

September 24, 2021

**Submitted via [www.regulations.gov](http://www.regulations.gov)**

Ms. Julie Marietta Morgan  
Office of the Under Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

**Re: Request for Information Regarding the Public Service Loan Forgiveness Program; [Docket ID ED—2021—OUS—0082]**

Dear Ms. Morgan:

Thank you for the opportunity to comment on the Department of Education's (ED) Request for Information (RFI) for Information Regarding the Public Service Loan Forgiveness Program; [Docket ID ED—2021—OUS—0082]. As an association whose members collectively employ thousands of non-profit and state government employees, we thank ED for soliciting comments to improve the Public Service Loan Forgiveness Program (PSLF).

The National Disability Rights Network (NDRN) is the non-profit membership association of Protection and Advocacy (P&A) and Client Assistance Program (CAP) agencies that are located in all 50 States, the District of Columbia, Puerto Rico, and the United States Territories. In addition, there is a P&A and CAP affiliated with the Native American Consortium, which includes the Hopi, Navajo and San Juan Southern Paiute Nations in the Four Corners region of the Southwest. P&A and CAP agencies are authorized under various federal statutes to provide legal representation and related advocacy services, and to investigate abuse and neglect of individuals with disabilities in a variety of settings. The P&A / CAP Network comprises the nation's largest provider of legally-based advocacy services for persons with disabilities.

As a not-for-profit organization representing other non-for-profits across the nation, NDRN has a vested interest in the administration of the PSLF program in order to attract and retain a diverse and educated workforce at NDRN and across our network. In order to provide timely and relevant feedback to the RFI, NDRN sent a voluntary survey to all P&As to solicit feedback on the questions posed in the RFI. The survey asked respondents to provide feedback to any of the 16 questions posed in the RFI.

## **Characteristics of Survey Respondents**

We received responses from individuals in the following states: Arizona, California, Delaware, Florida, Illinois, Iowa, Maine, Massachusetts, Michigan, Mississippi, New Mexico, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Texas, Tennessee, Vermont, Virginia, Washington, Washington D.C., West Virginia, and Wisconsin. The vast majority of survey respondents identified as holding a Juris Doctor (J.D.) degree. Several respondents identified as holding Masters Degrees or Associates degrees while one respondent identified as holding a Master of Business Administration. Below, we have included the most salient responses to the respective question in the RFI we are discussing in these comments. Not every response from the survey is included in these comments, as we wanted to ensure ED received the most relevant responses for each question.

## **Survey Responses**

In response to the first question in the RFI, “What are the direct and indirect effects of student debt on America’s public service workforce?” we received 53 responses. Below are the most salient responses from the survey:

**For me it is being age 57 and ready for retirement but wondering how I'm going to pay my \$400 monthly student loan obligation for the rest of my life as that is how long it will take me to pay it; actually, it will not be paid during my lifetime and I fear having to leave this debt behind and my resources (home, life insurance, etc.) that I have bequeathed to my children will need to be used to settle this debt. I have two adult children with disabilities and would love for them to have a safe place to stay upon my death, but I'm not sure about that with this \$180,000 student loan debt looming over my head. I really cannot afford to pay my student loan debt. I'm also raising a granddaughter and she's nearing graduation; not sure how I will pay for her college expenses because I definitely cannot take out another student loan for her. – M.A. degree holder, North Carolina**

**Significant portions (37%) of my income will go to student loans and 53% of the payments will be interest only. This inhibits or limits the ability to purchase homes, be able to have children, and provide healthcare (for myself and family), and limits my ability to save for the future. Despite the fact that I have worked hard many years for a degree and work a full time job. Despite the fact that if I did not utilize loans, it would have been impossible for me to even go to school and find a job that pays regularly and provides healthcare. – J.D. degree holder, Maine**

