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## Comment

The form this comment relates to is the existing employment certification form we have to submit annually. I've had an issue with inputting my employer's Federal Employer ID number in the appropriate box. The problem is that the PDF file automatically enters a comma "," in the numbers we input. However, employer IDs don't have commas in them and instead have dashes "-" in them. This makes it very awkward to input employer ID numbers.

Also, the the employer certification area, the PDF does not provide enough space to input the certifying official's email address. Perhaps make that box bigger to allow for longer emails to be input. Thank you

Comment Period  
Closed

Feb 13 2017, at 11:59  
PM ET

**ID:** ED-2016-ICCD-  
0144-0005

**Tracking  
Number:** 1k1-8uem-  
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## Document Information

**Date Posted:** Jan 30,  
2017  
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## Submitter Information

**Submitter  
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**Category:** Individual

[FSA Reply - In response to the comment above, we have corrected the manner in which the Federal Employer ID number is formatted and expanded the fields that the authorized official must complete.](#)

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## Comment

Thank you for allowing public comment on the PSLF Draft Application. Regarding points 3 and 6 in the "I understand that..." Section 2 of the Application for Forgiveness:

"3. If I submit Employment Certifications covering 10 years of qualifying employment that occurred after October 1, 2007, I will be granted a forbearance on my Direct Loans while the Department determines my eligibility for forgiveness."

"6. If the Department determines that I am not eligible for forgiveness, I will be notified of this determination and why the determination was made. The forbearance was granted on my Direct Loans will end and the Department may capitalize (add to my loan's principal balance) unpaid interest that accrued during the forbearance period."

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## Submitter

Please do not force forbearance on folks applying for PSLF. If for some reason they do not qualify after applying for forgiveness, having their unpaid interest capitalized could be devastating. Working towards PSLF for 10 years and making payments under income-driven repayment plans can result in tens of thousands of dollars of unpaid interest. There is no reason to impose what amounts to a financial penalty to folks who apply for PSLF and do not have it granted for whatever reason. Capitalizing that interest as a result of the forced forbearance period may add thousands of dollars to their repayment just for submitting the PSLF application.

At a minimum, please consider allowing the borrower an option to have their loans continue in the current repayment plan while the PSLF determination is made. If for any reason PSLF is not granted, the borrower can continue in income-driven repayment without the unpaid interest being capitalized. Please do not financially penalize folks who think they qualify for PSLF and may not simply for submitting the application for forgiveness.

Thank you for your consideration,

Tony Bartels, DVM, MBA

[FSA Reply - Borrowers always have the option to decline a forbearance and continue making payments on their loans. However to make it easy for borrowers to do so, we have modified the form to make the forbearance a specific request of the borrower that he or she may opt out of by checking a box on the form.](#)

## Information

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