Student Loan Ombudsman," January 2026, https://files.consumerfinance.gov/f/documents/cfpb_pelo-annual-report_2026-01.pdf.

protections, and decimating the Department of Education, student loan borrowers deserve a Student Loan Ombudsman who they can count on to protect them from bad actors. To address our concerns about your background and priorities as Student Loan Ombudsman, please answer the following questions by May 11, 2026:

- 1) One statutory responsibility of your role is to make policy recommendations to the CFPB Director, ED Secretary, Senate Banking Committee, and Senate HELP Committee, among others.²⁴ Will you commit to making these recommendations on at least an annual basis, and prioritizing the interests of borrowers, and not private student loan lenders, when making such recommendations?
- 2) Under the Federal Trade Commission (FTC) Holder Rule, private student loans are subject to the same claims and defenses that the borrower could assert against their school, meaning that borrowers who were defrauded by their schools may be eligible to have their loans cancelled.²⁵ The most common type of private loan complaint submitted to CFPB last year was about lenders refusing to evaluate such claims for debt relief, even when publicly claiming to offer such relief.²⁶
 - a) Do you support the application of the Holder Rule to private student loans? If not, why not?
 - b) As Student Loan Ombudsman, what steps will you take to support borrowers who are harmed by private lenders illegally ignoring the Holder Rule?
- 3) In June 2025, the most recent month covered by your predecessor's annual report, the most common type of private loan complaint was issues with credit reporting.²⁷ As Student Loan Ombudsman, what steps will you take to protect borrowers who are harmed by credit reporting errors?
- 4) Under your leadership, how many CFPB employees will be responsible for resolving private student loan borrowers' complaints? How many CFPB employees had been responsible for doing so under the Biden Administration?
- 5) Under what circumstances do you believe that borrowers should take out private student loans?

²⁴ 12 U.S.C. 5535.

²⁵ New America, "Guest Post: "Holding" Lenders Responsible for Ripped-Off Students," Deanne Loonin, February 16, 2009, <https://www.newamerica.org/insights/guest-post-holding-lenders-responsible-for-ripped-off-students/>; Letter from U.S. Senators Elizabeth Warren, Edward J. Markey, Jeffrey A. Merkley, et al. to Navient President and CEO David L. Yowan, April 17, 2024, <https://www.warren.senate.gov/imo/media/doc/2024.04.16%20Letter%20to%20Navient%20on%20Cancelling%20Predatory%20Private%20Student%20Loans.pdf>.

²⁶ Consumer Financial Protection Bureau, "Annual Report of the CFPB Student Loan Ombudsman," October 2025, p. 20, https://prospect.org/wp-content/uploads/2026/01/2025-SL-Ombudsmans-Report_Final.pdf.

²⁷ *Id.*

- 6) How do you think an expansion of the private student loan market would affect the financial well-being of borrowers? What implications would such an expansion have for your role as Student Loan Ombudsman?
- 7) Is CFPB still deprioritizing supervision and enforcement activities relating to student loans, as reported in an April 2025 internal memo?²⁸ If so, please explain what actions CFPB has taken to do so.
- 8) Have you ever lobbied on behalf of a company that has, at any time, offered private student loans?
 - a) If so, provide any and all company names and the range of years during which you lobbied on their behalf.
 - b) Will you recuse yourself from handling any allegations of misconduct involving a company you have represented as a lobbyist or a company whose parent company you have represented?
- 9) Please describe any role you played in the decision to censor former Student Loan Ombudsman Julia Barnard's 2025 annual report.
- 10) Why did your version of the 2025 annual report omit each of the following topics that were included in the uncensored report:²⁹
 - i) The most frequent companies mentioned in private student loan complaints?
 - ii) The most frequent specific problems reported in private student loan complaints?
 - iii) Discussion of private lenders illegally refusing to discharge loans under the Holder Rule or misleading borrowers about their rights under the Holder Rule?
 - iv) The shares of timely responses and average response times of specific companies receiving a large number of complaints from borrowers?
 - v) Data describing the extent to which CFPB's complaint mechanism successfully addressed borrowers' complaints?
- 11) In your 2025 annual report, you wrote that CFPB should favor a "systems approach" to resolving complaints and should only seek to directly resolve individual borrowers' complaints "in the rare cases where it is necessary to do so."³⁰ What criteria will you use to determine whether a borrower's complaint is one of those "rare cases," and approximately what percentage of complaints do you expect to address through a "systems approach"?

²⁸ Tweet by Brian Schwartz, April 16, 2025, <https://x.com/schwartzbWSJ/status/1912633869255188512>.

²⁹ Consumer Financial Protection Bureau, "Annual Report of the CFPB Student Loan Ombudsman," October 2025, p. 10, https://prospect.org/wp-content/uploads/2026/01/2025-SL-Ombudsmans-Report_Final.pdf; Consumer Financial Protection Bureau, "Annual Report of the CFPB Private Education Student Loan Ombudsman," January 2026, https://files.consumerfinance.gov/f/documents/cfpb_pelo-annual-report_2026-01.pdf.

³⁰ Consumer Financial Protection Bureau, "Annual Report of the CFPB Private Education Student Loan Ombudsman," January 2026, https://files.consumerfinance.gov/f/documents/cfpb_pelo-annual-report_2026-01.pdf.

12) Given the Trump administration's choice to rename your role as Private Education Loan Ombudsman, will your team only address private loan borrowers' complaints, or will it continue to address federal loan borrowers' complaints as well? Do you plan to compile data and produce policy recommendations regarding both private and federal loans?

Thank you for your attention to this important matter.

Sincerely,



Elizabeth Warren
Ranking Member
Committee on Banking,
Housing, and Urban Affairs



Bernard Sanders
United States Senator