**The most significant effect is the shortage of people with significant student debt who are able and willing to provide public services at a significantly lower salary than their peers who go into the private sector. For example, a new attorney working in a large firm can easily expect to start their career earning \$100,000 per year; I will not see that level of compensation at all in my current position, where I have been for 14 years. The salary discrepancy allows privately employed individuals to pay off student loan debt much more quickly than those in the public sector. For some individuals (e.g. those who live alone, people of color,**

etc.), they cannot survive on the meager earnings that remain after paying their loans each month. Many look for roommates and/or work second jobs; some simply move out of public service work. The lack of individuals who can afford to work in public service impacts people who require, but cannot access or receive, those public services. Often these are people living in poverty and/or people of color, and/or other marginalized persons. For example, someone who does not have the means to hire a private attorney may seek services from a legal aid organization. But because of limited staffing, they may not be able to receive those services. And those of us who are working in the public sector are forced to work harder in order to fill in those gaps. – J.D. degree holder, North Carolina

Speaking for myself, I underestimated how long ten years is. I did not foresee the effects I am seeing now as person 7 years in. For example, my debt has limited my ability to take on new and higher paying jobs in the private sector. My wife and I also file our tax returns separately so we are not able to receive the benefits of filing as a married couple. – J.D. degree holder, California

Student debt and the high cost of higher education and graduate education limits available career options for people whose families of origin were not financially able to pay for college. This has a disproportionate impact on people from marginalized groups including of color, first generation immigrants, first generation college, etc. Students who graduate with a high student loan debt are forced to find employment with sufficient pay to cover monthly loan payments in addition to other household expenses. If people chose government or non-profit employment despite high student loan debt, they face other difficult choices such as inability/delay in purchasing a home, or living in substandard housing. This also limits the available employment pool for non-profit/government work. - J.D. degree holder, Wisconsin

Debt directly impacts budgeting and credit. When my husband and I tried to get a mortgage we were told we couldn't qualify because of debt to income ratio from my student loans. We were renting at 2,700 a month, a mortgage would have been less than rent but there was no way to qualify with the amount of debt I carry. Indirectly, the amount of debt for higher degrees like J.D.s might discourage people from becoming lawyers if they want to do public service work since the pay won't put a dent in the debt. – J.D. degree holder, Arizona

I can't afford to buy a home because of my increasing debt to income ratio. I can't afford to pay rent for an apartment to live independently (by myself) because of the monthly payments which can sometimes add up to a car payment- that's with the income based repayment plan. My debt balance is increased with outrageous interests, I've been paying my loans for over 10 years yet I owe more today than when I graduated. I struggle to further my education because I don't want to get into more student loan debt. – B.S. degree holder, California

I've gotten a later start on saving for retirement. I could not do as much career development in my twenties because I could not take further time out for education or internship opportunities because I needed to make enough to cover

**my loans. Despite a strong undergraduate academic career, I did not progress with further education because I did not feel financially stable enough to take on even more loans. I will likely never own a home. It's difficult to justify staying at a non-profit with a lower salary when I'm trying to plan for my future. – B.A. degree holder, Washington**

**As a third generation Filipina, student debt is the only obstacle for me in trying to achieve any generational economic sufficiency. Directly, monthly payments take a chunk out of my paycheck, especially if you live in a big city with limited housing options and high rent. Indirectly, monthly payments impact my ability to save money for a home, help my parents with their bills, and taking a vacation will always result in making a dent on my credit cards. As someone who's worked in public service, the pay is not high and the benefits come from helping the community. I just wished school loan payments were easier to discharge, to make helping the community not take such a toll on my paycheck with inevitably impacts a lot of my ability to survive. – M.L.S. degree holder, California**

**Personally, I have struggled to make ends meet with my salary and have been unable to meet the requirement of "Repay those loans under an income-driven repayment or standard repayment plan; and Make 120 qualifying payments". I have had several unexpected financial obligations over the years that forced me to defer or put my loans on hold. I do the work I do out of passion and love for serving my own Latinx and disability community. I have a mental health disability myself and have 3 children with disabilities. My husband is unable to work to help provide care for our children. This is a major hardship. – A.A. degree holder, California**

In response to the second question in the RFI, "What are the direct and indirect benefits of PSLF for America's public service workforce, including the effects of PSLF on individual borrowers, on the labor market, on communities, and on the populations served by public service workers?" we received 51 responses. Below are the most salient responses from the survey:

