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Organization: National Council of Higher Education Resources (NCHER)

General Comment

On behalf of the National Council of Higher Education Resources (NCHER) thank you for the opportunity to provide the following comment.

Section 7: Instructions for Completing the Application. In the instructions it allows the applicant to have one CAO certify the information under section 5 for qualifying service for multiple schools within the same academic year:

If you taught at more than one school or for more than one educational service agency during the same academic year, the CAO from one of the schools or educational service agencies may complete Section 5. However, all of the schools and/or educational service agencies must be listed. If you taught at different schools or for different educational service agencies during different academic years, the CAOs from all of the schools or educational service agencies must certify your eligibility. If you need more than one CAO's certification, the additional certifications, containing the information in Section 5, may be provided on a separate piece of paper and submitted with your completed form.

This follows the regulations in [34 CFR 682.216(c)(10)]; however, not all guarantors will accept multiple schools listed on the same application for qualifying service performed in the same academic year. We recommend the following borrower friendly edit be made for clarity - add in the same district to prevent confusion to the applicant and not have conflicting information for applicants.

If you taught at more than one school or for more than one educational service agency during the same academic year in the same district, the CAO from one of the schools or educational service agencies may complete Section 5.

Thank you for consideration of this clarification.

NCHER

FSA Responds:

Thank you for your comments. We presume that the rest of the paragraph to which the proposed change noted above would stay the same. Given that presumption, we agree that a change can be made to allow one CAO to certify teaching at more than one school or ESA but only if the schools and ESAs are part of the same larger organization which may or may not be a "district". Therefore, we have made the following change to the instruction language in Section 7:

If you taught at more than one school or for more than one educational service agency (ESA) during the same academic year or during different academic years, a single CAO who has access to employment records that establish your eligibility for loan forgiveness and is authorized to verify your qualifying employment at each school/ESA may complete Section 5. However, all of the schools/ESAs must be listed. Otherwise, the CAOs from each school/ESA must certify your eligibility. If you need to list multiple schools/ESAs or need more than one CAO's certification, the information required in Section 5 may be provided on a separate piece of paper and submitted with your completed form.

Name: Kermit Kubitz

General Comment

Loan forgiveness for people who undertake teaching careers is a vital and highly important way to contribute to quality educational services and provide incentives for college students who must use loans to undertake public service via teaching. The forms and requirements for loan forgiveness should be simplified to the maximum extent possible. There should not be a requirement for five consecutive years of teaching given the Covid19 disruption to the educational process. In addition, because the school year is normally about nine months, 45 months of teaching in any 7 year period should be enough to make a teacher eligible for maximum loan forgiveness. This could comprise 3 years of 12 months teaching or 36 months, and one school year of 9 months, for a total of 45 months. People who teach during summers and continuously should be able to take advantage of rapid loan forgiveness. This is an important program and any balancing of issues regarding loan forgiveness should be in favor of teachers.

FSA responds:

Thank you for your comments. Although your comments do not pertain the language on the forms or the burden associated with the forms, but instead appear to be recommendations for changes to the terms and conditions of the Teacher Loan Forgiveness Program, we provide the following response:

With regard to the first comment, the U.S. Department of Education (the Department) expects to issue guidance in the near future on relief to borrowers seeking Teacher Loan Forgiveness whose teaching service was interrupted due to COVID-19. With regard to the second comment, the Department can't do what the commenter recommended because there is a statutory requirement for 5 consecutive academic years of teaching and also points out that the definition of "academic year" (which is included on the form) addresses year-round instruction.