**PSLF is the only reason I went to law school at all. Without it, I would not have taken on the debt it required. (Over \$200k at this point, if you include interest). I always knew that I wanted to work in public interest and I had a strong desire to attend law school, but my financial situation was one where it would not have been an option without student loans and I simply don't know how I'd ever get out of debt if it weren't for PSLF. I can't imagine I am the only one in this position. PSLF helps encourage people like me to take on the risk of debt and allow us to provide services to the communities who need us. – J.D. degree holder, Iowa**

**PSLF encourages employment in public service and (eventually) frees public service workers of the financially restrictive student loan payments. Once public service workers are free of the burden of what are often highly restrictive student loans, they are able to do things like buy houses, support small businesses, and otherwise contribute to the support of lower-income workforce by spending money that they would otherwise be using to pay student loans. The populations**

**served by public service workers benefit from PSLF because the program encourages workers to engage in public service, thereby providing more much-needed support for low-income and marginalized groups of people. – J.D. degree holder, Illinois**

**Obviously the most direct effect is on the borrowers, who no longer have the burden of student debt looming over them. I completed my PSLF program and had more than \$66,000 in loans forgiven back in 2019. I cannot overstate how challenging it was to pay what essentially equaled a second mortgage each month in student loans, and what a weight was lifted when my PSLF came through. And I am one of the lucky ones, as I have a partner who makes a lot more than I do. Otherwise, I never could have afforded to buy a home until those loans were paid off. Now I can continue doing the work that I love without worrying about the financial burden of significant loan debt. There are many more benefits of PSLF – the ability to recruit and retain dedicated workers in the public service field; the ability of those workers to engage with the economy on a larger scale (e.g. purchasing real estate); and more opportunities for people to access the public services they need. – J.D. degree holder, North Carolina**

**I have stayed at my job in public service in large part to apply for the PSLF. I have been here for 5 years and have not sought out a higher paying job largely to qualify for the program. While my current position is ideal for me, I likely would have left by now for a higher paying job if not for PSLF. – J.D. degree holder, West Virginia**

**PSLF makes public service jobs more comparable to private sector with the value of loan forgiveness making up for lower salaries. It would seem that communities are better served when public service can attract highly educated professionals who plan to remain in the field for at least 10 years. – M.A. degree holder, Florida**

**PSLF allows people from diverse backgrounds and economic positions to apply for further education. My father didn't finish college and couldn't contribute to my graduate school education, but I was able to pursue my dream of public interest law and accept a public service job serving students with disabilities that started paying me only \$38,900 in my first year. I was only able to do this because I would have reduced student loan payments based on my income. –J.D. degree holder, Texas**

**The main benefit was I had no concern or fear taking an entry-level job as a public interest attorney. If I did not have PSLF as an option, I definitely would have sought out jobs in the private sector to pay off loans and then returned to the work I wanted to do and found most rewarding. I am just one person but on the aggregate I bet many attorneys feel the same way, and our public interest clients have benefitted. – J.D. degree holder, California**

**The benefit of PSLF is that more low-income and/or BIPOC people can afford to work in public service. As much of the client base is also low-income and/or**

**BIPOC, this creates a client relationship that may be more based on trust and understanding. – J.D. degree holder, Wisconsin**

**PSLF encourages people to enter the public service workforce which increases access to justice in underrepresented or underserved communities. Not everyone can afford a lawyer so being able to do the work and know that at some point my loans will be forgiven incentivizes the work. I personally made professional and personal life decisions based on the promise of PSLF and knowing that my crippling six figure student loan debt would be forgiven after 10 years. J.D. degree holder**

In response to the third question in the RFI, “Does PSLF provide a strong incentive for borrowers to engage in public service work? How are public service workers’ employment decisions affected by their debt and by PSLF?” we received 54 responses. Below are the most salient responses from the survey:

**PSLF could provide an incentive if administered appropriately. However, this program has been so poorly run that it undermines the incentive it intends to create. Often people leave public service for higher paying jobs despite and because of PSLF - it’s not worth the burden PSLF creates. – J.D. degree holder, Ohio**

**The program’s 10 year time line is very concerning. They should offer an annual incentive. For example, in year 2 they forgive 2% of your loans or \$10,000. Then in year three it’s \$20,000 and so on. Then any remaining amount after 10 years is forgiven. – J.D. degree holder, Illinois**

**PSLF provides a very strong incentive to engage in public service work, particularly if loan balances and accrued interest are extremely high. Shortening the time frame in which borrowers would qualify would strengthen the incentive further by making it more appealing to engage in public service work. – J.D. degree holder, Illinois**

**I tried applying for loan forgiveness when it was first announced and was told that the payments I had been making did not count because my loans were not in the "right" program, and that I would need to convert my loans, and then start the 120 payments all over again. There is no incentive, if this is what happens to folks when they apply for loan forgiveness. – B.A. degree holder, California**

**Not really, the salaries are often not high enough to justify the work if you aren’t already planning to be engaged in it. 10 years is a long commitment in the modern workforce. The program is difficult to understand and to confirm if you will fully benefit at the end of a decade. If you only have undergraduate loans you might end up paying the bulk back anyway in 10 years so it’s not worth the hassle. – B.A. degree holder, Washington**

In response to the fourth question in the RFI, "What borrower experiences should the Department and Congress consider when making improvements to PSLF?" we received 53 responses. Below are the most salient responses from the survey:

**The PSLF system is extremely complicated. It took 3 months after my first PSLF job to get the payments sorted out so they actually started applying to my 10 years. – J.D. degree holder, Iowa**

**I was working for 5 years when I first heard about this program. I called to enroll and was told for some reason that I didn't qualify and that I would have to refinance all of my loans first. It was a very confusing process and the loan officer explained that by the time I would have the loans forgiven, I would have already paid them off by myself. Now, I am going on my 11th year of public service, and yet, I am still paying down my loans. The end is in sight, but I have paid back more than I should have- and that is with paying them down more aggressively than I needed to. – B.S. degree holder, North Carolina**

**There is so much misinformation and lack of education about PSLF's requirements and the government has done nothing to address it. People do not know what constitutes a qualifying employer or repayment plan or loan. People receive incorrect information from their loan servicers and when this is discovered, no steps are taken to correct the issue - the borrower is just out of luck. Often people have made the necessary number of payments but are still denied forgiveness for inexplicable reasons. People continue to make payments in a program far past the time they should. People take jobs in reliance of PSLF and it is to their detriment. – J.D. degree holder, Ohio**

**The loan servicers are not great, it also seems unnecessary to renew the income based application every year if your income does not change by more than X percent. Every year I fill out a new application, and it seems like every year they send back my payment amount higher than it's ever been with no change in income, so then they put my loan into deferment for a month and I have to resubmit the application and miraculously it comes back with a payment amount like before. These unnecessary steps and subsequent deferments have extended my chance to have my loans forgiven by at least 6 months. – J.D. degree holder, Vermont**

**The Department and Congress need to adequately fund loan servicers so that they are able to provide assistance during the annual re-application and through the PSLF process. These are extremely complicated processes for the average borrower and require assistance from adequately resourced servicers. In addition, since graduating law school I have had to deal with multiple errors in my accounts by my servicer, which if uncorrected would have cost me years of PSLF credit. For this program to be effective Congress needs to simplify PSLF dramatically or adequately fund the servicers. – J.D. degree holder, Washington**

In response to the fifth question in the RFI, “What features of PSLF are most difficult for borrowers to navigate?” we received 55 responses. Below are the most salient responses from the survey:

**There is a significant problem with loan servicers. I believe I am currently with my third loan servicer. At some point after 2007, a decision was made that only payments made with a certain loan servicer would "count" toward the 120 qualifying payments. This was not clearly communicated. I have been paying my federal loan since 2010. I did not switch to the appropriate loan servicer until 2015. Right now, I have 100 qualifying payments, but I have made many additional payments that are not counted as qualifying. Some are "pending manual review" whatever that means. And I just received notice that my current loan servicer will no longer service loans in 2022. – J.D. degree holder, Wisconsin**

**The feature of PSLF that is most difficult to navigate are the various components of ensuring qualifying payments. This includes not only ensuring that loans are rolled over into the appropriate type, but that loans have not been mistakenly put into pay-ahead or other types of status that do not count as qualifying payments. – J.D. degree holder, Washington**

**Lack of trust in the system because there have been accounts of people not having their loans forgiven because they did not save all of the documentation of payments made. One has to be very meticulous in saving all documentation, especially if loan service providers change, as is the case for many right now. Also, I know of law graduates who didn't want to go into the PSLF program because they feared that Congress could revoke it any time and leave them with more debt than when they graduated. – J.D. degree holder, Washington**

In response to the sixth question in the RFI, “What role do loan servicers play in making it easier or harder for borrowers to access PSLF?” we received 50 responses. Below are the most salient responses from the survey:

**Loan servicers need to provide accurate, consistent information. I've spoken to 50 over the course of the years and each time I call, I get different conflicting information concerning how many years I've actually paid towards forgiveness. – M.A. degree holder, North Carolina**

**The knowledge of their employees and the accuracy of the information they provide to borrowers is everything. For example--forgiveness dates are not currently accurate because of the pause on student loan payments. Even though we're told that all of these months will count towards forgiveness, the paperwork we're getting has pushed out the date. If you call, you're told that it's just an error from the current COVID freeze, but it's still hard to trust. – J.D. degree holder, Iowa**

**Some loan servicers give inaccurate information to borrowers, ultimately resulting in a borrower making payments that do not count towards PSLF. Many borrowers do not submit annual employment certification and, while that is on**



**the borrowers and not the servicers, these borrowers do not know that their payments have not counted towards PSLF until many years down the road. – J.D. degree holder, North Carolina**

In response to the seventh question in the RFI, “What barriers prevent public service workers with student debt from pursuing PSLF or receiving loan forgiveness under PSLF?” we received 50 responses. Below are the most salient responses from the survey:

**I think the biggest barrier is that even if one selects an income-based repayment plan under the PSLF program, the monthly payments can still be significant. Knowing that debt will be forgiven at the end of that 10 year period (120 payments) is a shining light at the end of the tunnel, but climbing through that tunnel can be cost-prohibitive in itself. – J.D. degree holder, North Carolina**

**Lack of information upon graduation. Complex rules pertaining to income repayment and taxes for married individuals. – J.D. degree holder, West Virginia**

**The fact that 10 years is a long time and any number of life challenges could affect your ability to make 120 consecutive payments. In my situation, I went through a divorce, some medical problems, and job loss, which meant that I had to go into deferment or forbearance multiple times and therefore it will take a very long time before loan forgiveness is even an option for me. – J.D. degree holder, Maine**

In response to the eighth question in the RFI, “For borrowers who have or had loans other than from the Direct Loan program, what have your experiences been when trying to access or participate in PSLF?” we received 39 responses. Below are the most salient responses from the survey:

**I received a lot of misinformation from a loan servicer that impacted the timeline under which I made payments. Though the errors were well known, nothing was done and I have made years of extra payments. – J.D. degree holder, Ohio**

**I had former loan servicer tell me that consolidation would not affect PSLF, and in fact it restarted the clock on the 120 payments. I considered leaving public service over this experience, but have so much time invested. I’m currently trying to deal with it through customer service, but with customer service ignoring my appeal and servicers changing again it seems hopeless. – M.A. degree holder, Florida**

**My experience was that the paperwork was laborious and there was no response to my application. The response was then delayed. There was no efficient online way to apply and no follow-up. – B.A. degree holder, Washington**

**I am able to participate, but the level of administrative burden (wrangling employer signatures via fax or email) on me as a borrower is enormous. I work in an office, so I am able to be organized enough, but this may be an issue for other borrowers. – M.P.H. degree holder, Oregon**

In response to the ninth question in the RFI, “How can communications about PSLF requirements be improved?” we received 41 responses. Below are the most salient responses from the survey:

**More clear explanations and technical assistance. Periodic updates regarding borrowers status in program. – M.A. degree holder, Massachusetts**

**This should be communicated to students who are in college programs with majors/minors in non-profit work, and other qualifying fields. HR offices should also give this information to people right away. – B.S. degree holder, North Carolina**

**I think regular reiteration of the program requirements and our progress towards forgiveness would help. For example, our number of qualifying payments is only adjusted after we file the paperwork every year, versus with every payment. – J.D. degree holder, Iowa**

**Emails from the Department of Education explaining how exactly to apply and the status of PSLF payments would be helpful. – J.D. degree holder, Illinois**

**Ensure staff are knowledgeable and able to provide guidance about a borrower's unique circumstances, or can pass the borrower to someone with those skills. Develop plain-language checklists to help borrowers select a repayment plan and monitor their progress annually. – J.D. degree holder, North Carolina**

**HR at public service agencies should actively promote PSLF and facilitate completion and submission of paperwork for borrowers. Recertification should happen automatically as long as employment continues. – M.A. degree holder, Florida**

**Use plain language in the instructions and make the information readily available to all. – B.A. degree holder, California**

**Put more money into outreach for public sector employers so we can promote it as a benefit to work in the public sector. – J.D. degree holder, Pennsylvania**

In response to the tenth question in the RFI, “What are the common questions that borrowers have about PSLF?” we received 40 responses. Below are the most salient responses from the survey:

**Will this debt actually be forgiven or am I going to end up with a larger debt balance after 10 years of repayment due to some technicality. – J.D. degree holder, West Virginia**

**How much do I have to pay each month? What kind of employer do I need to have? Will I be taxed on my forgiven debt? (That's a very frequent question.) – J.D. degree holder, North Carolina**

**Is it actually going to happen? If something changes and it is no longer an option, will people who have been relying on that opportunity be grandfathered in and still be eligible to have their loans forgiven. - J.D. degree holder, Vermont**

**Can you work in public service, work at a non-qualifying employer, and then go back to working at PSLF without penalty? If you are unemployed (or on extended, family, and/or medical leave) for a period of time how does that affect PSLF? – J.D. degree holder, Virginia**

**What is a qualifying employer? What loans qualify? If I have loans that don't qualify, what can I do to change that? – J.D. degree holder, Maine**

In response to the eleventh question in the RFI, “What operational steps can the Department take to strengthen PSLF and better serve public service workers who currently owe student debt, including borrowers who have already applied for and been denied PSLF?” we received 44 responses. Below are the most salient responses from the survey:

**Communicate clearly all standards and changes. Expand and create more forgiveness for "continuous qualifying payments." Make any forgiveness tax exempt. All payments made that were interest only or more needs to be retroactively applied to the 120 consecutive payments once enrolled. - J.D. degree holder, Maine**

**Create an online portal where you can apply for PSLF and your payment certification can be submitted and tracked. – J.D. degree holder, Illinois**

**More information and monitoring throughout the PSLF period, to ensure borrowers are actively engaged and progressing through their repayment period. Adopt a formal appeal process to address both monthly payments that are deemed insufficient, and denial of PSLF. Consider restructuring income-based repayment to ensure the amount of a borrower's monthly payment does not negate the utility of the PSLF program and thus preclude the borrower's participation. – J.D. degree holder, North Carolina**

**Have the borrowers' employment status and employers' name directly tied to their student loans. – M.S. degree holder, West Virginia**

**Make the qualifying number of payments the standard without regard to consolidation. Allow those who have been denied the right to appeal or reapply the ability to appeal or reapply. – M.A. degree holder, Florida**

**When denied, it would be helpful to get a reason for denial so we can understand what we need to do. Also, the application process is very confusing. I recommend creating a website where employers can log on and verify employment for the public service worker. – B.S. degree holder, California**

**Reduce the timeframe and number of consecutive payments required to get loan forgiveness. Or do a tiered system where you can have 20% forgiven after two**

**years and then 40% after four years and so on so that borrowers can have that progress before 10 years' worth of payments are made. That way they still have to stay in public service for 10 years before it is totally repaid, but they will start to see the load lightened much earlier than that. – J.D. degree holder, Maine**

In response to the twelfth question in the RFI, "What steps can the Department take to improve borrowers' experiences in applying for PSLF?" we received 40 responses. Below are the most salient responses from the survey:

**Guarantee that loan servicers have trained, educated employees who can answer questions. It's terrifying knowing you have to trust someone in a call center on certain aspects and not knowing if their answers are completely accurate. Additionally, they could force the servicers to complete the forgiveness process in an efficient manner. While I'm still several years away from forgiveness, I worry about stories I hear from people who had to continue to make payments for an additional year when the application was pending. – J.D. degree holder, Iowa**

**Faster response to application and certification requests. – J.D. degree holder, Illinois**

**Allow for application into the program at the beginning of repayment and provide support for borrowers' throughout repayment. That support needs to be effective. Every call, email or letter I have ever sent to the servicer has been futile. Usually because the person I am speaking with knows so little about the program they don't even understand my question and have no way to resolve issues. – J.D. degree holder, West Virginia**

**The application process is very confusing. I recommend creating a website where employers can log on and verify employment for the public service worker. Then creating a checklist for what steps we are missing to better understand what we're lacking. Also, make it more clear from the moment students are taking out student loans on the process of how they will need to qualify and apply for PSLF later. – B.S. degree holder, California**

**Please create individual accounts, bi-monthly confirmations, and a phone application so it will help people with low financial literacy have the ability to access with ease. – M.L.S. degree holder, California**

In response to the fourteenth question in the RFI, "What can the Department do to better partner with employers to ensure that all borrowers know about the benefits of PSLF?" we received 21 responses. Below are the most salient responses from the survey:

**Employers should let employees know about the PSLF at initial orientation and annually. Send out email blasts, etc. The Department can also do a better job at advertising it via social media platforms, TV, emails, etc. – M.A. degree holder, North Carolina**

**Employers should be aware of the program and provide this information directly to staff. Brochures/flyers in breakrooms or other common spaces. Regular training for HR professionals so they can also explain to new hires. – B.S. degree holder, North Carolina**

**Offer outreach and technical assistance to employers whose employees are eligible for PSLF, to both ensure employers and borrowers know about the program, and to assist them in applying. We had an HR representative who was significantly misinformed about the PSLF program and gave a colleague advice that would have jeopardized her successful participation in the program. Had I not recently completed the program and been able to remedy the poor advice, that borrower would have lost out on months of repayments that could have counted toward forgiveness. Ensuring HR has the necessary information and knowledge, and filling that gap for companies that do not have HR programs, is crucial. – J.D. degree holder, North Carolina**

**Include the benefit in job postings. Increase the participation of employers in helping with application and recertification. – M.A. degree holder, Florida**

**Make sure employers know to regularly advise employees of the program, encourage people to participate, and provide resources or tech support to people as needed. – J.D. degree holder, Maine**

**Educate employers about the program and making sure they let people know from the moment they are hired that this is a possibility for them. – J.D. degree holder, Maine**

In response to the sixteenth question in the RFI, “Are there any considerations about PSLF that the Department should bear in mind as it prepares for the end of the COVID–19 administrative forbearance on Direct Loans?” we received 40 responses. Below are the most salient responses from the survey:

**Include the forbearance period in the required time frame for borrows that were unable to make the minimum required payments. – M.A. degree holder, Massachusetts**

**Many people have been struggling financially - even if they retained their PSLF job- because of the increasing costs of housing, basic necessities and job losses of partners. The Department should be prepared that PSLF participants may not be on financially stable footing even if they kept their employment due to inflation of living costs & other economic burdens from COVID. – J.D. degree holder, Iowa**

**Yes, the Department should begin contacting people to let them know exactly when they will have to begin paying their student loans and the amount they need to pay. The department should streamline the process by having only one or two repayment options but those options should be manageable for everyone, all income types. - M.A. degree holder, North Carolina**

**The department needs to retroactively consider payments made during the administrative forbearance towards the 120 payments. And they need to consider any amount paid (continuous or under) towards the 120 total payments. - J.D. degree holder, Maine**

**Make sure communication is frequent, clear and provided through more than one way to ensure borrowers understand repayment start dates and requirements for renewing repayment plans and employment certification. – J.D. degree holder, West Virginia**

Again, we appreciate ED's interest in improving access to PSLF. We urge ED to take these comments into consideration when determining actions it can take to ensure relief is provided to individuals who choose to serve our nation through a career in public service. Please contact Cyrus Huncharek, Senior Public Policy Analyst, at [cyrus.huncharek@ndrn.org](mailto:cyrus.huncharek@ndrn.org) should you have any questions or concerns with these comments.

Sincerely,



Curtis L. Decker  
Executive Director